

# CALDERDALE LOCAL PLAN

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

Version 2

Document - Part 4

Calderdale Metropolitan Borough Council

June 2020





provision alongside the proposed development, it is narrow and in poor condition further along its length and the roads that link to Upper Lane are also narrow, twisty and sometimes in poor condition. It is not good enough to consider only the immediate area of the development but the village as a whole: the area alongside Hall Lane, has already been stretched to accommodate a huge amount of extra housing in relatively recent years. To further add to this imposition is mere greed and shows a lack of imagination and consideration on the part of Calderdale Council. Instead of taking the easy, lazy option of granting permission to large-scale developers extending into greenbelt areas which destroy agricultural and aesthetically attractive areas, on which private individuals are frequently refused permission to build even a single dwelling, it should consider redevelopment of brownbelt areas that would improve existing blights on Calderdale's landscape and which are often closer to transport links. It is not only the road system of this part of Northowram that is inadequate for further traffic but the GP practice and local primary schools are already stretched to capacity. If Calderdale continues with this plan it should be prepared to put some of the profit from the sale of land and resultant council tax revenue into the development of Northowram's infrastructure as mitigation.

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 **HRU675**

Site ref (if applicable): **766**

Person ID: **1122554**

Name: **Mr Hadi Moussavi**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

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 **HRU682**

Site ref (if applicable): **LP0766**

Person ID: **1105968** Name: **Mrs Catherine Booth** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Regarding the planning application named above I would like to object to the building on green belt in the area between Upper Lane and Hall Lane in Northowram. This piece of land is one of the remaining areas of beauty left in the village and is home to a host of wild animals. Deer are regularly seen, and there are woodpeckers nesting in the trees along with bats and many other species. this is the lungs of the very busy village and a regular walking spot for locals getting their exercise and topping up their well-being with an hour in nature. The village as a whole has seen an enormous amount of houses built without any thought to the ensuing disruption to the flow of the village. The traffic is at the point of saturation and even though 20 mph limits are imposed there is no policing of this and cars continually speed through at twice this speed and more - risking the lives of the many children attending the local primary school, which is already much enlarged from its original numbers when built. The latest construction at the Yew tree site allows for several more homes with no parking facility yet this is right on the roundabout. People are already parking right up to the edges of the road into the Arboretum due to growing numbers of patients at the local surgery, and right up to the edge of the mini roundabout, creating problems with visibility and the ability for buses to turn safely on to Northowram Green. Newlands Road is now almost a single track down the middle as residents quite rightly park outside their own homes but this prevents the bus getting through. Even with some residents parking half on the road and half on the pavement, there is not always room for the bus to get through. Parking on the pavements also presents danger for mothers with prams and for mobility scooters as it forces them into the road. There would be no guaranteed way through for the emergency services should the need arise, with the resulting danger that would bring. Also, the other entrance to the village is single lane passing by the t-junction on Lydgate Traffic at peak times is absolutely dreadful already and adding a significant number of houses will only exacerbate this problem with all the extra vehicles. The number of people on foot in the village is also impacted with the speed of some cars speeding through and the number of children and elderly residents affected. I urge you to reconsider changing the green belt status of this beautiful area and call a halt to the constant building and pollution of the village.

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 **HRU685**

Site ref (if applicable):

Person ID: **1131906**

Name: **Mr Matthew Ambler**

Organisation:

Agent ID:

Name:

Organisation:

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 fulfill 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 fulfill 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 **HRU690**

Site ref (if applicable): **LP0766**

Person ID: **1243126**

Name: **Ms N P**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Northowram cannot take a development of this size without significant investment in the surrounding transport network. The village and surrounding areas are already under great strain without any new housing. The severe flooding in this area twice in the last week is just another example of this. New housing should be better planned so that it is built where there is provision to/planned investment in infrastructure, particularly near to transport hubs. This development will totally change the feel of a village that makes this a nice place to live. Building here will remove a large part of the accessible countryside in the village and make it feel like one huge housing area. As such I object to this sites inclusion in the Local Plan.

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

Duty to Co-operate Reason:

### Suggested Modifications:

Remove this site as Northowram already has more housing proposed in the Local Plan than it can accommodate and areas with superior infrastructure and further investment to come have a fraction of the proposed housing allocations. This is for no other reason than so the Council can claim more Council tax from new residents due to higher house prices. These are not acceptable planning policies!

Comments:

Additional Evidence Link:

Comment ID **HRU693**

Site ref (if applicable): **LP0766**

Person ID: **1243135**

Name: **Miss Katie Simmons**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Greenbelt: As a mother of a young child I have spent much of my maternity walking around this area, it is a place of escape and much needed greenery> I have often thought when walking that the area is slowly getting spoilt and there are already far too many new build houses in this area. Green belt is needed for wellbeing and needs to be preserved for future generation. 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 walls and snicket to the side of the field has the upright stone wall one of the only surviving in the area and of historical value in its current setting. 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 happened only last week both to the north and south of the planned 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. 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

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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:

Comments:

Additional Evidence Link:

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Comment ID **HRU694**

Site ref (if applicable):

Person ID: **1182105** Name: **Mr Kern Chappell** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

The areas infrastructure is already operating at a maximum. over subscribed school, traffic issues, impossible to get a doctors appointment. houses have to be built granted but the infrastructure is never added to. Its greenbelt there is brown all over, use that!!! Keep halifax green.

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 **HRU699**

Site ref (if applicable): **LP0766**

Person ID: **1243141** Name: **Mr Samuel Fraser** Organisation:

Agent ID: Name: Organisation:

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.

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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 **HRU701**

Site ref (if applicable): **LP0766**

Person ID: **1243151** Name: **Mrs Sharon Pearson** Organisation:

Agent ID: Name: Organisation:

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

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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 **HRU730**

Site ref (if applicable): **LP0766**

Person ID: **1243129**

Name: **Ms Chris Hoesli**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

This will cause a worsening in air quality and have a significant environmental impact. I think it is unacceptable to lose this amount of Green Belt land within an area, of the Council's own classification of 'semi-rural'. The reason we live in Northowram is its local countryside setting and development of this site is stealing this from residents who have spent a lot of money to live in this area will now also see the value of their properties decrease! The resulting increase in traffic will be dangerous, particularly given the proximity to schools and children's play area. I completely object to this site's inclusion within the Local Plan.

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 Plan and retain as green belt land - as it should be!

Comments:

Additional Evidence Link:

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Comment ID **HRU736**

Site ref (if applicable):

Person ID: **1242127**

Name: **Mrs Bronwyn Catlow**

Organisation:

Agent ID:

Name:

Organisation:

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

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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 **HRU744**

Site ref (if applicable): **LP0766**

Person ID: **514242**

Name: **Mrs Barbara Tempest**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

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

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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 **HRU747**

Site ref (if applicable): **LP0766**

Person ID: **1243245**

Name: **Miss Roxanne Armitage**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

It's on a green belt The highway can't handle the traffic The drainage/sewer isn't sufficient

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

Sound Reason:

How can it be justified building on the green belt when there's other open spaces available. The land is already prone to flooding, taking the natural drainage away by building on this land will make this situation worse. All the roads leading to this area are single track roads and not capable or suitable at carrying the extra traffic that will be generated

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

Duty to Co-operate Reason:

Suggested Modifications:

Build on other open spaces and not the green belt

Comments:

Additional Evidence Link:

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Comment ID **HRU748**

Site ref (if applicable): **766**

Person ID: **1243252**

Name: **Mr John Langley**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Calderdale Council - Who Said What? calderdale-consult.objective.co.uk 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. 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I've lived on Upper Hall View for 15 years and grew up in the village and Hall Lane frequently floods near to the Green and the traffic is frankly appalling around Northowram, Shelf, Hipperholme, Queensbury, Buttershaw. We can't cope with greater numbers!! 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:

Calderdale Council - Who Said What? calderdale-consult.objective.co.uk 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. Last week Hall Lane flooded as did cottages at Bunney Green. Where on earth would rain drain away if we had loads more concrete where there are now fields? I've lived on Upper

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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:

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Comment ID **HRU77**

Site ref (if applicable): **LP0766**

Person ID: **1094032**

Name: **Mrs Sue Chadwick**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

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

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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 **HRU775**

Site ref (if applicable): **LP0766**

Person ID: **1242905**

Name: **Mrs Elaine Colton**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

The proposed site is Greenbelt and overlooks Marsh Hall - a listed building dating from 1626 of architectural and historic significance. The setting and significance of Marsh Hall would be significantly and detrimentally altered by this plan. The existing traffic flow in this area is already very congested and the building of 120 extra houses - possibly an extra 200 or more cars, would create a severe problem. The loss of the Green Belt site would be a huge loss to the local community. The area is used for horse riding activities and also widely enjoyed by walkers. These activities would become dangerous and unpleasant due to all the extra traffic. One of the purposes of Green Belt is to enable separate communities to retain their individual identities by preventing an urban sprawl. The extra 959 houses proposed in the areas of Northwram and Shelf would destroy this.

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

Duty to Co-operate Reason:

This site should be removed from the local plan.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU78**

Site ref (if applicable): **LP0766**

Person ID: **1177730**

Name: **Mr Eric Andrew Whitehead**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

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:

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Comment ID **HRU792**

Site ref (if applicable): **LP0766**

Person ID: **1128086**

Name: **Mrs Leanne Holdsworth**

Organisation:

Agent ID:

Name:

Organisation:

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, as highlighted during the two storms in February 2020 when the area was subjected to flooding. 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. 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

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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 **HRU794**

Site ref (if applicable):

Person ID: **1243357**

Name: **Moore**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

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 disagree with the Council's assessment that there would be - "No impact on ANY heritage asset" 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:

This site should be removed from the local plan

Comments:

Additional Evidence Link:

Comment ID **HRU813**

Site ref (if applicable):

Person ID: **1182183**

Name: **Mr Martin Roberts**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

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 **HRU814**

Site ref (if applicable):

Person ID: **1182184**

Name: **Mrs Kimberley Roberts**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

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 **HRU819**

Site ref (if applicable): **LP0766**

Person ID: **1243411**

Name: **Mrs Joanne Marshall**

Organisation:

Agent ID:

Name:

Organisation:

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

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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 **HRU850**

Site ref (if applicable): **LP0766**

Person ID: **1243149**

Name: **Mrs Maureen Grant**

Organisation:

Agent ID:

Name:

Organisation:

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

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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 **HRU851**

Site ref (if applicable): **LP0766**

Person ID: **1243533** Name: **ms Lynn Greenwood** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

I feel Northowram should be kept as a village as building the amount of houses proposed will make it too big and change the village beyond recognition. It will cause major difficulties for highways with many narrow roads which are already very busy with limited passing places. I live on Howes Lane which will be used as a greater rat run for traffic going from Northowram into Halifax via Shibden. This road cannot support further traffic and it is difficult enough getting to and from home now. Also the main A58 and main road through Northowram are always busy and this development would create a further increase in traffic and pollution. The area proposed is greenbelt currently and separates the village from neighboring villages which will be at the threat of merging. March Hall a grade listed building should remain in an open setting and by building the proposed development the setting of the area would be greatly altered. The country lanes are also used by many walkers and hose riders in the valley

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

Duty to Co-operate Reason:

Suggested Modifications:

For the site to be removed from the local plan and brown rather than green sites looked at for housing developments

Comments:

Additional Evidence Link:

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Comment ID **HRU852**

Site ref (if applicable):

Person ID: **1241010** Name: **Mr Carl Pope** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

## Sound Reason:

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 fully 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 **HRU873**

Site ref (if applicable):

Person ID: **1243525**

Name: **Mr Andrew Callaway**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Infrastructure in Northowram is already fully stretched : congested roads and dangerous junctions are a hazard for both motorists and pedestrians. Building on this site would probably see another 200+ vehicles brought on to the village roads and lanes. Upper Lane is virtually single-track (even the planners say it is unsuitable for residential traffic), and Hall Lane is also narrow. In addition, all access/exit routes from this site lead to a limited number of already over-used bottlenecks. In short, Northowram is "full", having been overdeveloped in recent years without the provision of additional infrastructure. The suggested commuting times from Northowram to Halifax are simply not accurate as at peak times it can take 30+ minutes to get in to town. The extra traffic generated by this proposed development would make this worse - and the buses would, of course, also be further delayed. The Stump Cross junction would become even more of a traffic jam than it is now. The Hall Lane site is also valuable from an ecological and historical perspective (wild life habitat, footpaths, listed buildings etc), and is one of very few open spaces left within the village boundaries. It should be preserved and left untouched.

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 **HRU883**

Site ref (if applicable): **LP0766**

Person ID: **1130397**

Name: **Mr Andrew Howarth**

Organisation:

Agent ID:

Name:

Organisation:

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: Hall Lane, and the proposed site was recently under water following Storm Ciara. Flood risk will increase with more housing. 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, as above, 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 was in evidence recently following Storm Ciara, when the field itself was also under water. 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. Bats are also known to be in the area. 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 is enjoyed by walkers and horse riders for the very fact that it is an 'open space' and one of the few small areas uncluttered by new housing. 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 **HRU884**

Site ref (if applicable):

Person ID: **1122593**

Name: **Ms Janet Griffiths**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

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 definitely remains 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 **HRU89**

Site ref (if applicable): **LP0766**

Person ID: **1092924**

Name: **Mrs Lisa 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:

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Comment ID **HRU897**

Site ref (if applicable): **LP0766**

Person ID: **1116616**

Name: **Mrs Susan Thompson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I have done this already.

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

Sound Reason:

This site is surrounded by mature trees with preservation orders on them. Now the small field close to Bunney Green where the original entrance to this potential development was planned has been removed there is nowhere an access road could exit onto Hall Lane without cutting down several of these beautiful mature trees. Surely this would be totally outrageous. I strongly disagree with the council that Hall Lane is not subject to flooding. Every time it rains there is a stream running down Hall Lane. When we have heavy rain it turns to a river. Recently the road was completely flooded and closed at Bunney Green and the water came right up to the doors of the cottages. The mature trees on this site help to drain it and if

they are removed the flooding on Hall Lane and Bunney Green will 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/5609116>

Comment ID **HRU902**

Site ref (if applicable):

Person ID: **1181809**

Name: **Mr Paul Stables**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

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 **HRU910**

Site ref (if applicable): **LP0766**

Person ID: **1243653**

Name: **Mr Daniel Hubbard**

Organisation:

Agent ID:

Name:

Organisation:

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 irrespsnible 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” In 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:

Suggested Modifications:

The site should remain Green belt and be protected from development

Comments:

Additional Evidence Link:

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Comment ID **HRU92**

Site ref (if applicable): **LP0766**

Person ID: **1241527**

Name: **Mr Jonathan 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. In addition to the above, I feel I have to question the motives behind the decisions to primarily use Greenbelt for the development of the new housing developments If the area is indeed in desperate need of the housing (which I also question considering the apparently slow turnover of current properties up for sale in Shelf & Northowram) I would have thought the redevelopment of unused mills & other non-greenbelt plots would take precedence. From what I have seen of the "affordable housing" built in the area so far, these are large dwellings with small gardens, busy access roads of a high cost only masked to be of better value by subsidized government schemes. If the reasoning for building in the first place was legitimate, I would have thought redevelopment of non-greenbelt areas into apartments with a smaller footprint would be the option that was proposed. The infrastructure in the area is already under huge strain, many existing roads are untreated with potholes, dense traffic, double parking & unable to sustain the volumes of traffic we currently have. I have seen nothing in the plans that has alleviated my concerns that measures will be successfully in place to support both existing and new inhabitants to the area. Irreversibly destroying the landscape & habitat for nature in the area is something I strongly disagree with for the weak evidence provided in supporting this plan.

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

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

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Comment ID **HRU951**

Site ref (if applicable):

Person ID: **1243676**

Name: **Mr Elaine Caffrey**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

This is very difficult to substantiate

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

Sound Reason:

The plan is based on inflated employment prospects and the housing requirement is to accommodate inward migration from outside the Borough rather than employment growth within the Borough. The unit numbers required would be lower if the employment forecasts were more realistic.

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

Duty to Co-operate Reason:

Suggested Modifications:

A review of employment forecasts and job creation expectations.

Comments:

Additional Evidence Link:

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Comment ID **HRU953**

Site ref (if applicable): **766**

Person ID: **1243676**

Name: **Mr Elaine Caffrey**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Not qualified to respond

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

Sound Reason:

This is green belt land in a rural location. It is a recreational and nature amenity rather than a natural building site. The land floods substantially more often than the report eludes to particularly at the rear of

Bunny Green which was recently under water and cellars are full of water for most of the year. This land is pasture and, along with its surrounding trees, a carboneater which this council is vocally committed to preserve. The serving road is inadequate for a housing development of the proposed scale. The land is riddled with mine shafts but the report does not refer to these. If you want a sinkhole in your street you would buy a house on this site. The site is not surrounded by built up areas on 3 boundaries. It has a single row of terraced country cottages partially on the cusp one boundary the remainder is a country road. There are isolated sporadic farm buildings and individual cottages on the other boundary and fields on the third boundary. One boundary is adjacent to a housing development but not near enough to consider it a natural extension given there is a thick border of substantial trees separating it from the developed area. In essence this is a standalone green belt area and it should remain so.

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

Duty to Co-operate Reason:

Not qualified to comment

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU962**

Site ref (if applicable): **LP0766**

Person ID: **1128088**

Name: **Mr Adrian Holdsworth**

Organisation:

Agent ID:

Name:

Organisation:

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:

The site should be removed from the local plan.

Comments:

Additional Evidence Link:

Comment ID **HRU970**

Site ref (if applicable):

Person ID: **1126690**

Name: **Mr John Hoggard**

Organisation:

Agent ID:

Name:

Organisation:

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 response to comments in 2017 were complacent, inaccurate and ignorant and yet the site was withdrawn, partly due to the objections and perhaps a sudden sense of common sense and fairness. Now it has been restored to the Local Plan, along with other sites in Northowram and Shelf, because of the decision to match housing needs to a totally ridiculous jobs forecast, which seems to assume that thousands of new workers will come into Calderdale from elsewhere, all looking for accommodation in new housing! Are the planners aware that this site was flooded recently, along with the surrounding roads? Yet the Flooding Assessment in 2017 stated that suitable action had been taken and issues resolved! How much worse would this be with concrete round 120 houses? Similarly, the Highways Assessment stated that access to and from Hall Lane would be "appropriate"-whatever that means. Does it mean that drivers would happily add to the congestion in the village and on the main roads, rather than clutter up the minor routes to and through Shibden, Shelf and Queensbury, where no doubt they would meet traffic from the additional sites in Shelf? How can this have "no significant impact" as claimed in this assessment? Other comments have highlighted flaws in the assessments on Ecology, History, Open Space etc as well as the ever-present lack of the necessary infrastructure, which is continually ignored.

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

Duty to Co-operate Reason:

This is not properly explained and therefore I can not support it. There has been consultation, of course, but any concern for local opinion has now been put aside in the revised 'numbers game'.

Suggested Modifications:

This site should be removed from the local plan

Comments:

Additional Evidence Link:

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Comment ID **HRU977**

Site ref (if applicable): **LP0766**

Person ID: **1243818**

Name: **Miss Kate Thwaites**

Organisation:

Agent ID:

Name:

Organisation:

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 **HRU99**

Site ref (if applicable): **LP0766**

Person ID: **1182651**

Name: **Mrs Sandra Whitehead**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

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 massive number of houses already built in recent times in Northowram have already overstretched the infrastructure and caused congestion on roads throughout the village. At certain times of the day traffic trying to exit the Hough at Stump Cross is backed halfway up the Hough and we have seen it backed up as far as Spring Head Manor. The other side of the village is just as frustrating to not only car users but others too. If one gets hind the occasional bus one has no chance of overtaking at a bus stop because the roads are too narrow and/or congested. 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

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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 proposed site should be removed from the local plans.

Comments:

Additional Evidence Link:

Comment ID **HRU998**

Site ref (if applicable): **LP0766**

Person ID: **1123373**

Name: **Mr Derek Armstead**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: 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.  
End of suggested comments

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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## **Main Issues and Council Response**

### **Legal Compliance**

Main Issues:

1. Ineffective public consultation with residents.
2. Disagree with the Council's Green Belt Assessment of this site. The Council has not demonstrated the exceptional circumstances need to justify the release of Green Belt.
4. Inadequate local road network, specifically capacity and congestion. Access via Hall Lane will exacerbate existing congestion issues. Lack of current and future traffic volumes preventing an informed understanding of future problems.
5. Minerals - presence of coal pits and mine openings. Septic tanks within the site which service properties on Upper Lane.
4. Surface water flooding and inadequate drainage system.
5. Ecology - site assessment states no impact on environmentally sensitive areas. It is not clear what is meant by the term 'environmentally sensitive areas'. Site is surrounded by mixed deciduous woodland which provide habitat for birds, mammals and flora.
6. Heritage - Site Assessment states no impact on any heritage asset, but the southern boundary is a listed boundary wall, and the site is adjacent to Grade II\* Listed Marsh Hall Farm. Development should conserve heritage - this does not.
7. Accessibility - Journey times are significantly underestimated, and the area is poorly served by public transport, walking and cycling.
8. Loss of open space.

9. Disagree with the site assessment which gives the impression the site is infill by incorrectly stating that it is surrounded on three sides by residential development.
10. Cumulative impact with other sites in the area, and with level of development taken place in the locality in recent years.
11. Focus should be on regeneration of brownfield sites in town centres.
12. Infrastructure - Lack of/pressure on existing amenities, services and facilities in the local area, e.g. schools, shops, doctors.

#### 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. - 12. These issues have been responded to under 'Soundness'.

#### Test of Soundness

##### Main Issues:

1. Inadequate local road network, specifically capacity, congestion, road safety issues and on-street parking. Access via Hall Lane will exacerbate existing congestion issues. Lack of current and future traffic volumes preventing an informed understanding of future problems.
2. Loss of Green Belt. Green Belt Assessment is incorrect. Creation of urban sprawl. Development will lead to merging of settlements. The parcel within which the site lies performed strongly when assessed in the Green Belt Review.
3. Minerals - presence of coal pits and mine openings. Septic tanks within the site which service properties on Upper Lane.
4. Surface water flooding (particularly on Hall Lane) and inadequate drainage system.
5. Ecology - site assessment states no impact on environmentally sensitive areas. It is not clear what is meant by the term 'environmentally sensitive areas'. Site is surrounded by mixed deciduous woodland which provide habitat for birds, mammals and flora. Impact on species including deer, bats, woodpeckers.
6. Heritage - Site Assessment states no impact on any heritage asset, but the southern boundary is a listed boundary wall, and the site is adjacent to Grade II\* Listed Marsh Hall Farm. Impact on 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.
7. Accessibility - Journey times are significantly underestimated.
8. Loss of open space.
9. Disagree with the site assessment which gives the impression the site is infill by incorrectly stating that it

is surrounded on three sides by residential development.

10. Cumulative impact with other sites in the area, and with level of development taken place in the locality in recent years.

11. Focus should be on regeneration of brownfield sites in town centres. Efficient use of brownfield land would be more appropriate.

12. Infrastructure - Lack of/pressure on existing amenities, services and facilities in the local area, e.g. schools, shops, doctors. Travel times to facilities are longer than stated, and development will worsen these.

13. Worsening of air quality.

14. Too much development in the east of the Borough. More needs to be encouraged in the west.

15. Coal Mining Legacy.

16. Loss of mature trees.

17. The plan is based on inflated employment prospects and the housing requirement is to accommodate inward migration

#### Council's Response:

1. 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. Highways DM consider access from Hall Lane would be appropriate. The Council commissioned transport modelling that is robust and fit for purpose. The Calderdale Strategic Model is not detailed enough to include all minor routes. The impacts on these routes is assessed on a site by site basis by the development control team. 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 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.

Documents EV07.1 Green Belt Review Methodology 2008 and EV07.2 Green Belt Review Methodology 2015 consider the process the Council followed when carrying out its Green Belt Review.

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.

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

3. Non mineral development will be expected to investigate the potential for extraction of the mineral resource prior to development taking place. This is a requirement of Local Plan policy. Issues arising from presence of coal pits or septic tanks should be addressed as part of development proposals.

4. The site lies in Flood Zone 1. However, given the size and greenfield status of the site, a Flood Risk Assessment (including a Hydrological Assessment) would be required in order to assess any risk of flooding and propose mitigation measures to reduce such risks. The Council's Flooding and Drainage Section has commented that mitigation to drainage issues could be secured through green and blue infrastructure such as SuDS and green roofs.

5. The Site Assessment report states that there is likely to be 'some impact on environmentally sensitive areas which can be mitigated'. Appendix 1 lists tree preservation orders and acid grassland/upland heathland as constraints. The Site Assessment Report and Appendix 1 set out the mitigation and enhancement measures suggested by the Council's Conservation (Ecology) section.

A Preliminary Ecological Appraisal has been submitted as part of the site submission. This indicates that there are unlikely to be any adverse ecological impacts caused by development of the site. Mitigation and enhancement measures have been suggested and will be carried forward as site specific considerations. There are trees around the periphery of the site which are subject of a Tree Preservation Order and have been omitted from the developable area.

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 Site Assessment states that there is likely to be 'some impact which could be mitigated'. The assessment highlights that the site is within close proximity to listed assets and that a HIA has been undertaken, and as a result of this, the developable area has been amended. The Site Specific Considerations require the HIA to be considered in any proposal for the site. 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.

7. Accessibility modelling has been undertaken by West Yorkshire Combined Authority which takes into account the most recent integrated transport networks and public transport timetables. The methodology used for assessing accessibility is within the appendices of the Site Assessment Methodology document.

8. The 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 catchments. However if the site is designated for housing, open space would be required as part of any development since there are deficiencies in other typologies. Although the site is used for recreation this cannot be safeguarded since it is private land and it is not designated as open space.

9. The site is bounded by the Urban Area on two sides, however there is residential development to the west. It is therefore considered the site has a strong relationship to the urban area. In terms of an assessment of the potential for urban sprawl, the Green Belt Review of the site poses the question whether the Green Belt site is connected by two or less boundaries to the built up area.

10. 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.

11. 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.

12. 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.

13. 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.

14. The west of the Borough is dominated by the Special Protection Area and Special Area of Conservation. The Council has sought to minimise any impacts on these designated areas. Neighbourhood Plans are being brought forward in the upper Calder Valley and are looking to allocate land for development there. 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.

15. 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.

16. In light of the mature trees the developable area has been reduced to exclude the boundary trees. An additional 10m buffer has also been excluded from the developable area as recommended by the Conservation Officer (Ecology).

17. 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). Whilst the Council has maintained its economic growth ambitions, in adopting the baseline growth scenario for the latter part of the Plan period, it has tempered forecast economic growth in the longer term.

### **Duty to Co-operate**

#### **Main Issues:**

1. Disagree with the Council's Green Belt Assessment of this site. The land should remain Green Belt.
2. Insufficient advertising of the proposals for residents to be able to respond.

#### **Council's Response:**

1. This issue has been responded to under 'Soundness'.
2. This issue has been responded to under "Legal Compliance".

### **Suggested Modifications**

1. The site should be removed from the Local Plan and should remain as Green Belt.
2. Utilise brownfield sites.
3. Building within 500m of the Shibden Valley should be halted.
4. 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 required to meet the Council's housing need. It 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, only using the most sensitive Green Belt when all alternative sites were used.
3. No change required - A Heritage Impact Assessment (HIA) has been carried out in order to assess the impact of development of this site. The Council considers the HIA adequately assesses the impact of development on the nearby Heritage Assets and suggests any mitigation measures that may be required.
4. 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 **HRU1003**

Site ref (if applicable): **LP1034**

Person ID: **1123373**

Name: **Mr Derek Armstead**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement.

Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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. This should not be part of 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 **HRU1015**

Site ref (if applicable):

Person ID: **1243846**

Name: **Mrs Susan Fox**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by

traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1024**

Site ref (if applicable): **LP1034**

Person ID: **1243849**

Name: **Mr Robert Fox**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement.

Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

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 33 and 36 mins, more than twice the time shown on the assessment.

Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1028**

Site ref (if applicable):

Person ID: **1243851**

Name: **Mr Joshua Fox**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement.

Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

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 33 and 36 mins, more than twice the time shown on the assessment.

Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

PLEASE REMOVE FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

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Comment ID **HRU107**

Site ref (if applicable): **LP1034**

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 Ward, 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 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 **HRU1077**

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 LP1034 Land off Soaper Lane Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt. Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1091**

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 LP1034 Land off Soaper Lane Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt. Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic

from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1099**

Site ref (if applicable): **LP1034**

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 LP1034 Land off Soaper Lane Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip.

Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt. Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1155**

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: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement.

Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

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 33 and 36 mins, more than twice the time shown on the assessment.

Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1174**

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: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed

through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1180**

Site ref (if applicable): **LP1034**

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:

Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only

two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

**Highways:** This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

**Environment:** There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

**Ecology:** I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement.

**Historic Environment:** This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

**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 33 and 36 mins, more than twice the time shown on the assessment.

**Additional Comments:** This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1201**

Site ref (if applicable): **lp1034**

Person ID: **1243924** Name: **Mr Wesley Mellor** Organisation:

Agent ID: Name: Organisation:

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 LP1034 Land off Soaper Lane Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt. Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1211**

Site ref (if applicable): **LP1034**

Person ID: **1243923**

Name: **Mrs Lauren Mellor**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1214**

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: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted

sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement.

Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

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 33 and 36 mins, more than twice the time shown on the assessment.

Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU125**

Site ref (if applicable): **LP1034**

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:

**Greenbelt:** The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

**Highways:** This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

**Environment:** There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

**Ecology:** I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement.

**Historic Environment:** This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

**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 33 and 36 mins, more than twice the time shown on the assessment.

**Additional Comments:** This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1261**

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 LP1034 Land off Soaper Lane Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt. Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1267**

Site ref (if applicable): **LP1034**

Person ID: **1102440**

Name: **Mrs Ann Harris**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034

fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: s a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement.

Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

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 33 and 36 mins, more than twice the time shown on the assessment.

Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1275**

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 LP1034 Land off Soaper Lane Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt. Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1324**

Site ref (if applicable): **LP1034**

Person ID: **1125260**

Name: **Mr Adam Redman**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit recorded on this site on Coal

Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

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Comment ID **HRU1334**

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: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their

conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement.

Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

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 33 and 36 mins, more than twice the time shown on the assessment.

Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

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Comment ID **HRU1348**

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 LP1034 Land off Soaper Lane Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt. Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

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Comment ID **HRU135**

Site ref (if applicable): **LP1034**

Person ID: **1124475**

Name: **Mr Peter Horne**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey

should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU139**

Site ref (if applicable): **lp1034**

Person ID: **1121289**

Name: **Mr Tony Hubbert**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

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Comment ID **HRU1448**

Site ref (if applicable): **LP1034**

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: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement.

Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

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 33 and 36 mins, more than twice the time shown on the assessment.

Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1518**

Site ref (if applicable): **LP1034**

Person ID: **368488**

Name: **Mr & Mrs E Archbold**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly

subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. This land forms part of a wildlife corridor allowing deer and other species to move from nearby wooded areas further south across these and other fields and into Shibden Valley. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

Retain this site in greenbelt.

Comments:

Additional Evidence Link:

Comment ID **HRU157**

Site ref (if applicable): **Lp1034**

Person ID: **1181934**

Name: **Mrs Debra Moxon**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

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Comment ID **HRU1577**

Site ref (if applicable): **LP1034**

Person ID: **1244128**

Name: **mrs Alison 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: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement.

Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

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 33 and 36 mins, more than twice the time shown on the assessment.

Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

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Comment ID **HRU1595**

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: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly

subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU161**

Site ref (if applicable): **LP1034**

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:

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

Duty to Co-operate Reason:

Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their

conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement.

Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

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 33 and 36 mins, more than twice the time shown on the assessment.

Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

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Comment ID **HRU1626**

Site ref (if applicable): **LP1034**

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:

Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement.

Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

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 33 and 36 mins, more than twice the time shown on the assessment.

Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1634**

Site ref (if applicable):

Person ID: **1244161**

Name: **Mr Chris Armitage**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1034 Land off Soaper Lane Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt. Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally

sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1641**

Site ref (if applicable): **LP1034**

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 site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. Taken together with these linked sites they will create coalescence between Shelf (Calderdale) and Buttershaw (Bradford). The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, we challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. We believe this site fulfils four of the five purposes of Green Belt and must be regarded as MOST SENSITIVE. Sustainability: The SA for this site

records 11 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:** This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. The Burned Road arm of the junction is sub-standard and not wide enough to take traffic entering and leaving at the same time, this would create dangerous situations for traffic using the A6036 through route. Traffic lights at this junction would be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

**Environment:** There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. We have evidence of active 'High Risk' sink holes on linked site LP1036, this evidence has been submitted to the Coal Authority for investigation. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

**Ecology:** We challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement.

**Historic Environment:** This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

**Accessibility:** We 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 33 and 36 mins, more than twice the time shown on the assessment. Worryingly, these incorrect accessibility assessments have been used to support positive outcomes in the Sustainability Assessment so they have a double impact.

**Additional Comments:** This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

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Comment ID **HRU168**

Site ref (if applicable): **LP1034**

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: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly

subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1707**

Site ref (if applicable): **LP1034**

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 site is unnecessary for the achievement of the Council's housing requirement. Further concentration on brownfield/under-utilised sites, 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:

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Comment ID **HRU1719**

Site ref (if applicable): **LP1034**

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 LP1034 Land off Soaper Lane Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt. Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally

sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1749**

Site ref (if applicable): **LP1034**

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:

Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt. Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the

Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt. Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 should remain green belt

Comments:

Additional Evidence Link:

Comment ID **HRU180**

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: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a

distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

**Highways:** This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

**Environment:** There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

**Ecology:** I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement.

**Historic Environment:** This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

**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 33 and 36 mins, more than twice the time shown on the assessment.

**Additional Comments:** This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

The site should be removed from the local plan

Comments:

Additional Evidence Link:

Comment ID **HRU197**

Site ref (if applicable): **LP1034**

Person ID: **1118015** Name: **Mr Michael Halliday** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1034 Land off Soaper Lane Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt. Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU2012**

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 has control of both of these sites [1034 & 1035] which are located adjacent to each other. Both sites were previously proposed to be allocated in the Local Plan Initial Draft (2017) and were 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 sites are suitable and in a 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.

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 **HRU203**

Site ref (if applicable): **LP1034**

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".

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

Sound Reason:

These are my comments for site LP1034 Land off Soaper Lane Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt. Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and

demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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

**HRU212**

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:

These are my comments for site LP1034 Land off Soaper Lane Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt. Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU219**

Site ref (if applicable): **LP1034**

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?:

Sound Reason:

These are my comments for site LP1034 Land off Soaper Lane Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt. Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded

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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:

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Comment ID **HRU227**

Site ref (if applicable): **LP1034**

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 LP1034 Land off Soaper Lane Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt. Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other

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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:

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Comment ID **HRU237**

Site ref (if applicable): **LP1034**

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:** The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

**Highways:** This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

**Environment:** There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

**Ecology:** I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement.

**Historic Environment:** This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

**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 33 and 36 mins, more than twice the time shown on the assessment.

**Additional Comments:** This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU248**

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: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement.

Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU261**

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:** The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

**Highways:** This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at

Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

I propose that the land remain as Green Belt.

Comments:

Additional Evidence Link:

Comment ID **HRU262**

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: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a

distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement.

Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

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 33 and 36 mins, more than twice the time shown on the assessment.

Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

I propose that the land remain as Green Belt.

Comments:

Additional Evidence Link:

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Comment ID **HRU263**

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 site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement.

Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

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 33 and 36 mins, more than twice the time shown on the assessment.

Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

I propose that the land remain as Green Belt.

Comments:

Additional Evidence Link:

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Comment ID **HRU271**

Site ref (if applicable): **LP1034**

Person ID: **1131102**

Name: **Mr Phil Taylor**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

**Greenbelt:** The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

**Highways:** This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

**Environment:** There is an old Coal Pit recorded on this site on Coal

Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

I propose that the land remain as Green Belt.

Comments:

Additional Evidence Link:

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Comment ID **HRU279**

Site ref (if applicable): **LP1034**

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 LP1034 Land off Soaper Lane Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The

negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt. Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU286**

Site ref (if applicable): **LP1034**

Person ID: **1116568**

Name: **Mrs Pauline Stead**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement.

Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

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 33 and 36 mins, more than twice the time shown on the assessment.

Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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

**HRU298**

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: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old

mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU305**

Site ref (if applicable): **LP1034**

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: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their

conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement.

Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

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 33 and 36 mins, more than twice the time shown on the assessment.

Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU328**

Site ref (if applicable): **LP1034**

Person ID: **1242393**

Name: **Mr Simon Brannan**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement.

Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

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 33 and 36 mins, more than twice the time shown on the assessment.

Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU334**

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: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old

mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU348**

Site ref (if applicable): **LP1034**

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow,

winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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.

Do you consider that the plan 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 **HRU354**

Site ref (if applicable): **LP1034**

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:** The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

**Highways:** This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

**Environment:** There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

**Ecology:** I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement.

**Historic Environment:** This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

**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 33 and 36 mins, more than twice the time shown on the assessment.

**Additional Comments:** This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU355**

Site ref (if applicable): **LP1034**

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: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement.

Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU380**

Site ref (if applicable): **LP1034**

Person ID: **1183442**

Name: **Mr Daniel Cook**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt. Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded

junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU384**

Site ref (if applicable): **LP1034**

Person ID: **1183442**

Name: **Mr Daniel Cook**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

**Greenbelt:** The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

**Highways:** This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

**Environment:** There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

**Ecology:** I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement.

**Historic Environment:** This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

**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 33 and 36 mins, more than twice the time shown on the assessment.

**Additional Comments:** This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU387**

Site ref (if applicable): **LP1034**

Person ID: **975323**

Name: **Mr Charles Shaw**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. As a local I have encountered many times a blocked Brow lane especially when refuge and ambulances are in the area this is due to the volume of parked traffic making Brow lane a single track road. Traffic on the A6036 cannot access Brow Lane so subsequently blocks the A6036 in both directions. A recent development in Green Lane which is an extension of Brow Lane has caused a massive increase in traffic flow from both residents and delivery vehicles, at the time of approval by planning Highways department stated the development would bring only 30 additional vehicles to the area, I would suggest it has brought 3 times that amount at the very least. I would suggest the same problem will occur in and around Burned road if development is allowed to go ahead. 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.

Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and

also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU398**

Site ref (if applicable): **LP1034**

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: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes

are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

**Highways:** This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. As highlighted in the recent storms Soaper Lane is also prone to flooding. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

**Environment:** There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

**Ecology:** I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement.

**Historic Environment:** This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

**Accessibility:** I strongly 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 33 and 36 mins, more than twice the time shown on the assessment.

**Additional Comments:** This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU4**

Site ref (if applicable): **LP1034**

Person ID: **1238494** Name: **Miss S Patchett** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

The access to this site from Burned Road and Shelf Moor Road on to the main Bradford to Halifax Road, is totally impractical. Burned Road at its junction with the A6036 is only wide enough for one vehicle and the queues on the main road are sometimes backed up to the roundabout at the Brighthouse and Denholmegate Road at busy times because of the current number of pedestrian crossings and sheer volume of traffic. The road infrastructure in this area needs more than traffic lights at the junctions to sort out the congestion that another 58 houses would create, never mind the adjacent proposed sites It is green belt land and yet another site removed with no consideration of the damage to 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:

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Comment ID **HRU406**

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: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes

are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement.

Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

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 33 and 36 mins, more than twice the time shown on the assessment.

Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU419**

Site ref (if applicable):

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:** The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

**Highways:** This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

**Environment:** There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

**Ecology:** I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement.

**Historic Environment:** This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

**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 33 and 36 mins, more than twice the time shown on the assessment.

**Additional Comments:** This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

Take off the Local Plan

Comments:

Additional Evidence Link:

Comment ID **HRU432**

Site ref (if applicable): **LP1034**

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:

Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey

should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU445**

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 LP1034 Land off Soaper Lane Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfill Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfills

four of the five purposes of Green Belt. Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU48**

Site ref (if applicable): **LP1034**

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 LP1034 Land off Soaper Lane Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt. Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU482**

Site ref (if applicable): **LP1034**

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:

The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt. Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be

carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 would propose that this site remains as part of the green belt.

Comments:

Additional Evidence Link:

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Comment ID **HRU489**

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: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU52**

Site ref (if applicable): **LP1034**

Person ID: **1181207**

Name: **Miss Marie A Quashie**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

This is green belt land that should be maintained to ensure the area keeps its individuality and doesn't simply merge into a bourgh of bradford. The roads in the are only just coping with the traffic at the moment - the narrow winding roads are not suitable for increased traffic flow. I feel the area should remain green belt for future generations !

Do you consider that the plan 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 **HRU524**

Site ref (if applicable):

Person ID: **1092926**

Name: **Miss Christine Firth**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1034 Land off Soaper Lane Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt. Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other

linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU538**

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:** The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

**Highways:** This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

**Environment:** There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

**Ecology:** I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement.

**Historic Environment:** This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

**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 33 and 36 mins, more than twice the time shown on the assessment.

**Additional Comments:** This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU54**

Site ref (if applicable): **lp1034**

Person ID: **1181207**

Name: **Miss Marie A Quashie**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1034 Land off Soaper Lane Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt. Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded

by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU546**

Site ref (if applicable): **LP1034**

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:

These are my comments for site LP1034 Land off Soaper Lane Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt. To build on this land will completely remove any notion of Shelf being a historic village within Calderdale, and simply join the village to the mass urban sprawl of Bradford Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the

A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Local flooding will only be increased by the development of this area. Recent events have shown these to be increasing in frequency and intensity. To develop and concrete over a greenbelt local floodplain area will only have a severe detrimental knock-on effect on the surrounding area and properties Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU563**

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: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement.

Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

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 33 and 36 mins, more than twice the time shown on the assessment.

Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU58**

Site ref (if applicable): **LP1034**

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:

Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey

should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

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Comment ID **HRU590**

Site ref (if applicable): **LP1034**

Person ID: **717396**

Name: **Mrs Hoare**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt. Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is

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

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU617**

Site ref (if applicable): **LP1034**

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 LP1034 Land off Soaper Lane Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt. Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU635**

Site ref (if applicable): **LP1034**

Person ID: **1093075**

Name: **Mrs Alison Cooper**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey

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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 **HRU660**

Site ref (if applicable):

Person ID: **1243083**

Name: **Mrs Gillian Marks**

Organisation:

Agent ID:

Name:

Organisation:

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 LP1034 Land off Soaper Lane Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils

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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 **HRU664**

Site ref (if applicable): **lp1034**

Person ID: **1121443**

Name: **Mrs Christine Moussavi**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1034 Land off Soaper Lane Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt. Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU679**

Site ref (if applicable): **LP1034**

Person ID: **1122554**

Name: **Mr Hadi Moussavi**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a

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

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU738**

Site ref (if applicable): **LP1034**

Person ID: **514242**

Name: **Mrs Barbara Tempest**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes

are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

**Highways:** This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

**Environment:** There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

**Ecology:** I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement.

**Historic Environment:** This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

**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 33 and 36 mins, more than twice the time shown on the assessment.

**Additional Comments:** This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU74**

Site ref (if applicable): **LP1034**

Person ID: **1094032**

Name: **Mrs Sue Chadwick**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1034 Land off Soaper Lane Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt. Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU81**

Site ref (if applicable): **LP1034**

Person ID: **1177730**

Name: **Mr Eric Andrew Whitehead**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a

great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU85**

Site ref (if applicable): **LP1034**

Person ID: **1092924**

Name: **Mrs Lisa 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: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU853**

Site ref (if applicable):

Person ID: **1241010**

Name: **Mr Carl Pope**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1034 Land off Soaper Lane Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt. Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 fully 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 **HRU885**

Site ref (if applicable):

Person ID: **1122593**

Name: **Ms Janet Griffiths**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1034 Land off Soaper Lane Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt. Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future

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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 **HRU905**

Site ref (if applicable):

Person ID: **1181809**

Name: **Mr Paul Stables**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU95**

Site ref (if applicable): **LP1034**

Person ID: **1241527**

Name: **Mr Jonathan Shaw**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement.

Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

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 33 and 36 mins, more than twice the time shown on the assessment.

Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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. In addition to the above, I feel I have to question the motives behind the decisions to primarily use Greenbelt for the development of the new housing developments If the area is

indeed in desperate need of the housing (which I also question considering the apparently slow turnover of current properties up for sale in Shelf & Northowram) I would have thought the redevelopment of unused mills & other non-greenbelt plots would take precedence. From what I have seen of the "affordable housing" built in the area so far, these are large dwellings with small gardens, busy access roads of a high cost only masked to be of better value by subsidized government schemes. If the reasoning for building in the first place was legitimate, I would have thought redevelopment of non-greenbelt areas into apartments with a smaller footprint would be the option that was proposed. The infrastructure in the area is already under huge strain, many existing roads are untreated with potholes, dense traffic, double parking & unable to sustain the volumes of traffic we currently have. I have seen nothing in the plans that has alleviated my concerns that measures will be successfully in place to support both existing and new inhabitants to the area. Irreversibly destroying the landscape & habitat for nature in the area is something I strongly disagree with for the weak evidence provided in supporting this plan.

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

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

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Comment ID **HRU950**

Site ref (if applicable):

Person ID: **1243179**

Name: **Miss Suzanne Tempest**

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 **HRU983**

Site ref (if applicable): **LP1034**

Person ID: **1243818**

Name: **Miss Kate Thwaites**

Organisation:

Agent ID:

Name:

Organisation:

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 LP1034 Land off Soaper Lane Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt. Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. 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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

## **Main Issues and Council Response**

### **Legal Compliance**

Main Issues:

1. No evidence all other reasonable options have been considered prior to amendments to Green Belt, including considering all brownfield sites.

Council's Response:

1. This issue has been dealt with under 'Soundness'.

### **Test of Soundness**

Main Issues:

1. Site access is unsuitable. Site should be considered alongside other sites in the locality.
2. Inadequate local road network, specifically capacity, congestion and road safety, with flood risk being an additional issue. Lack of current and future traffic volumes preventing an informed understanding of future problems.
3. Loss of Green Belt. Green Belt Assessment is incorrect and needs to be challenged.
4. Minerals - Coal Authority records show an old coal pit on the site. Site is within a 'Development High Risk' area. Full geotechnical survey should be undertaken prior to allocation.
5. Ecology - disagree with statement that development will have no impact on environmentally sensitive area.
6. Heritage - Boundary dry stone walls have been recommended for retention by the Conservation (Heritage) section. However, they will be destroyed by development in widening road and creating site access.

7. Accessibility - Journey times are significantly underestimated.

8. Cumulative impact with other sites in the area.

9. Focus should be on regeneration of brownfield sites in town centres. Efficient use of brownfield land would be more appropriate.

Council's Response:

1. The site can be accessed from the eastern side of Soaper Lane. An appropriate access is possible with the footway improvement identified. In addition, an indicative masterplan has been submitted demonstrating access arrangements to LP1034 and LP1035.

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. Highways DM have suggested mitigation could include traffic signals. Impacts and mitigation will be assessed through the Transport Statement. The Council considers that the evidence submitted supports and justifies the content of the Local Plan.

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. 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.

5. The Site Assessment Report acknowledges that development may have some impact on environmentally sensitive areas but these can be mitigated. The mitigation measures are set out in the Site Specific Considerations.

6. The Conservation (Heritage) Section have assessed the site and concluded that development of the site is unlikely to result in harm to any designated heritage asset. A recommendation regarding retention of the boundary walls for this site was not included in their assessment.

7. Accessibility modelling has been undertaken by West Yorkshire Combined Authority which takes into account the most recent integrated transport networks and public transport timetables. The methodology used for assessing accessibility is within the appendices of the Site Assessment Methodology document.

8. The 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.

9. 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 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. Focus should be on regeneration of brownfield sites in town centres. Efficient use of brownfield land would be more appropriate.

### **Duty to Co-operate**

#### **Main Issues:**

1. Loss of Green Belt. Green Belt Assessment is incorrect.
2. Site access is unsuitable. Site should be considered alongside other sites in the locality.
3. Inadequate local road network, specifically capacity, congestion and road safety. Lack of current and future traffic volumes preventing an informed understanding of future problems.
4. Heritage - Boundary dry stone walls have been recommended for retention by the Conservation (Heritage) section.
5. Minerals - Coal Authority records show an old coal pit on the site. Site is within a 'Development High Risk' area. Full geological survey should be undertaken prior to allocation.
6. Ecology - disagree with statement that development will have no impact on environmentally sensitive area.
7. Accessibility - Journey times are significantly underestimated.
8. Cumulative impact with other sites in the area.
9. Focus should be on regeneration of brownfield sites in town centres. Efficient use of brownfield land would be more appropriate.

#### **Council's Response:**

1. - 9. These issues have been responded to under Soundness.

### **Suggested Modifications**

1. Remove the site from the Local Plan and land is retained as Green Belt.

**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.

## Representations

Comment ID **HRU1022**

Site ref (if applicable): **LP1035**

Person ID: **1243849**

Name: **Mr Robert Fox**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The site is almost completely isolated from the urban area being linked by the gardens of only two houses at the extreme western tip. Together with adjacent LP1035, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. The Council's assessment concludes that LP1034 fulfils only two of the purposes of Greenbelt established by NPPF: Purpose I - 'to check the unrestricted sprawl of large built-up areas', and Purpose V - 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. However, I challenge in the strongest possible terms their conclusion that it does not also fulfil Purposes II and III. The negative answers arrived at for these purposes are grossly subjective and incorrect. I believe this site fulfils four of the five purposes of Green Belt.

Highways: This site needs to be assessed alongside adjacent sites LP1035, LP1036 and LP1037 to which it is linked. Access to LP1034 will be onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding road which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

Ecology: I challenge the Council's site assessment which concludes that development will have no impact on environmentally sensitive areas. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement.

Historic Environment: This site and LP1035-1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

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 33 and 36 mins, more than twice the time shown on the assessment. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

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Comment ID **HRU1023**

Site ref (if applicable): **LP1035**

Person ID: **1243849**

Name: **Mr Robert Fox**

Organisation:

Agent ID:

Name:

Organisation:

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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic

lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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. Additional traffic on Burned Road will be dangerous for the old folk living in designated old people's housing. Flooding is already an issue and removing greenbelt will make this much worse and threaten housing already built in this area of Shelf.

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 **HRU1029**

Site ref (if applicable): **LP1035**

Person ID: **1243851**

Name: **Mr Joshua Fox**

Organisation:

Agent ID:

Name:

Organisation:

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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 FROM LOCAL PLAN

Comments:

Additional Evidence Link:

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Comment ID **HRU1078**

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 LP1035 - Land at 30 Burned Road, Shelf Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one

of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

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Comment ID **HRU1093**

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 LP1035 - Land at 30 Burned Road, Shelf Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1097**

Site ref (if applicable): **PL1035**

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:

Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for

LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1156**

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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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

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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 **HRU1175**

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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old

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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 **HRU1203**

Site ref (if applicable): **lp1035**

Person ID: **1243924**

Name: **Mr Wesley Mellor**

Organisation:

Agent ID:

Name:

Organisation:

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 LP1035 - Land at 30 Burned Road, Shelf Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic

gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1216**

Site ref (if applicable): **LP1035**

Person ID: **1243923**

Name: **Mrs Lauren Mellor**

Organisation:

Agent ID:

Name:

Organisation:

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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

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Comment ID **HRU1262**

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 LP1035 - Land at 30 Burned Road, Shelf Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine

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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 **HRU127**

Site ref (if applicable): **LP1035**

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:

Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This

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

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU1277**

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 LP1035 - Land at 30 Burned Road, Shelf Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1280**

Site ref (if applicable): **LP1035**

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:

reenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of

'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1331**

Site ref (if applicable): **LP1035**

Person ID: **1125260**

Name: **Mr Adam Redman**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This

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

Duty to Co-operate Reason:

Suggested Modifications:

HIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU1337**

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:

These are my comments for site LP1035 - Land at 30 Burned Road, Shelf Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

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Comment ID

**HRU1349**

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 LP1035 - Land at 30 Burned Road, Shelf Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g.

water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

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Comment ID **HRU136**

Site ref (if applicable): **LP1035**

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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its

length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1362**

Site ref (if applicable): **LP035**

Person ID: **1243975**

Name: **Mrs Tracey Bottomley**

Organisation:

Agent ID:

Name:

Organisation:

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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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. Furthermore there are regular sightings of a family of deer in this and the adjacent fields. Building on this land would demolish their habitat as well as that of other wild animals including bats. 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 **HRU140**

Site ref (if applicable): **lp1035**

Person ID: **1121289**

Name: **Mr Tony Hubbert**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This

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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:

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Comment ID **HRU1408**

Site ref (if applicable): **LP1035**

Person ID: **1243975**

Name: **Mrs Tracey Bottomley**

Organisation:

Agent ID:

Name:

Organisation:

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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone

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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 **HRU1450**

Site ref (if applicable): **LP1035**

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: This site together with adjacent LP1034, 1036 and 1037 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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:

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Comment ID **HRU1519**

Site ref (if applicable): **LP1035**

Person ID: **368488**

Name: **Mr & Mrs E Archbold**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. This land forms part of a wildlife corridor allowing deer and other species to move from nearby wooded areas further south across these and other fields and into Shibden Valley. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

Retain this site in greenbelt.

Comments:

Additional Evidence Link:

Comment ID **HRU156**

Site ref (if applicable): **Lp1035**

Person ID: **1181934**

Name: **Mrs Debra Moxon**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended be kept. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

Comments:

Additional Evidence Link:

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Comment ID **HRU1563**

Site ref (if applicable): **LP1035**

Person ID: **1244128**

Name: **mrs Alison 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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This

is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN.

Comments:

Additional Evidence Link:

Comment ID **HRU1599**

Site ref (if applicable): **LP1035**

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:

Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1602**

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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no

obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU162**

Site ref (if applicable): **LP1035**

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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane

which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1637**

Site ref (if applicable):

Person ID: **1244161**

Name: **Mr Chris Armitage**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1035 - Land at 30 Burned Road, Shelf Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1644**

Site ref (if applicable): **LP1035**

Person ID: **1171108**

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

Organisation: **Chairperson SNLPP**

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The Council's Green Belt assessment for this site is utter nonsense and we challenge it in the strongest possible terms. For example, when considering Purpose I, it provides 5 positive outcomes and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by only two gardens. Together with adjacent LP1034, 1036 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. Taken together with these linked sites they will create coalescence between Shelf (Calderdale) and Buttershaw (Bradford). Sustainability: The SA for this site records 11 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: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. The Burned Road arm of the junction is sub-standard and not wide enough to take traffic entering and leaving at the same time, this would create dangerous situations for traffic using the A6036 through route. Traffic lights at this junction would be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf

Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. We have evidence of active 'High Risk' sink holes on linked site LP1036, this evidence has been submitted to the Coal Authority for investigation. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

Ecology: We challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement.

Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Worryingly, these incorrect accessibility assessments have been used to support positive outcomes in the Sustainability Assessment so they have a double impact.

Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

Comment ID **HRU1660**

Site ref (if applicable): **LP1035**

Person ID: **1244158**

Name: **Mr Clifford Organ**

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 parcel of land and the adjoining fields form a green belt barrier that separates Calderdale and Bradford. The change from Green belt will mean that there is a continuous urban sprawl. Today following recent rain and thawing snow the field was flooded like a lake. Development will mean there is a large need for water storage or water run off will result in local flooding as current pipes cannot cope. These are my comments for site LP1035 - Land off Burned Road, Shelf Greenbelt: This site together with adjacent LP1034, 1036 and 1037 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU169**

Site ref (if applicable): **LP1035**

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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1712**

Site ref (if applicable): **LP1035**

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 site is unnecessary for the achievement of the Council's housing requirement. Further concentration on brownfield/under-utilised sites, 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:

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Comment ID **HRU1723**

Site ref (if applicable): **LP1035**

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 LP1035 - Land at 30 Burned Road, Shelf Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when

considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1757**

Site ref (if applicable): **LP1035**

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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

Land should remain green belt

Comments:

Additional Evidence Link:

Comment ID **HRU182**

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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old

Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

The site should be removed from the local plan

Comments:

Additional Evidence Link:

Comment ID **HRU198**

Site ref (if applicable): **LP1035**

Person ID: **1118015**

Name: **Mr Michael Halliday**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1035 - Land at 30 Burned Road, Shelf Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic

gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

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Comment ID **HRU2013**

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 has control of both of these sites [1034 & 1035] which are located adjacent to each other. Both sites were previously proposed to be allocated in the Local Plan Initial Draft (2017) and were 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 sites are suitable and in a 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.

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>

Comment ID **HRU204**

Site ref (if applicable): **L1035**

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".

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

Sound Reason:

Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of

sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU213**

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:

These are my comments for site LP1035 - Land at 30 Burned Road, Shelf Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this

already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU220**

Site ref (if applicable): **LP1035**

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 LP1035 - Land at 30 Burned Road, Shelf Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU228**

Site ref (if applicable): **LP1035**

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 LP1035 - Land at 30 Burned Road, Shelf Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, which would increase the number of

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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 **HRU238**

Site ref (if applicable): **LP1035**

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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

THE SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU249**

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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban

area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU264**

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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

I propose that the land remain as Green Belt.

Comments:

Additional Evidence Link:

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Comment ID

**HRU265**

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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no

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

Duty to Co-operate Reason:

Suggested Modifications:

I propose that the land remain as Green Belt.

Comments:

Additional Evidence Link:

Comment ID **HRU266**

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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting

with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

I propose that the land remain as Green Belt.

Comments:

Additional Evidence Link:

Comment ID **HRU272**

Site ref (if applicable): **LP1035**

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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

I propose that the land remain as Green Belt.

Comments:

Additional Evidence Link:

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Comment ID **HRU280**

Site ref (if applicable): **LP1035**

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 LP1035 - Land at 30 Burned Road, Shelf Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g.

LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU292**

Site ref (if applicable): **LP1035**

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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing

pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU300**

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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU329**

Site ref (if applicable): **LP1035**

Person ID: **1242393**

Name: **Mr Simon Brannan**

Organisation:

Agent ID:

Name:

Organisation:

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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and

Shelf Ward, 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 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 **HRU335**

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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU349**

Site ref (if applicable): **LP1035**

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by

NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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.

Do you consider that the plan 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 **HRU353**

Site ref (if applicable): **LP1035**

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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU356**

Site ref (if applicable): **LP1035**

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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls

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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 **HRU381**

Site ref (if applicable): **LP1035**

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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing

pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU390**

Site ref (if applicable): **LP1035**

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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. Access can be easily blocked within Burned Road by refuse trucks and ambulances as local residents have already encountered within the area on numerous occasions. Highways estimations for a new development in Green Lane assessed 30 additional vehicles for 30 new houses, the actual amount is 3 times that and the small narrow lanes are continually blocked. Traffic assessment need to make a very detailed research before committing any new development in this area as a couple of new traffic lights will not be sufficient to avert traffic 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU399**

Site ref (if applicable): **LP1035**

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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This

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

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU408**

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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting

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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 **HRU433**

Site ref (if applicable): **LP1035**

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:

Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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

HRU444

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 LP1035 - Land at 30 Burned Road, Shelf Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation

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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 **HRU483**

Site ref (if applicable): **LP1035**

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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone

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

Duty to Co-operate Reason:

Suggested Modifications:

I would propose that this site remains part of the green belt.

Comments:

Additional Evidence Link:

Comment ID **HRU49**

Site ref (if applicable): **LP1035**

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 LP1035 - Land at 30 Burned Road, Shelf Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

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Comment ID **HRU493**

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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or

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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:

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Comment ID **HRU5**

Site ref (if applicable): **LP1035**

Person ID: **1238494**

Name: **Miss S Patchett**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

The access to this site from Burned Road and Shelf Moor Road on to the main Bradford to Halifax Road, is totally impractical. Burned Road at its junction with the A6036 is only wide enough for one vehicle and the queues on the main road are sometimes backed up to the roundabout at the Brighthouse and Denholme Gate Road at busy times because of the current number of pedestrian crossings and sheer volume of traffic. The road infrastructure in this area needs more than traffic lights at the junctions to sort out the congestion that another 27 houses would create, never mind the adjacent proposed sites It is green belt land and yet another site removed with no consideration of the damage to 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:

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Comment ID **HRU523**

Site ref (if applicable):

Person ID: **1092926** Name: **Miss Christine Firth** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1035 - Land at 30 Burned Road, Shelf Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, which would increase the number of houses there by 959. This scale of development will drastically change the nature of our communities 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 **HRU53**

Site ref (if applicable): **LP1035**

Person ID: **1181207**

Name: **Miss Marie A Quashie**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1035 - Land at 30 Burned Road, Shelf Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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 **HRU539**

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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose

and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU548**

Site ref (if applicable): **LP1035**

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:

These are my comments for site LP1035 - Land at 30 Burned Road, Shelf Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 roads and other social infrastructure. Instead 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 **HRU564**

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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old

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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 **HRU591**

Site ref (if applicable): **LP1035**

Person ID: **717396**

Name: **Mrs Hoare**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip

of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU618**

Site ref (if applicable): **LP1035**

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 LP1035 - Land at 30 Burned Road, Shelf Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU636**

Site ref (if applicable): **LP1035**

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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number 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 **HRU662**

Site ref (if applicable):

Person ID: **1243083**

Name: **Mrs Gillian Marks**

Organisation:

Agent ID:

Name:

Organisation:

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 LP1035 - Land at 30 Burned Road, Shelf Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I

challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU666**

Site ref (if applicable): **LP1035**

Person ID: **1121443**

Name: **Mrs Christine Moussavi**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU68**

Site ref (if applicable): **LP1035**

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:

Greenbelt: The Green Belt assessment for LP1035 is at fault. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This does not make sense and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes

that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU681**

Site ref (if applicable): **LP1035**

Person ID: **1122554**

Name: **Mr Hadi Moussavi**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side.

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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 **HRU73**

Site ref (if applicable): **LP1035**

Person ID: **1094032**

Name: **Mrs Sue Chadwick**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1035 - Land at 30 Burned Road, Shelf Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU739**

Site ref (if applicable): **LP1035**

Person ID: **514242**

Name: **Mrs Barbara Tempest**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1035 - Land at 30 Burned Road, Shelf Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological

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

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan.

Comments:

Additional Evidence Link:

Comment ID **HRU82**

Site ref (if applicable): **LP1035**

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

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its

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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 **HRU854**

Site ref (if applicable):

Person ID: **1241010**

Name: **Mr Carl Pope**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

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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 **HRU86**

Site ref (if applicable): **LP1035**

Person ID: **1092924**

Name: **Mrs Lisa 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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls

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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 **HRU886**

Site ref (if applicable):

Person ID: **1122593**

Name: **Ms Janet Griffiths**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1035 - Land at 30 Burned Road, Shelf Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at

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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 **HRU906**

Site ref (if applicable):

Person ID: **1181809**

Name: **Mr Paul Stables**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Home What is the Local Plan? Examination in Public Useful Information Consultation How to register Ways to comment on the Local Plan Sites previously included New Additional Housing Sites LP0766 Hall Lane / Upper Lane LP1044 Hud Hill Farm LP1523 Land at Westercroft Lane LP1034 Land off Soaper Lane LP1035 Land off 30 Burned Road LP1036 Land Shelf Cricket Ground LP1037 Land off Burned Road List of Comments by site LP0766 Hall Lane comments LP1044 Hud Hill Farm comments LP1523 Westercroft Lane comments LP1034 Land off Soaper Lane comments LP1035 Land at 30 Burned Road comments LP1036 Land Shelf Cricket Ground comments LP1037 Land off Burned Road comments Print suggested comments More Home What is the Local Plan? Examination in Public Useful Information Consultation How to register Ways to comment on the Local Plan Sites previously included New Additional Housing Sites LP0766 Hall Lane / Upper Lane LP1044 Hud Hill Farm LP1523 Land at Westercroft Lane LP1034 Land off Soaper Lane LP1035 Land off 30 Burned Road LP1036 Land Shelf Cricket Ground LP1037 Land off Burned Road List of Comments by site LP0766 Hall Lane comments LP1044 Hud Hill Farm comments LP1523 Westercroft Lane comments LP1034 Land off Soaper Lane comments LP1035 Land at 30 Burned Road comments LP1036 Land Shelf Cricket Ground comments LP1037 Land off Burned Road comments Print suggested comments LP1035 - Land at 30 Burned Road Suggested Comments Below you will find our suggested comments for LP1035 Land at 30 Burned Road Please follow our detailed instructions below as they will help you to 'walk through' the commenting process easily. Please remember that these are our 'suggested comments', you may use them as they are or use them as a basis for your own comments Before you can comment on the Local Plan you must login to the consultation portal. Please login to the consultation portal and then return to this window, leaving the consultation portal window open CONSULTATION PORTAL LOGIN Click on the 'Add Comments' link below to open the Local Plan consultation page for LP1035 Land at 30 Burned Road in a new window. This means that both windows [our comments page and the consultation portal] will be open at the same time and this will make the 'copy and paste' function between the pages much easier. You should read the consultation portal page and answer the questions in order. Once you reach the Second Section, you will need to 'copy' the suggested comments below and then go to the consultation portal window and 'paste' into the appropriate box. Add comments for LP1035 Land at 30 Burned Road First Section Local Plan LEGAL COMPLIANCE The Council ask if you consider the plan to be Legally Compliant? Our suggested answer for this question is YES But if you believe that the Local Plan is not legally compliant, you should give details in the box provided Second Section Local Plan SOUNDNESS The Council ask if you consider the plan to be Sound? Our suggested answer for this question is NO Comments below will provide details why SNLPP believe the plan is not sound - you can if you wish use these comments Start of the suggested comments - highlight the comments below and then copy them These are my comments for site LP1035 - Land at 30 Burned Road, Shelf Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management 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 **HRU96**

Site ref (if applicable): **LP1035**

Person ID: **1241527**

Name: **Mr Jonathan 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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. 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If the area is indeed in desperate need of the housing (which I also question considering the apparently slow turnover of current properties up for sale in Shelf & Northowram) I would have thought the redevelopment of unused mills & other non-greenbelt plots would take precedence. From what I have seen of the "affordable housing" built in the area so far, these are large dwellings with small gardens, busy access roads of a high cost only masked to be of better value by subsidized government schemes. If the reasoning for building in the first place was legitimate, I would have thought redevelopment of non-greenbelt areas into apartments with a smaller footprint would be the option that was proposed. The infrastructure in the area is already under huge strain, many existing roads are

untreated with potholes, dense traffic, double parking & unable to sustain the volumes of traffic we currently have. I have seen nothing in the plans that has alleviated my concerns that measures will be successfully in place to support both existing and new inhabitants to the area. Irreversibly destroying the landscape & habitat for nature in the area is something I strongly disagree with for the weak evidence provided in supporting this plan.

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

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU985**

Site ref (if applicable): **LP1035**

Person ID: **1243818**

Name: **Miss Kate Thwaites**

Organisation:

Agent ID:

Name:

Organisation:

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 LP1035 - Land at 30 Burned Road, Shelf Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

## **Main Issues and Council Response**

### **Legal Compliance**

Main Issues:

1. No evidence all other reasonable options have been considered prior to amendments to Green Belt, including considering all brownfield sites.

Council's Response:

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

### **Test of Soundness**

#### Main Issues:

1. Site access is unsuitable. Site should be considered alongside other sites in the locality.
2. Inadequate local road network, specifically capacity, congestion and road safety. Lack of current and future traffic volumes preventing an informed understanding of future problems.
3. Loss of Green Belt. Green Belt Assessment is incorrect and lacks credibility.
4. Minerals - Coal Authority records show an old coal pit on the site. Site is within a 'Development High Risk' area. Full geotechnical survey should be undertaken prior to allocation.
5. Ecology - disagree with the Site Assessment that development will have no ecological impact.
6. Heritage - Boundary dry stone walls have been recommended for retention by the Conservation (Heritage) section. However, they will be destroyed by development in widening road and creating site access.
7. Accessibility - Journey times are significantly underestimated.
8. Cumulative impact with other sites in the area.
9. Focus should be on regeneration of brownfield sites in town centres. Efficient use of brownfield land would be more appropriate.

#### Council's Response:

1. The site can be accessed from the eastern side of Soaper Lane. An appropriate access is possible with the footway improvement identified. In addition, an indicative masterplan has been submitted demonstrating access arrangements to LP1034 and LP1035.
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. Highways DM have suggested mitigation could include traffic signals. Impacts and mitigation will be assessed through the Transport Statement. The Council considers that the evidence submitted supports and justifies the content of the Local Plan. 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.  
In terms of traffic volumes the information is contained in the various Technical Notes. These can be found on the Local Plan section of the Calderdale website under "Evidence Base: Transport"  
For example observed and modelled base traffic is included in Appendix H of the Local Model Validation

Report (October 2016)

Future traffic and the impact in terms of delays are contained in Technical Note 9 “Assessment of Cumulative Impact”.

Any Individual applications would be required to produce a Transport Statement or Assessment detailing the traffic impact.

For larger sites more detailed individual junction models would be required and any mitigating measures identified

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. 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.

5. The Site Assessment Report acknowledges that development may have some impact on environmentally sensitive areas but these can be mitigated. The mitigation measures are set out in the Site Specific Considerations.

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 Conservation (Heritage) Section have assessed the site and concluded that development of the site is unlikely to result in harm to any designated heritage asset. A recommendation regarding retention of the boundary walls for this site was not included in their assessment.

7. Accessibility modelling has been undertaken by West Yorkshire Combined Authority which takes into account the most recent integrated transport networks and public transport timetables. The methodology used for assessing accessibility is within the appendices of the Site Assessment Methodology document.

8. The 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.

9. 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 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.

### **Duty to Co-operate**

Main Issues:

Council's Response:

### **Suggested Modifications**

1. Remove the site from the Local Plan.

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 **HRU1002**

Site ref (if applicable): **LP1036**

Person ID: **1123373**

Name: **Mr Derek Armstead**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

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Comment ID

**HRU1017**

Site ref (if applicable):

Person ID: **1243846**

Name: **Mrs Susan Fox**

Organisation:

Agent ID:

Name:

Organisation:

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 boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1026**

Site ref (if applicable): **LP1036**

Person ID: **1243849**

Name: **Mr Robert Fox**

Organisation:

Agent ID:

Name:

Organisation:

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 boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a

dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

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Comment ID **HRU1030**

Site ref (if applicable): **LP1036**

Person ID: **1243851**

Name: **Mr Joshua Fox**

Organisation:

Agent ID:

Name:

Organisation:

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 boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

PLEASE REMOVE FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

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Comment ID **HRU1079**

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 LP1036 - Land North of Shelf Cricket Ground, Shelf Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1094**

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 LP1036 - Land North of Shelf Cricket Ground, Shelf Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site

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

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU1100**

Site ref (if applicable): **LP1036**

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 LP1036 - Land North of Shelf Cricket Ground, Shelf Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037

to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1157**

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: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1176**

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: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments 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 **HRU1205**

Site ref (if applicable): **lp1036**

Person ID: **1243924**

Name: **Mr Wesley Mellor**

Organisation:

Agent ID:

Name:

Organisation:

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 LP1036 - Land North of Shelf Cricket Ground, Shelf Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor

road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1217**

Site ref (if applicable): **LP1036**

Person ID: **1243923**

Name: **Mrs Lauren Mellor**

Organisation:

Agent ID:

Name:

Organisation:

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 boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to

make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1244**

Site ref (if applicable):

Person ID: **1183639**

Name: **Mr David Spivey**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1036 - Land North of Shelf Cricket Ground, Shelf Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1263**

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 LP1036 - Land North of Shelf Cricket Ground, Shelf Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads

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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 **HRU1278**

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 LP1036 - Land North of Shelf Cricket Ground, Shelf Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access 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:

Comment ID **HRU128**

Site ref (if applicable): **LP1036**

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:

reenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1284**

Site ref (if applicable): **lp1036**

Person ID: **1102440**

Name: **Mrs Ann Harris**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1335**

Site ref (if applicable): **LP1036**

Person ID: **1125260**

Name: **Mr Adam Redman**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation

(Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1338**

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:

These are my comments for site LP1036 - Land North of Shelf Cricket Ground, Shelf Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land

and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

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Comment ID **HRU1351**

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 LP1036 - Land North of Shelf Cricket Ground, Shelf Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1367**

Site ref (if applicable): **LP1036**

Person ID: **1243975** Name: **Mrs Tracey Bottomley** Organisation:

Agent ID: Name: Organisation:

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 boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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. Furthermore there are regular sightings of a family of deer in this and the adjacent fields. Building on this land would demolish their habitat as well as that of other wild animals including bats. 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 **HRU137**

Site ref (if applicable): **LP1036**

Person ID: **1124475**

Name: **Mr Peter Horne**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be

carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU141**

Site ref (if applicable): **lp1036**

Person ID: **1121289**

Name: **Mr Tony Hubbert**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated

by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

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Comment ID **HRU1451**

Site ref (if applicable): **LP1036**

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: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1521**

Site ref (if applicable): **LP1036**

Person ID: **368488**

Name: **Mr & Mrs E Archbold**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

Retain this site in greenbelt.

Comments:

Additional Evidence Link:

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Comment ID **HRU154**

Site ref (if applicable): **Lp1036**

Person ID: **1181934**

Name: **Mrs Debra Moxon**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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 surrounding area is also used as routes home for many primary and secondary pupils - the location of the bus stop at the bottom of clover dale is already a concern due to the amount of traffic - this is likely to get worse. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey

should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 roads and other social infrastructure. Instead the focus of development in Calderdale's Local Plan should be on the regeneration of brownfield sites in sustainable town centres. This area is one frequented by children on a regular basis: sledging in the winter snow; playing hide and seek; dog walking etc. 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:

Comments:

Additional Evidence Link:

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Comment ID **HRU1565**

Site ref (if applicable): **LP1036**

Person ID: **1244128**

Name: **mrs Alison 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: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third

party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability.

Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1607**

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: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1628**

Site ref (if applicable): **LP1036**

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:

Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU163**

Site ref (if applicable): **LP1036**

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: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation

(Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1640**

Site ref (if applicable):

Person ID: **1244161**

Name: **Mr Chris Armitage**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1036 - Land North of Shelf Cricket Ground, Shelf Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land

and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1645**

Site ref (if applicable): **LP1036**

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 boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. Together with adjacent LP1034, 1035 and 1037 it maintains a distinct gap between Shelf and the Bradford built-up area. Taken together with these linked sites they will create coalescence between Shelf (Calderdale) and Buttershaw (Bradford). The existing green belt assessment is highly subjective and lacking in competence. Sustainability: The SA for this site records 2 negative outcomes and 11 uncertain out of a possible 17 and yet is still put forward as positive overall. It's possible that the negative outcomes are a legacy from the original site boundary in the Draft Local Plan which included Shelf Cricket Ground, however, these outcomes could only be assessed as 'uncertain' at best under the current site boundary. 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: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. The Burned Road arm of the junction is sub-standard and not wide enough to take traffic entering and leaving at the same time, this would create dangerous situations for traffic using the A6036 through route. Traffic lights at this junction would be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. We have evidence of active 'High Risk' sink holes on this site, this evidence has been submitted to the Coal Authority for investigation (see photos in attached file 'LP1036 Active Sink holes'). The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Worryingly, these incorrect accessibility assessments have been used to support positive outcomes in the Sustainability Assessment so they have a double impact. Additional Comments: This site is one of 12 proposed new

housing sites in Northowram and Shelf Ward, 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 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/5610197>

Comment ID **HRU170**

Site ref (if applicable): **LP1036**

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: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU1716**

Site ref (if applicable): **LP1036**

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 site is unnecessary for the achievement of the Council's housing requirement. Further concentration on brownfield/under-utilised sites, 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 **HRU1727**

Site ref (if applicable): **LP1036**

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 LP1036 - Land North of Shelf Cricket Ground, Shelf Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site

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

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the Local Plan

Comments:

Additional Evidence Link:

Comment ID **HRU1755**

Site ref (if applicable): **LP1036**

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: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane

which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability.

Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 land should remain green belt

Comments:

Additional Evidence Link:

Comment ID **HRU183**

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: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

The site should be removed from the local plan

Comments:

Additional Evidence Link:

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Comment ID **HRU1969**

Site ref (if applicable):

Person ID: **960147**

Name:

Organisation: **Enterprise Inns**

Agent ID: **960146**

Name: **Mr Stuart Booth**

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 these submissions principally to support the proposed allocation of new sites within the Local Plan to meet the need for new housing over the Plan period, but more specifically in support of site LP1036 ; Land north of Shelf Cricket Ground, Carr House Lane, Shelf, Halifax, which is owned by EI Group Ltd and available for development. This site has, along with adjacent land to the south that forms the cricket pitch and Shoulder of Mutton public house, been promoted by EI Group for a number of years through the Local Plan process since and at pre-application discussions with Planning Officers at the Council. Our latest submission to the Council was a letter to the Planning Policy Team in August 2019 to present our site as available, deliverable and achievable as a residential development in the early stage of the Plan, subject to allocation, in response to the Inspector's requirement for an increased number of new houses to be delivered. It is the northern part of our client's ownership which is now proposed as site LP1036 for allocation, and which currently lies outside the existing settlement boundary of the Local Plan. Land to the south of this, which is located within the existing settlement boundary, is also available for development and we continue to present this part of the site as being suitable for allocation for residential development within the Local Plan and during the Plan period. Both the draft allocated site LP1036 and the land to the south can be developed independently from one-another or combined through development of both sites. We have presented evidence that the site can be accessed from Carr House Lane to the south and from Cloverdale to the east, with the Cloverdale access providing a suitable access to the proposed allocation in the document. We would recommend that at the very least the proposed allocation LP036 is extended to include the access directly from Cloverdale. We support the allocation of site LP1036 referenced in the report, but also present the land to the south that was formerly part of this draft allocation and which equates to an additional 1.5 hectares of land not currently in the green belt and available for residential development. As this land lies within the settlement boundary, we believe this should be allocated alongside the proposed removal of the Green Belt sites in this location and have presented evidence to the Council in relation to the site no longer being needed for its current use, which is an ongoing discussion with the Council referenced in the Site Assessment Report. We anticipate this will be resolved prior to adoption of the Local Plan and would be happy to present our client's position updated at the Examination hearings and support allocation of both the site referenced above and this additional site for inclusion within the Local Plan, and present a scheme for delivery as soon as practicable after allocation of the Plan. The landowner recognises that the development of the cricket pitch would represent the loss of a currently policy-protected sports ground, albeit one no longer required, but would through a planning application seek to improve facilities elsewhere by an appropriate financial contribution to mitigate this loss, and engage with the Council to determine an appropriate level. We wish to promote the site for allocation

within the Local Plan, due to the overwhelming need for new housing, and accept a stipulation within the policy to require an assessment of the need to be completed and an agree mitigation strategy to be in place prior to approval of planning consent. This would be a fairly standard approach to the allocation of land within a planning policy document that seeks to meet needs over the next few years, particularly due to the extent of that need for housing. We note the proposed allocation of sites to the north of site LP1036 and have been in discussions with Persimmon Homes regarding their interest in those sites, with a view to bringing forward a comprehensive development of this land along with LP1036. The inclusion of land to the south, as described above, would also provide further land for housing. Both sites could be developed independently or as part of the wider development of this area. Both sites, LP1036 and the land to the south are shown on the plan below. We would be happy to present our case in support of these allocation at the Examination Hearing.

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

Duty to Co-operate Reason:

Suggested Modifications:

Extend the site to include the land currently within the Urban Area/the cricket pitch.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5632357>

Comment ID **HRU199**

Site ref (if applicable): **LP1036**

Person ID: **1118015**

Name: **Mr Michael Halliday**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1036 - Land North of Shelf Cricket Ground, Shelf Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto

the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

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Comment ID **HRU207**

Site ref (if applicable): **LP1036**

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 circumstance".

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

Sound Reason:

These are my comments for site LP1036 - Land North of Shelf Cricket Ground, Shelf Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads

and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU214**

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:

These are my comments for site LP1036 - Land North of Shelf Cricket Ground, Shelf Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access 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:

Comment ID **HRU221**

Site ref (if applicable): **LP1036**

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 LP1036 - Land North of Shelf Cricket Ground, Shelf Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU2281**

Site ref (if applicable):

Person ID: **1185581**

Name: **Mr Stuart Booth**

Organisation: **J W P C Ltd**

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

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/5635478>

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Comment ID **HRU229**

Site ref (if applicable): **LP1036**

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 LP1036 - Land North of Shelf Cricket Ground, Shelf Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and

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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:

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Comment ID **HRU239**

Site ref (if applicable): **1036**

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: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU250**

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: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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

HRU258

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 boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified 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:

I propose that the land remain as Green Belt.

Comments:

Additional Evidence Link:

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Comment ID **HRU260**

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: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to

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

Duty to Co-operate Reason:

Suggested Modifications:

I propose that the land remain as Green Belt.

Comments:

Additional Evidence Link:

Comment ID **HRU273**

Site ref (if applicable): **LP1036**

Person ID: **1131102**

Name: **Mr Phil Taylor**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and

lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

I propose that the land remain as Green Belt.

Comments:

Additional Evidence Link:

Comment ID **HRU281**

Site ref (if applicable): **LP1036**

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 LP1036 - Land North of Shelf Cricket Ground, Shelf Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU296**

Site ref (if applicable): **LP1036**

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: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU301**

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: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU327**

Site ref (if applicable): **LP1036**

Person ID: **1242393**

Name: **Mr Simon Brannan**

Organisation:

Agent ID:

Name:

Organisation:

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 boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035

and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Carr House Rd junction with Halifax Rd is getting worse by the day, and you are playing roulette trying to get out during rush hour at beginning and end of day due to ever increasing volume of traffic between shelf roundabout and Odsal Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 roads and other social infrastructure. Instead the focus of development in Calderdale's Local Plan should be on the regeneration of brownfield sites in sustainable town centres. This will also place additional pressure on the already pressured local schools, hospitals, Dentist and GP Practices 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 **HRU336**

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: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU351**

Site ref (if applicable): **LP1036**

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: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's

assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

This site should be removed from the local plan.

Suggested Modifications:

This site should removed from the local plan and remain as greenbelt.

Comments:

Additional Evidence Link:

Comment ID **HRU357**

Site ref (if applicable): **LP1036**

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: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from

Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU382**

Site ref (if applicable): **LP1036**

Person ID: **1183442**

Name: **Mr Daniel Cook**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green

Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU388**

Site ref (if applicable): **LP1036**

Person ID: **1242478**

Name: **mr Ian penton**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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. Duty to Co-operate Do you consider that the plan complies with the Duty to Co-operate Yes Modifications I propose that the land remain as Green Belt. Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides

and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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?: **No**

Duty to Co-operate Reason:

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

Suggested Modifications:

Modifications I propose that the land remain as Green Belt.

Comments:

Additional Evidence Link:

Comment ID **HRU391**

Site ref (if applicable): **LP1036**

Person ID: **975323**

Name: **Mr Charles Shaw**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU400**

Site ref (if applicable): **LP1036**

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: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and

also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU409**

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: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to

manage traffic from other proposed allocations. 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.

Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability.

Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU414**

Site ref (if applicable): **LP0136**

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:

These are my comments for site LP1036 - Land North of Shelf Cricket Ground, Shelf Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed

comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU434**

Site ref (if applicable): **LP1036**

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:

Greenbelt: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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

**HRU443**

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 LP1036 - Land North of Shelf Cricket Ground, Shelf Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before

allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU484**

Site ref (if applicable): **LP1036**

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: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated

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Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points.

Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability.

Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

I propose that this site remains in the green belt.

Comments:

Additional Evidence Link:

Comment ID **HRU494**

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:

These are my comments for site LP1036 - Land North of Shelf Cricket Ground, Shelf Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU50**

Site ref (if applicable):

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 LP1036 - Land North of Shelf Cricket Ground, Shelf Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU521**

Site ref (if applicable):

Person ID: **1092926**

Name: **Miss Christine Firth**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1036 - Land North of Shelf Cricket Ground, Shelf Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health 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 **HRU540**

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: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does

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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 **HRU549**

Site ref (if applicable): **LP1036**

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:

These are my comments for site LP1036 - Land North of Shelf Cricket Ground, Shelf Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU565**

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: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU593**

Site ref (if applicable): **LP1036**

Person ID: **717396**

Name: **Mrs Hoare**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine

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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 **HRU619**

Site ref (if applicable): **LP1036**

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 LP1036 - Land North of Shelf Cricket Ground, Shelf Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a

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

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU637**

Site ref (if applicable): **LP1036**

Person ID: **1093075**

Name: **Mrs Alison Cooper**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU663**

Site ref (if applicable):

Person ID: **1243083**

Name: **Mrs Gillian Marks**

Organisation:

Agent ID:

Name:

Organisation:

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 LP1036 - Land North of Shelf Cricket Ground, Shelf Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, which would increase the number of houses

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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 **HRU667**

Site ref (if applicable): **LP1036**

Person ID: **1121443**

Name: **Mrs Christine Moussavi**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. The local highway network in Northowram & Shelf is already congested but no figures for current or future traffic volumes and congestion have been provided,

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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 **HRU683**

Site ref (if applicable): **LP1036**

Person ID: **1122554**

Name: **Mr Hadi Moussavi**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1036 - Land North of Shelf Cricket Ground, Shelf Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides

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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 **HRU69**

Site ref (if applicable): **LP1036**

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:

Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is an unworkable concept. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU72**

Site ref (if applicable): **LP1036**

Person ID: **1094032**

Name: **Mrs Sue Chadwick**

Organisation:

Agent ID:

Name:

Organisation:

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

### Legal Compliance Reason:

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

### Sound Reason:

These are my comments for site LP1036 - Land North of Shelf Cricket Ground, Shelf Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This

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

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan.

Comments:

Additional Evidence Link:

Comment ID **HRU740**

Site ref (if applicable): **LP1036**

Person ID: **514242**

Name: **Mrs Barbara Tempest**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1036 - Land North of Shelf Cricket Ground, Shelf Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens 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 **HRU83**

Site ref (if applicable): **LP1036**

Person ID: **1177730**

Name: **Mr Eric Andrew Whitehead**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version

2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU855**

Site ref (if applicable):

Person ID: **1241010**

Name: **Mr Carl Pope**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1036 - Land North of Shelf Cricket Ground, Shelf Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU87**

Site ref (if applicable): **LP1036**

Person ID: **1092924**

Name: **Mrs Lisa 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: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in

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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:

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Comment ID **HRU887**

Site ref (if applicable):

Person ID: **1122593**

Name: **Ms Janet Griffiths**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1036 - Land North of Shelf Cricket Ground, Shelf Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management 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 **HRU907**

Site ref (if applicable):

Person ID: **1181809**

Name: **Mr Paul Stables**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1036 - Land North of Shelf Cricket Ground, Shelf Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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 **HRU97**

Site ref (if applicable): **LP1036**

Person ID: **1241527** Name: **Mr Jonathan Shaw** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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. In addition to the above, I feel I have to question the motives behind the decisions to

primarily use Greenbelt for the development of the new housing developments If the area is indeed in desperate need of the housing (which I also question considering the apparently slow turnover of current properties up for sale in Shelf & Northowram) I would have thought the redevelopment of unused mills & other non-greenbelt plots would take precedence. From what I have seen of the "affordable housing" built in the area so far, these are large dwellings with small gardens, busy access roads of a high cost only masked to be of better value by subsidized government schemes. If the reasoning for building in the first place was legitimate, I would have thought redevelopment of non-greenbelt areas into apartments with a smaller footprint would be the option that was proposed. The infrastructure in the area is already under huge strain, many existing roads are untreated with potholes, dense traffic, double parking & unable to sustain the volumes of traffic we currently have. I have seen nothing in the plans that has alleviated my concerns that measures will be successfully in place to support both existing and new inhabitants to the area. Irreversibly destroying the landscape & habitat for nature in the area is something I strongly disagree with for the weak evidence provided in supporting this plan.

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

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU986**

Site ref (if applicable): **LP1036**

Person ID: **1243818**

Name: **Miss Kate Thwaites**

Organisation:

Agent ID:

Name:

Organisation:

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 LP1036 - Land North of Shelf Cricket Ground, Shelf Greenbelt: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and

other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

## **Main Issues and Council Response**

### **Legal Compliance**

Main Issues:

1. No evidence all other reasonable options have been considered prior to amendments to Green Belt, including considering all brownfield sites.

Council's Response:

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

## Test of Soundness

### Main Issues:

1. Green Belt - the site boundary has been amended since the Green Belt Review was undertaken, but no revised Green Belt review has taken place. Development would result in a narrow strip of housing surrounded by Green Belt. Green Belt Assessment is incorrect, subjective and lacking in competence.
2. Site access is unsuitable.
3. Inadequate local road network, specifically capacity, congestion and road safety. Lack of current and future traffic volumes preventing an informed understanding of future problems.
4. Minerals - Coal Authority records show an old coal pit on the site. Site is within a 'Development High Risk' area. Full geological survey should be undertaken prior to allocation.
5. Heritage - Boundary dry stone walls have been recommended for retention by the Conservation (Heritage) section. However, they will be destroyed by development in widening road and creating site access.
6. Accessibility - Journey times are significantly underestimated, and the assessments on journey times cannot be relied upon.
7. Cumulative impact with other sites in the area.
8. Focus should be on regeneration of brownfield sites in town centres. More efficient use should be made of these sites.
9. Site boundary should be extended to include the cricket pitch. This is land not within the Green Belt.

### Council's Response:

1. For sites which were comprised part Green Belt and part Urban Area, the Green Belt Review for the site would have solely assessed the Green Belt part. The site boundary has been amended since the Local Plan Initial Draft consultation in 2017, to remove that part of the site which was within the Urban Area. Therefore, there was no need to reassess the site in terms of the Green Belt Review. LP1036 is adjacent to Additional Housing Site LP1034 and LP1035.  
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. 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.
2. An indicative masterplan has been submitted demonstrating access arrangements for sites LP1034 and LP1035 from Soaper Lane. The plan also indicates that development links would be made available to enable the development of site LP1545 (now filtered) along with the northern section of site LP1036. The Highways Development Management Section consider that access from Soaper Lane would be acceptable.
3. 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. It has been noted by Highways DM that as there are a number of preferred sites in this locality, mitigation at the Shelf Moor Road and Burned Road junctions with the A6036 would be needed to accommodate the additional trips; this may require traffic signals. Impacts and mitigation will be assessed through the Transport Statement. The Council considers that the evidence submitted supports and justifies the content of the Local Plan.

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.

In terms of traffic volumes the information is contained in the various Technical Notes. These can be found on the Local Plan section of the Calderdale website under "Evidence Base: Transport"

For example observed and modelled base traffic is included in Appendix H of the Local Model Validation Report (October 2016)

Future traffic and the impact in terms of delays are contained in Technical Note 9 "Assessment of Cumulative Impact".

Any Individual applications would be required to produce a Transport Statement or Assessment detailing the traffic impact.

For larger sites more detailed individual junction models would be required and any mitigating measures identified

4. 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.

5. The Conservation (Heritage) Section have assessed the site and recommended that the site boundary was reduced to avoid harm to any designated heritage asset (Grade II Listed Bethel Church and its setting). A recommendation regarding retention of the boundary walls for this site was not included in their assessment.

6. Accessibility modelling has been undertaken by West Yorkshire Combined Authority which takes into account the most recent integrated transport networks and public transport timetables. The methodology used for assessing accessibility is within the appendices of the Site Assessment Methodology document.

7. The 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.

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 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.

9. The Playing Pitch Strategy 2017 reported that the cricket fields at Northowram Hedge Top and the adjacent club Northowram Fields were being played at over capacity by 5 matches and 58 matches respectively.

Evidence is required that the merging of the Northowram Hedge Top and Shelf Cricket Clubs has not resulted in further over capacity issues which cannot be resolved through investment at Northowram Hedge Top CC as mitigation. Details of the proposed facility improvements are required together with direct evidence from the club that they are satisfied with the proposals and have no ambition to run as separate clubs in the future.

Evidence is also required that the merger of the two clubs has not resulted in further over capacity issues at Northowram Fields CC and that this club has no ambition to use the former Shelf Cricket Club site to ease its over capacity issues. If the proposed development of the former Shelf Cricket Club site will impact on Northowram Fields CC then development should only take place if facility improvements can be carried out at the club as mitigation.

It is also stressed that Sport England need to be consulted on any such proposals.

### **Duty to Co-operate**

Main Issues:

Council's Response:

### **Suggested Modifications**

1. Remove the site from the Local Plan.
2. Extend the site to include land to the south which is within the settlement boundary.

Council's Response:

1. No change required - The Council considers that the evidence submitted supports and justifies the content of the Local Plan.
2. No change required - The Playing Pitch Strategy 2017 reported that the cricket fields at Northowram Hedge Top and the adjacent club Northowram Fields were being played at over capacity by 5 matches and 58 matches respectively.  
Evidence is required that the merging of the Northowram Hedge Top and Shelf Cricket Clubs has not resulted in further over capacity issues which cannot be resolved through investment at Northowram

Hedge Top CC as mitigation. Details of the proposed facility improvements are required together with direct evidence from the club that they are satisfied with the proposals and have no ambition to run as separate clubs in the future.

Evidence is also required that the merger of the two clubs has not resulted in further over capacity issues at Northowram Fields CC and that this club has no ambition to use the former Shelf Cricket Club site to ease it's over capacity issues. If the proposed development of the former Shelf Cricket Club site will impact on Northowram Fields CC then development should only take place if facility improvements can be carried out at the club as mitigation.

It is also stressed that Sport England need to be consulted on any such proposals.

## Representations

Comment ID **HRU1004**

Site ref (if applicable): **LP1037**

Person ID: **1123373** Name: **Mr Derek Armstead** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The 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:

Comments:

Additional Evidence Link:

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Comment ID **HRU1016**

Site ref (if applicable):

Person ID: **1243846**

Name: **Mrs Susan Fox**

Organisation:

Agent ID:

Name:

Organisation:

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: Where to begin to challenge the utter nonsense that is the council's Green Belt assessment for LP1035. For example, when considering Purpose I, it provides 5 positive answers for fulfilling the purpose and only 4 negatives yet the overall conclusion is STILL a negative. The site is linked to the existing urban area by only two domestic gardens at the extreme eastern tip and development would leave a narrow strip of housing surrounded by Green Belt on three sides and connected to the urban area by two gardens. This is beyond credulity and I challenge the whole assessment in the strongest possible terms. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1036 and LP1037 to which it is linked. Access to LP1035 will have to be through LP1034 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit recorded on this site on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Ecology: I challenge the Council's site assessment which concludes that development will have no ecological impact because there are no obvious ecological features e.g. water, trees etc. This is highly subjective and does not mean that the land does not itself have an ecological value as being suggested by the statement. Historic Environment: This site and LP1034, 1036 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's assessment are strangely LONGER than those for linked or adjacent

sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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. Additionally there are old folks bungalows off Burned Road and the increased traffic would impact on the people living in these and no doubt at some point cause a serious if not fatal accident.

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 **HRU1018**

Site ref (if applicable):

Person ID: **1243846**

Name: **Mrs Susan Fox**

Organisation:

Agent ID:

Name:

Organisation:

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded

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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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. Burned Road has a number of old folks bungalows and the increased traffic would no doubt pose a threat to residents. They were built up there for a reason it is quiet.

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 **HRU1027**

Site ref (if applicable): **LP1037**

Person ID: **1243849**

Name: **Mr Robert Fox**

Organisation:

Agent ID:

Name:

Organisation:

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four

sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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:

Comments:

Additional Evidence Link:

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Comment ID **HRU1033**

Site ref (if applicable): **LP1037**

Person ID: **1243851**

Name: **Mr Joshua Fox**

Organisation:

Agent ID:

Name:

Organisation:

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 LP1037 - Land off Burned Road, Shelf Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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. Additionally more traffic up Burned Road would be a danger to the residents living in the old people's bungalows which were built here as it was a quiet and less dangerous place to live.

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

Duty to Co-operate Reason:

Suggested Modifications:

PLEASE REMOVE FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU1081**

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 LP1037 - Land off Burned Road, Shelf Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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 PLA

Comments:

Additional Evidence Link:

Comment ID **HRU1095**

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 LP1037 - Land off Burned Road, Shelf Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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:

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Comment ID **HRU1098**

Site ref (if applicable): **LP1037**

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 LP1037 - Land off Burned Road, Shelf Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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 **HRU1158**

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the

majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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:

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Comment ID **HRU1177**

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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:

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Comment ID **HRU1183**

Site ref (if applicable): **LP1037**

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?: **Yes**

Sound Reason:

These are my comments for site LP1037 - Land off Burned Road, Shelf Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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:

Comments:

Additional Evidence Link:

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Comment ID **HRU1206**

Site ref (if applicable): **lp1037**

Person ID: **1243924**

Name: **Mr Wesley Mellor**

Organisation:

Agent ID:

Name:

Organisation:

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 LP1037 - Land off Burned Road, Shelf Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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 **HRU1218**

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment

and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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 **HRU1222**

Site ref (if applicable): **LP1037**

Person ID: **1243923**

Name: **Mrs Lauren Mellor**

Organisation:

Agent ID:

Name:

Organisation:

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic

lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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.

Do you consider that the plan 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 **HRU1264**

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 LP1037 - Land off Burned Road, Shelf Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent.

Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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 **HRU1279**

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 LP1037 - Land off Burned Road, Shelf Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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 **HRU129**

Site ref (if applicable): **LP1037**

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:

Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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:

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Comment ID **HRU1336**

Site ref (if applicable): **LP1037**

Person ID: **1125260**

Name: **Mr Adam Redman**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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:

Comments:

Additional Evidence Link:

Comment ID **HRU1339**

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:

These are my comments for site LP1037 - Land off Burned Road, Shelf Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps.

Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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:

Comments:

Additional Evidence Link:

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Comment ID **HRU1353**

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 LP1037 - Land off Burned Road, Shelf Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section

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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:

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Comment ID **HRU1359**

Site ref (if applicable): **LP1037**

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf

and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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 **HRU138**

Site ref (if applicable): **LP1037**

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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:

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Comment ID **HRU142**

Site ref (if applicable): **lp1037**

Person ID: **1121289**

Name: **Mr Tony Hubbert**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1453**

Site ref (if applicable): **LP1037**

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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 **HRU1517**

Site ref (if applicable): **LP1037**

Person ID: **368488**

Name: **Mr & Mrs E Archbold**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU155**

Site ref (if applicable): **Lp1037**

Person ID: **1181934**

Name: **Mrs Debra Moxon**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which

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Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road.

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 31 and 34 mins, more than 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:

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Comment ID **HRU1574**

Site ref (if applicable): **LP1037**

Person ID: **1244128**

Name: **mrs Alison 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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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.

Do you consider that the plan 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 **HRU1609**

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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:

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Comment ID **HRU1618**

Site ref (if applicable): **LP1037**

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:

Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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 **HRU164**

Site ref (if applicable): **LP1037**

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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 **HRU1642**

Site ref (if applicable):

Person ID: **1244161**

Name: **Mr Chris Armitage**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1037 - Land off Burned Road, Shelf Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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 **HRU1647**

Site ref (if applicable): **LP1037**

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, development on these linked sites they will create coalescence between Shelf and Bradford. This site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Sustainability: We disagree with several of the 'positive' outcomes, most notably access to

employment The SA for this site records 1 negative outcome and 11 uncertain outcomes out of a possible 17 and yet is still put forward as positive overall . 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: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. The Burned Road arm of the junction is sub-standard and not wide enough to take traffic entering and leaving at the same time, this would create dangerous situations for traffic using the A6036 through route. Traffic lights at this junction would be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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.

Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road.

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 31 and 34 mins, more than twice the time shown on the assessment. Worryingly, these incorrect accessibility assessments have been used to support positive outcomes in the Sustainability Assessment so they have a double impact.

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:

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Comment ID **HRU171**

Site ref (if applicable): **LP1037**

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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:

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Comment ID **HRU1720**

Site ref (if applicable): **LP1037**

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 site is unnecessary for the achievement of the Council's housing requirement. Further concentration on brownfield/under-utilised sites, 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:

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Comment ID **HRU1732**

Site ref (if applicable): **LP1037**

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 LP1037 - Land off Burned Road, Shelf Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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:

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Comment ID **HRU1758**

Site ref (if applicable): **LP1037**

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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 land should remain green belt

Comments:

Additional Evidence Link:

Comment ID **HRU184**

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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

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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:

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Comment ID **HRU200**

Site ref (if applicable): **LP1037**

Person ID: **1118015**

Name: **Mr Michael Halliday**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1037 - Land off Burned Road, Shelf Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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,

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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 **HRU206**

Site ref (if applicable): **LP1037**

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 Natual 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:

These are my comments for site LP1037 - Land off Burned Road, Shelf Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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 **HRU215**

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:

These are my comments for site LP1037 - Land off Burned Road, Shelf Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. Accessibility: I disagree with some of the journey times shown in the council's site

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

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU222**

Site ref (if applicable): **LP1037**

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 LP1037 - Land off Burned Road, Shelf Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded junction. The local

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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:

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Comment ID **HRU230**

Site ref (if applicable): **LP1037**

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?:

Sound Reason:

These are my comments for site LP1037 - Land off Burned Road, Shelf Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is

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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:

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Comment ID **HRU240**

Site ref (if applicable): **1037**

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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:

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Comment ID **HRU251**

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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.

Do you consider that the plan 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

**HRU252**

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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.

Do you consider that the plan 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 **HRU256**

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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

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

Duty to Co-operate Reason:

Suggested Modifications:

I propose that the land remain as Green Belt.

Comments:

Additional Evidence Link:

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Comment ID **HRU257**

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal

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

Duty to Co-operate Reason:

Suggested Modifications:

I propose that the land remain as Green Belt.

Comments:

Additional Evidence Link:

Comment ID **HRU274**

Site ref (if applicable): **LP1037**

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via

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

Duty to Co-operate Reason:

Suggested Modifications:

I propose that the land remain as Green Belt.

Comments:

Additional Evidence Link:

Comment ID **HRU282**

Site ref (if applicable): **LP1037**

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 LP1037 - Land off Burned Road, Shelf Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area,

and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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 **HRU293**

Site ref (if applicable): **LP1037**

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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:

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Comment ID **HRU303**

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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 **HRU331**

Site ref (if applicable): **LP1037**

Person ID: **1242393**

Name: **Mr Simon Brannan**

Organisation:

Agent ID:

Name:

Organisation:

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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

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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 **HRU337**

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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

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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 **HRU347**

Site ref (if applicable): **LP1037**

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for 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 **HRU352**

Site ref (if applicable):

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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.

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

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the local plan and remain as greenbelt.

Comments:

Additional Evidence Link:

Comment ID **HRU358**

Site ref (if applicable): **LP1037**

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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.

Do you consider that the plan 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 **HRU383**

Site ref (if applicable): **LP1037**

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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 **HRU392**

Site ref (if applicable): **LP1037**

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded junction. Access can be easily blocked within Burned Road by refuge trucks and ambulances as local residents have already encountered within the area on numerous occasions. Highways estimations for a new development in Green Lane assessed 30 additional vehicles for 30 new houses, the actual amount is 3 times that and the small narrow lanes are continually blocked. Traffic assessment need to make a very detailed research before committing any new development in this area as a couple of new traffic lights will not be sufficient to avert traffic 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety 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 **HRU401**

Site ref (if applicable): **LP1037**

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via

narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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 **HRU410**

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf

and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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 **HRU415**

Site ref (if applicable): **LP1037**

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:

These are my comments for site LP1037 - Land off Burned Road, Shelf Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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:

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Comment ID **HRU435**

Site ref (if applicable): **LP1037**

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 LP1037 - Land off Burned Road, Shelf Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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:

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Comment ID **HRU440**

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 LP1037 - Land off Burned Road, Shelf Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. Accessibility: I disagree with some of the journey times shown in the council's site

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

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU442**

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 LP1037 - Land off Burned Road, Shelf Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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 **HRU485**

Site ref (if applicable): **LP1037**

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 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:

Comments:

Additional Evidence Link:

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Comment ID **HRU495**

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU51**

Site ref (if applicable): **LP1037**

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 LP1037 - Land off Burned Road, Shelf Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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.

Do you consider that the plan 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 **HRU519**

Site ref (if applicable):

Person ID: **1092926**

Name: **Miss Christine Firth**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1037 - Land off Burned Road, Shelf Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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 **HRU541**

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site 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 **HRU566**

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing

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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 PLANv

Comments:

Additional Evidence Link:

Comment ID **HRU594**

Site ref (if applicable): **LP1037**

Person ID: **717396**

Name: **Mrs Hoare**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by

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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 **HRU6**

Site ref (if applicable): **LP1037**

Person ID: **1238494**

Name: **Miss S Patchett**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

The access to this site from Burned Road and Shelf Moor Road on to the main Bradford to Halifax Road, is totally impractical. Burned Road at its junction with the A6036 is only wide enough for one vehicle and the queues on the main road are sometimes backed up to the roundabout at the Brighthouse and Denholmegate Road at busy times because of the current number of pedestrian crossings and sheer volume of traffic. The road infrastructure in this area needs more than traffic lights at the junctions to sort out the congestion that another 31 houses would create, never mind the adjacent proposed sites It is greenfield land and yet another site removed with no consideration of the damage to 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:

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Comment ID **HRU620**

Site ref (if applicable): **LP1037**

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 LP1037 - Land off Burned Road, Shelf Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf

Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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 **HRU638**

Site ref (if applicable): **LP1037**

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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by

encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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 **HRU64**

Site ref (if applicable): **LP1037**

Person ID: **1241325**

Name: **Mrs Kay Hartley**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

I live on the boundary of this proposed site and at the time of our purchase over 20yrs ago the property required a coal board report due to historic mining works. This confirmed that seams and shafts are in the area. In your plan these should appear in your constraints and reports section. Failure to do so could result in subsidence and in the worst case scenario collapse resulting in damage to any new and existing buildings. May I request that the counsel looks into this and obtains reports and surveys relevant to this area Thankyou

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 **HRU665**

Site ref (if applicable):

Person ID: **1243083**

Name: **Mrs Gillian Marks**

Organisation:

Agent ID:

Name:

Organisation:

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 LP1037 - Land off Burned Road, Shelf Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to

manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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 **HRU670**

Site ref (if applicable): **1037**

Person ID: **1121443**

Name: **Mrs Christine Moussavi**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1037 - Land off Burned Road, Shelf Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging 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 **HRU684**

Site ref (if applicable): **LP1037**

Person ID: **1122554**

Name: **Mr Hadi Moussavi**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1037 - Land off Burned Road, Shelf Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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 **HRU70**

Site ref (if applicable): **LP1037**

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:

Greenbelt: This site together with adjacent LP1034, LP1035 and LP1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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:

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Comment ID **HRU71**

Site ref (if applicable): **LP1037**

Person ID: **1094032**

Name: **Mrs Sue Chadwick**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1037 - Land off Burned Road, Shelf Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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:

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Comment ID **HRU741**

Site ref (if applicable): **LP1037**

Person ID: **514242**

Name: **Mrs Barbara Tempest**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1037 - Land off Burned Road, Shelf Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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 **HRU84**

Site ref (if applicable): **LP1037**

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

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

The access to this site from Burned Road and Shelf Moor Road on to the main Bradford to Halifax Road, is totally impractical. Burned Road at its junction with the A6036 is only wide enough for one vehicle and the queues on the main road are sometimes backed up to the roundabout at the Brighouse and Denholme Gate Road at busy times because of the current number of pedestrian crossings and sheer volume of traffic. The road infrastructure in this area needs more than traffic lights at the junctions to sort out the congestion that another 31 houses would create, never mind the adjacent proposed sites. It is greenfield land and yet another site removed with no consideration of the damage to the environment.

Do you consider that the plan 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 **HRU856**

Site ref (if applicable):

Person ID: **1241010**

Name: **Mr Carl Pope**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1037 - Land off Burned Road, Shelf Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. Accessibility: I disagree with some of the journey times shown in the council's site

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

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU88**

Site ref (if applicable): **LP1037**

Person ID: **1092924**

Name: **Mrs Lisa 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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU888**

Site ref (if applicable):

Person ID: **1122593**

Name: **Ms Janet Griffiths**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1037 - Land off Burned Road, Shelf Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is

poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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 **HRU908**

Site ref (if applicable):

Person ID: **1181809**

Name: **Mr Paul Stables**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1037 - Land off Burned Road, Shelf Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent.

Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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.

Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site.

Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road.

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 31 and 34 mins, more than 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:

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Comment ID **HRU98**

Site ref (if applicable): **LP1037**

Person ID: **1241527** Name: **Mr Jonathan 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: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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. In addition to the above, I feel I have to question the motives behind the decisions to primarily use Greenbelt for the development of the new housing developments. If the area is indeed in desperate need of the housing (which I also question considering the apparently slow turnover of current properties up for sale in Shelf & Northowram) I would have thought the redevelopment of unused mills & other non-greenbelt plots would take precedence.

From what I have seen of the "affordable housing" built in the area so far, these are large dwellings with small gardens, busy access roads of a high cost only masked to be of better value by subsidized government schemes. If the reasoning for building in the first place was legitimate, I would have thought redevelopment of non-greenbelt areas into apartments with a smaller footprint would be the option that was proposed. The infrastructure in the area is already under huge strain, many existing roads are untreated with potholes, dense traffic, double parking & unable to sustain the volumes of traffic we currently have. I have seen nothing in the plans that has alleviated my concerns that measures will be successfully in place to support both existing and new inhabitants to the area. Irreversibly destroying the landscape & habitat for nature in the area is something I strongly disagree with for the weak evidence provided in supporting this plan.

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

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU987**

Site ref (if applicable): **LP1037**

Person ID: **1243818**

Name: **Miss Kate Thwaites**

Organisation:

Agent ID:

Name:

Organisation:

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 LP1037 - Land off Burned Road, Shelf Greenbelt: This site together with adjacent LP1034, 1035 and 1036 maintains a distinct gap between Shelf and the Bradford built-up area, and this site fulfils at least two of the purposes of Greenbelt established by NPPF: 'to check the unrestricted sprawl of large built-up areas', and 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. The Council's own assessment of these four sites is inconsistent. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1036 to which it is linked. Access to LP1037 can only be onto Burned Road at a dangerous, narrow, winding section which is poorly lit as befits a quiet rural lane. Burned road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this site interacting with pedestrians. Widening of the road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 (most likely route) is via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed to

manage traffic from other proposed allocations through this already overloaded 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. Environment: There are two old Coal Pits on this site recorded on Coal Authority records. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic environment: This site and LP1034-1036 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen the road. 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 31 and 34 mins, more than 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:

## **Main Issues and Council Response**

### **Legal Compliance**

Main Issues:

1. No evidence all other reasonable options have been considered prior to amendments to Green Belt, including considering all brownfield sites.

Council's Response:

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

### **Test of Soundness**

Main Issues:

1. Site access is unsuitable. Site should be considered alongside other sites in the locality.

2. Inadequate local road network, specifically capacity, congestion, road safety and cumulative impact. Lack of current and future traffic volumes preventing an informed understanding of future problems.
3. Loss of Green Belt. Green Belt Assessment is incorrect.
4. Minerals - Coal Authority records show an old coal pit on the site. Site is within a 'Development High Risk' area. Full geological survey should be undertaken prior to allocation.
5. Heritage - Boundary dry stone walls have been recommended for retention by the Conservation (Heritage) section. However, they will be destroyed by development in widening road and creating site access.
6. Accessibility - Journey times are significantly underestimated.
7. Cumulative impact with other sites in the area.
8. Focus should be on regeneration of brownfield sites in town centres. More efficient use should be made of these sites.

#### Council's Response:

1. Highways DM consider adequate access can be achieved. The site can be accessed from Burned Road, which could be widened and provided with footways and adequate junctions using land from this site and adjacent sites.
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. It has been noted by Highways DM that as there are a number of preferred sites in this locality, mitigation at the Shelf Moor Road and Burned Road junctions with the A6036 would be needed to accommodate the additional trips; this may require traffic signals. Impacts and mitigation will be assessed through the Transport Statement. The Council considers that the evidence submitted supports and justifies the content of the Local Plan. 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. In terms of traffic volumes the information is contained in the various Technical Notes. These can be found on the Local Plan section of the Calderdale website under "Evidence Base: Transport". For example observed and modelled base traffic is included in Appendix H of the Local Model Validation Report (October 2016) Future traffic and the impact in terms of delays are contained in Technical Note 9 "Assessment of Cumulative Impact".

Any Individual applications would be required to produce a Transport Statement or Assessment detailing the traffic impact.

For larger sites more detailed individual junction models would be required and any mitigating measures identified

3. 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. 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.

5. The retention of the boundary walls is included as a Site Specific Consideration for this site.

6. Accessibility modelling has been undertaken by West Yorkshire Combined Authority which takes into account the most recent integrated transport networks and public transport timetables. The methodology used for assessing accessibility is within the appendices of the Site Assessment Methodology document.

7. The 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.

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 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.

## **Duty to Co-operate**

Main Issues:

Council's Response:

**Suggested Modifications**

1. Site should be removed from the Local Plan.

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 **HRU1007**

Site ref (if applicable): **LP1044**

Person ID: **1123373**

Name: **Mr Derek Armstead**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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. End of suggested comments

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 **HRU1034**

Site ref (if applicable):

Person ID: **1243850**

Name: **Miss Nicole Jones**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

The Council has not sufficiently considered the impact of the loss of this land on the local community and wildlife habitats. I disagree with the assessment of it only serving 3 of the 5 purposes of greenbelt and would argue that it serves a 4th therefore making it 'most sensitive'. In regard to Highways this additional traffic that the development of this site will bring will further contribute to the traffic congestion at Hipperholme and the Air Quality problem. The local plan sees an additional proposed 959 homes without further supply of education and medical facilities. The impact of this has not been adequately considered. Furthermore with the recent flooding it is important to preserve the natural drainage and feel that Calderdale Council should look at regeneration of brownfield sites and boarded up empty homes. The Ridings and old Moorsideschools are empty and not maintained. Sites such as these should be considered prior to cutting into the 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:

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Comment ID **HRU105**

Site ref (if applicable): **LP1044**

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:

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Comment ID **HRU1072**

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 LP1044 - Hud Hill Farm 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 **HRU1087**

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 LP1044 - Hud Hill Farm 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 **HRU1101**

Site ref (if applicable): **LP1044**

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 LP1044 - Hud Hill Farm 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

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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 **HRU1127**

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 LP1044 - Hud Hill Farm 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

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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 **HRU1131**

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 LP1044 - Hud Hill Farm 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

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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 **HRU1152**

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: 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 **HRU1172**

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: 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:

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Comment ID **HRU1181**

Site ref (if applicable): **LP1044**

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:

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 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:

Comments:

Additional Evidence Link:

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Comment ID **HRU1212**

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: 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 **HRU1227**

Site ref (if applicable): **L01044**

Person ID: **1130391**

Name: **Miss Alison Grogan**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The 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 **HRU123**

Site ref (if applicable): **LP1044**

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:

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 **HRU1230**

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: 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:

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Comment ID **HRU1241**

Site ref (if applicable): **LP044**

Person ID: **1130670**

Name: **Mrs Lilian Grogan**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The 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 **HRU1255**

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 LP1044 - Hud Hill Farm 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 **HRU1257**

Site ref (if applicable): **LP1044**

Person ID: **1102440**

Name: **Mrs Ann Harris**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The 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 **HRU1259**

Site ref (if applicable): **LP1044**

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 LP1044 - Hud Hill Farm 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:

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Comment ID **HRU1273**

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 LP1044 - Hud Hill Farm 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:

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Comment ID **HRU133**

Site ref (if applicable): **LP1044**

Person ID: **1124475**

Name: **Mr Peter Horne**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The 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:

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Comment ID **HRU1330**

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: 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:

Comments:

Additional Evidence Link:

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Comment ID **HRU1344**

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 LP1044 - Hud Hill Farm 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:

Comments:

Additional Evidence Link:

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Comment ID **HRU1455**

Site ref (if applicable): **LP1044**

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: 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:

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Comment ID **HRU1468**

Site ref (if applicable):

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:

Greenbelt - this site provides an important buffer between Northowram and Shelf. It prevents the area becoming one big development. Highways - due to the location, access to this site would be difficult. The number of extra cars using either the narrow, already congested roads in Northowram and the roundabout at Shelf would increase significantly Environmental - Hud Hill Farm is an historic building and should be recognized as such. Ecology - This area supports a diverse population of animals and amphibians and should not be lost. Accessibility - Traffic is already slow moving at peak times and further development would only make this worse. I propose that this land should remain Green Belt as it's loss would impact the already over stretched infrastructure and alter the nature of the community.

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

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the plan

Comments:

Additional Evidence Link:

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Comment ID **HRU1531**

Site ref (if applicable): **LP1044**

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: 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 **HRU1537**

Site ref (if applicable): **LP1044**

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: 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:

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Comment ID **HRU159**

Site ref (if applicable): **LP1044**

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: 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 **HRU1603**

Site ref (if applicable): **LP1044**

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:

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 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:

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Comment ID **HRU1615**

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: 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 **HRU1620**

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:

These are my comments for site LP1044 - Hud Hill Farm 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:

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Comment ID **HRU1649**

Site ref (if applicable): **LP1044**

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 Council's own assessment states that this site fulfils four of the five purposes of Greenbelt and we agree with this. It provides an important buffer between the settlements of Northowram and Shelf and prevents ribbon development along the A644 towards Queensbury. Sustainability: The SA for this site records 1 negative outcome and 11 uncertain outcomes out of a possible 17 and yet is still put forward as positive overall. 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: 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 decision which we support. 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 and importantly increase traffic through the A58/A644 crossroads at Hipperholme, something the Council is trying to avoid at all costs. 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. 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: We 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. Worryingly, these incorrect accessibility assessments have been used to support positive outcomes in the Sustainability Assessment so they have a double impact. 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:

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Comment ID **HRU166**

Site ref (if applicable): **LP1044**

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: 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 **HRU1680**

Site ref (if applicable): **LP1044**

Person ID: **1123300**

Name: **Miss Melissa Hall**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The 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:

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Comment ID **HRU1711**

Site ref (if applicable): **LP1044**

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 LP1044 - Hud Hill Farm 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 **HRU1724**

Site ref (if applicable): **LP1044**

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 site is unnecessary for the achievement of the Council's housing requirement. Further concentration on brownfield/under-utilised sites, 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 **HRU174**

Site ref (if applicable): **LP1044**

Person ID: **1182651**

Name: **Mrs Sandra Whitehead**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

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. Northowram And Shelf have already lost so many green spaces through heady development in these areas and I believe it to be detrimental to the area to continue with further development. 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. There are badgers, foxes, hedgehogs etc. and numerous species of birds of which have already declined in numbers due to overdevelopment of Northowram and Shelf. 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. I know for a fact that it took me 15 minutes at 8.30am the other morning just to travel from our driveway, near Springhead Manor, the short distance down the Hough to Stump Cross where I could join the A58 into Halifax so add on the time crawling up Godley to the other side of town makes the journey times shown in the site assessment not attainable. Additional Comments: we have already experienced an increase in flooding of certain roads in heavy rain,

Hall Lane in Northowram is frequently flooded in parts along with the Hough in Northowram resembling a river with just small amounts of rain, all contributing to more dangerous driving conditions. The proposed development of this site would only add to these conditions as rain will run down from the development onto the roads in Northowram instead of being allowed to soak naturally into the ground. 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 these comments and fully 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 this proposed development should be taken off the proposals.

Comments:

Additional Evidence Link:

Comment ID **HRU1744**

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:

Comments:

Additional Evidence Link:

Comment ID **HRU1762**

Site ref (if applicable): **LP1044**

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: 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:

should remain green belt

Comments:

Additional Evidence Link:

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Comment ID **HRU1803**

Site ref (if applicable):

Person ID: **1156792** Name: **Mr S Pearce** Organisation:

Agent ID: **1124320** Name: **Mr Ian Swain** 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/5618984>

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Comment ID **HRU186** 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: 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:

Comments:

Additional Evidence Link:

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Comment ID **HRU191**

Site ref (if applicable): **LP1044**

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. 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 **HRU195**

Site ref (if applicable): **LP1044**

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. 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?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU210**

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:

These are my comments for site LP1044 - Hud Hill Farm 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 **HRU223**

Site ref (if applicable): **LP1044**

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 LP1044 - Hud Hill Farm 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?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU2265**

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 **HRU2293**

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 **HRU2306**

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:

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 **HRU231**

Site ref (if applicable): **LP1044**

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 LP1044 - Hud Hill Farm 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?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU234**

Site ref (if applicable): **LP1044**

Person ID: **1116568**

Name: **Mrs Pauline Stead**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The 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 **HRU235**

Site ref (if applicable): **LP1044**

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: 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:

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Comment ID **HRU246**

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.

Do you consider that the plan 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 **HRU259**

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: The boundaries of LP1036 have been significantly altered since the Local Plan Draft version 2017 but the Green Belt assessment does not appear to have been updated. This makes it very difficult to make an informed comment on its Green Belt status. The site is linked to the existing urban area only by its short boundary to the east. Development would result in a narrow strip of housing surrounded by Green Belt on two sides and a sports field on the third. The existing green belt assessment is highly subjective and lacking in competence. Highways: This site needs to be assessed alongside adjacent sites LP1034, LP1035 and LP1037 to which it is linked. Access to LP1036 will have to be through LP1034/1035 onto Soaper Lane which lacks a footway on the south side. Access onto the A6036 via Burned Road (most likely route) uses a dangerous, narrow, winding country lane which is poorly lit as befits a quiet rural lane. Burned Road does not have footways for the majority of its length so is not suitable for the larger traffic volumes generated by this and other linked sites interacting with pedestrians. Widening of Burned Road would require third party land and demolition of dry-stone walls which the Conservation Section has recommended to keep. Access onto the A6036 will be via narrow, overloaded junctions at Burned Road and Shelf Moor Road. Management of traffic at the Burned Road junction by traffic lights is a ludicrous suggestion. They will be within tens of metres of the existing pedestrian lights at Shelf Pharmacy and about 100 metres away from Shelf Moor road where more traffic lights are proposed through this already overloaded junction, to manage traffic from other proposed allocations. 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. Environment: There is an old Coal Pit and mine tailings recorded on Coal Authority records, this is visible on the ground. The site is also in a 'Development High Risk' area as shown on Coal Authority maps. Old mine workings are becoming increasingly evident from the number of 'sink holes' developing. This is a great risk to health and safety and also a financial risk for future residents. A full geotechnical survey should be carried out before allocating this site. Historic Environment: This site and LP1034, 1035 and 1037 are bounded by dry stone walls which are a characteristic feature of the local environment and Conservation (Heritage) Section has recommended they be retained. These walls would be destroyed by development in order to widen roads and create access points. Accessibility: The journey times specified in the Council's

assessment are strangely LONGER than those for linked or adjacent sites that are as close to a bus stop e.g. LP1037. This just shows the complete lack of knowledge or consistency in producing these assessments and also that they cannot be relied upon as a measure of sustainability. Additional Comments: This site is one of 12 proposed new housing sites in Northowram and Shelf Ward, 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 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:

I propose that the land remain as Green Belt.

Comments:

Additional Evidence Link:

Comment ID **HRU267**

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: 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.

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.

Comments:

Additional Evidence Link:

Comment ID **HRU268**

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: 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

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

Duty to Co-operate Reason:

Suggested Modifications:

I propose that the land remain as Green Belt.

Comments:

Additional Evidence Link:

Comment ID **HRU269**

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.

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.

Comments:

Additional Evidence Link:

Comment ID **HRU270**

Site ref (if applicable): **LP1044**

Person ID: **1131102**

Name: **Mr Phil Taylor**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The 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.

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.

Comments:

Additional Evidence Link:

Comment ID **HRU277**

Site ref (if applicable): **LP1044**

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 LP1044 - Hud Hill Farm 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:

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Comment ID **HRU295**

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: 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 **HRU302**

Site ref (if applicable): **LP1044**

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: 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 **HRU306**

Site ref (if applicable): **LP1044**

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: 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?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU324**

Site ref (if applicable): **LP1044**

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: 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 **HRU332**

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: 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

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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 **HRU361**

Site ref (if applicable): **LP1044**

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: 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 plan should be removed from the local plan.

Comments:

Additional Evidence Link:

Comment ID **HRU364**

Site ref (if applicable): **LP1044**

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: 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:

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Comment ID **HRU371**

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 LP1044 - Hud Hill Farm 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 **HRU374**

Site ref (if applicable): **LP1044**

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:

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

Duty to Co-operate Reason:

These are my comments for site LP1044 - Hud Hill Farm 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.

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU378**

Site ref (if applicable): **LP1044**

Person ID: **1183442**

Name: **Mr Daniel Cook**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The 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 **HRU393**

Site ref (if applicable): **LP1044**

Person ID: **975323**

Name: **Mr Charles Shaw**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The 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 develop-able 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 **HRU402**

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: 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 **HRU404**

Site ref (if applicable): **LP1044**

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: 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:

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Comment ID **HRU412**

Site ref (if applicable): **LP1044**

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 LP1044 - Hud Hill Farm 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:

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Comment ID **HRU417**

Site ref (if applicable):

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: 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:

Take off the Local Plan

Comments:

Additional Evidence Link:

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Comment ID **HRU423**

Site ref (if applicable): **LP1044**

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 LP1044 - Hud Hill Farm 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:

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Comment ID **HRU436**

Site ref (if applicable): **LP1044**

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:

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:

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Comment ID **HRU447**

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 LP1044 - Hud Hill Farm 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:

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Comment ID **HRU46**

Site ref (if applicable): **LP1044**

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 LP1044 - Hud Hill Farm 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.

Do you consider that the plan 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 **HRU465**

Site ref (if applicable): **LP1044**

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: 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:

I believe this application should be removed from the Local Plan

Comments:

Additional Evidence Link:

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Comment ID **HRU486**

Site ref (if applicable): **LP1044**

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: 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:

I would propose that this site remains part of the green belt.

Comments:

Additional Evidence Link:

Comment ID **HRU491**

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: 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

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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:

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Comment ID **HRU536**

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: 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

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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 **HRU544**

Site ref (if applicable): **LP1044**

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: 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 **HRU561**

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: 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

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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 **HRU57**

Site ref (if applicable): **LP1044**

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:

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

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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 **HRU571**

Site ref (if applicable): **LP1044**

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: 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

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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 **HRU578**

Site ref (if applicable): **LP1044**

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 LP1044 - Hud Hill Farm 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 **HRU59**

Site ref (if applicable): **LP1044**

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 Natual 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: 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:

Comments:

Additional Evidence Link:

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Comment ID **HRU596**

Site ref (if applicable): **LP1044**

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 LP1044 - Hud Hill Farm 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:

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Comment ID **HRU613**

Site ref (if applicable): **LP1044**

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 LP1044 - Hud Hill Farm 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 **HRU633**

Site ref (if applicable): **LP1044**

Person ID: **1093075**

Name: **Mrs Alison Cooper**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The 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 **HRU642**

Site ref (if applicable): **LP1044**

Person ID: **1121443**

Name: **Mrs Christine Moussavi**

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:

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 **HRU659**

Site ref (if applicable):

Person ID: **1243083**

Name: **Mrs Gillian Marks**

Organisation:

Agent ID:

Name:

Organisation:

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 LP1044 - Hud Hill Farm 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 **HRU676**

Site ref (if applicable): **PL1044**

Person ID: **1122554**

Name: **Mr Hadi Moussavi**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1044 - Hud Hill Farm 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

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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 **HRU695**

Site ref (if applicable):

Person ID: **1182105**

Name: **Mr Kearn Chappell**

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 **HRU698**

Site ref (if applicable):

Person ID: **1182105**

Name: **Mr Kearn Chappell**

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 **HRU742**

Site ref (if applicable): **LP1044**

Person ID: **514242**

Name: **Mrs Barbara Tempest**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1044 - Hud Hill Farm 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

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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 **HRU76**

Site ref (if applicable): **LP1044**

Person ID: **1094032**

Name: **Mrs Sue Chadwick**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1044 - Hud Hill Farm 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

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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 **HRU793**

Site ref (if applicable): **LP1044**

Person ID: **1128086**

Name: **Mrs Leanne Holdsworth**

Organisation:

Agent ID:

Name:

Organisation:

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 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 **HRU80**

Site ref (if applicable): **LP1044**

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

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

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

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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 **HRU858**

Site ref (if applicable):

Person ID: **1241010**

Name: **Mr Carl Pope**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1044 - Hud Hill Farm 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

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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 **HRU889**

Site ref (if applicable):

Person ID: **1122593**

Name: **Ms Janet Griffiths**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1044 - Hud Hill Farm 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

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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 **HRU90**

Site ref (if applicable): **LP1044**

Person ID: **1092924**

Name: **Mrs Lisa 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: 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

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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

Site ref (if applicable):

Person ID: **1181809**

Name: **Mr Paul Stables**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

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

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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 **HRU93**

Site ref (if applicable): **LP1044**

Person ID: **1241527**

Name: **Mr Jonathan Shaw**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: The 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. In addition to the above, I feel I have to question the motives behind the decisions to primarily use Greenbelt for the development of the new housing developments If the area is indeed in desperate need of the housing (which I also question

considering the apparently slow turnover of current properties up for sale in Shelf & Northowram) I would have thought the redevelopment of unused mills & other non-greenbelt plots would take precedence. From what I have seen of the "affordable housing" built in the area so far, these are large dwellings with small gardens, busy access roads of a high cost only masked to be of better value by subsidized government schemes. If the reasoning for building in the first place was legitimate, I would have thought redevelopment of non-greenbelt areas into apartments with a smaller footprint would be the option that was proposed. The infrastructure in the area is already under huge strain, many existing roads are untreated with potholes, dense traffic, double parking & unable to sustain the volumes of traffic we currently have. I have seen nothing in the plans that has alleviated my concerns that measures will be successfully in place to support both existing and new inhabitants to the area. Irreversibly destroying the landscape & habitat for nature in the area is something I strongly disagree with for the weak evidence provided in supporting this plan.

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

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

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Comment ID **HRU956**

Site ref (if applicable): **1044**

Person ID: **1243676**

Name: **Mr Elaine Caffrey**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Not qualified to comment

Do you consider the plan to be Sound?:

Sound Reason:

This site is currently a farm house and cottage the access to which is Score Hill. Score Hill is about wide enough for one car but is a two way road. No other entrance is, to my knowledge, available. This site meets green belt criteria and it is surprising therefore it is being considered for development. The current house is a standalone complex in a field surrounded by other fields with only one other isolated property bordering the A644.

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 **HRU963**

Site ref (if applicable): **LP1044**

Person ID: **1128088**

Name: **Mr Adrian Holdsworth**

Organisation:

Agent ID:

Name:

Organisation:

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:

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Comment ID **HRU979**

Site ref (if applicable): **LP1044**

Person ID: **1243818**

Name: **Miss Kate Thwaites**

Organisation:

Agent ID:

Name:

Organisation:

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 LP1044 - Hud Hill Farm 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:

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## **Main Issues and Council Response**

### **Legal Compliance**

Main Issues:

1. No evidence all other reasonable options have been considered prior to amendments to Green Belt, including considering all brownfield sites.

Council's Response:

1. This issue is dealt with under 'Soundness'.

### **Test of Soundness**

Main Issues:

1. Green Belt - the site performs 4 out of 5 Green Belt purposes. Objection to loss of Green Belt
2. Site access is not achievable without adjacent site LP1045 which has been filtered.
3. Local road network, specifically congestion and capacity. Lack of current and future traffic volumes preventing an informed understanding of future problems. Supporting information e.g. Travel Assessment, should be provided prior to allocation.
4. The developable area shows historic Hud Hill farm being washed over with development. This is an historic building and should be recognised as such.
5. Ecology - impact on ecology, including amphibians. An Ecological Survey should be undertaken prior to allocation.
6. Accessibility - Journey times are significantly underestimated.
7. Cumulative impact with other sites in the area.
8. Focus should be on regeneration of brownfield sites in town centres. More efficient use should be made of these sites.
9. Infrastructure - Lack of/pressure on existing amenities, services and facilities in the local area, e.g. schools, shops, doctors.
10. Impact on air quality.

## 11. Loss of Open Space

12. 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. 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 comment provided by Highways DM that in providing an appropriate access, both frontages (LP1044 and LP1045) may be required, was made prior to LP1045 be filtered. Highways DM have not objected to LP1044 being allocated without LP1045. Appropriate visibility will need to be demonstrated, and a proposal will need to be submitted with a Transport Assessment and Travel Plan.

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.

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.

In terms of traffic volumes the information is contained in the various Technical Notes. These can be found on the Local Plan section of the Calderdale website under "Evidence Base: Transport"

For example observed and modelled base traffic is included in Appendix H of the Local Model Validation Report (October 2016)

Future traffic and the impact in terms of delays are contained in Technical Note 9 "Assessment of Cumulative Impact".

Any Individual applications would be required to produce a Transport Statement or Assessment detailing the traffic impact.

For larger sites more detailed individual junction models would be required and any mitigating measures

identified

4. There are various buildings within the site, including a dwelling owned by the landowner of the site who has confirmed that the site is available. The owner's current intention is to retain the existing buildings and, subject to planning approval, develop some of the redundant buildings to provide additional dwelling spaces. Hud Hill Farm is not a listed building.

5. The Site Assessment acknowledges that this site contains hedgerows, a pond and grassland. It has also been highlighted that there is an area of Lowland Meadow (UK BAP priority habitat), which is outside the developable area that will require suitable management. However, it is considered development is likely to be possible subject to an Ecological Impact Assessment, which should be informed by bat and amphibian surveys. It is also recommended that the existing hedgerows are maintained and enhanced.

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. Accessibility modelling has been undertaken by West Yorkshire Combined Authority which takes into account the most recent integrated transport networks and public transport timetables. The methodology used for assessing accessibility is within the appendices of the Site Assessment Methodology document.

7. The 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.

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 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.

9. 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.

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.

11. The site is currently designated as Green Belt, 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 Green Belt sites performing this function within the 400m and 600m catchments. 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.

12. 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:

Council's Response:

### **Suggested Modifications**

1. The site should be removed from the Local Plan.

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

Council's Response:

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

2. 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

Site ref (if applicable): **LP1523**

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 local plan

Comments:

Additional Evidence Link:

Comment ID

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 LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU1089**

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 LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU1102**

Site ref (if applicable): **LP1523**

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:

Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of

Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: [" To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU1129**

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 LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: [" To assist in safeguarding the

countryside from encroachment"¶is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU1132**

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 LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: [-" To assist in safeguarding the countryside from encroachment"¶is illogical and lacking in objectivity and several of the negative

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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 **HRU1154**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area 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:

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Comment ID **HRU1173**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give

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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 **HRU1182**

Site ref (if applicable): **LP1523**

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 LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify

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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:

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Comment ID **HRU1213**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). The local highway network in Northowram & Shelf is already congested but no figures for current or future

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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 **HRU1231**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in

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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 **HRU1235**

Site ref (if applicable): **LP1523**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. Additional Comments: This

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

Duty to Co-operate Reason:

Suggested Modifications:

THIS SITE SHOULD BE REMOVED FROM THE LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU124**

Site ref (if applicable): **LP1523**

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:

Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU1243**

Site ref (if applicable): **LP1523**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU1258**

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 LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU1260**

Site ref (if applicable): **LP1523**

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 LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: [-" To assist in safeguarding the countryside from encroachment" is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU1274**

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 LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: [-" To assist in safeguarding the countryside from encroachment" is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU1333**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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:

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Comment ID **HRU134**

Site ref (if applicable): **LP1523**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU1347**

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 LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: [-“ To assist in safeguarding the countryside from encroachment”] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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:

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Comment ID **HRU1363**

Site ref (if applicable): **LP1523**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU1456**

Site ref (if applicable): **LP1523**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU1473**

Site ref (if applicable): **LP1523**

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:

Greenbelt - this area of green belt land currently acts as a buffer between Westercroft Hamlet and the rest of Northowram. It's development would encroach on Lumbrook. Highways - this site would intensify congestion and air pollution on an already busy road. Ecology - this field provides habitat and food for a wide variety of birds and insects. I proposed that this land remains green belt as it's loss would be a detriment to the whole area.

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

Duty to Co-operate Reason:

Suggested Modifications:

This site should be removed from the plan

Comments:

Additional Evidence Link:

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Comment ID **HRU1532**

Site ref (if applicable): **LP1523**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area 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 **HRU1538**

Site ref (if applicable): **LP1523**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give

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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 **HRU160**

Site ref (if applicable): **LP1523**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add

further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU1612**

Site ref (if applicable): **LP1523**

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:

Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU1616**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in

wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU1624**

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:

These are my comments for site LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology

survey should be carried out before allocating this site. 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 **HRU1652**

Site ref (if applicable): **LP1523**

Person ID: **1171108**

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

Organisation: **Chairperson SNLPF**

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: We agree that this site is rated 'most sensitive' but disagree with the Council's assessment that it fulfils ONLY three of the five purposes of Green Belt. The council's assessment for Purpose III: [-" To assist in safeguarding the countryside from encroachment" is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and coalescence with Westercroft. It will create ribbon development along Westercroft Lane and give an uneven development pattern leaving adjacent areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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:

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Comment ID **HRU1662**

Site ref (if applicable): **LP1523**

Person ID: **1129568**

Name: **Mrs Marilyn Brichard**

Organisation:

Agent ID: **1129163**

Name: **Mrs Marilyn Brichard**

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

Summary The Local Plan is based on out of date patterns of growth, does not respond to the Climate Emergency, fails to provide sufficient land to for both Housing and Employment particularly for small scale business, nor does it consider or provide for small scale sustainable growth which is more easily deliverable in a shorter time frame. The methodologies used for site allocations have been applied inconsistently and without adequate weighting, such that sites which share similar characteristics have brought about vastly differing conclusions often with sweeping assumptions. Calderdale should be developing its place in the Northern Powerhouse and creating and capitalising on our assets. Reacting positively to flooding issues on a long-term basis given the EA's stance on future flood defence provision whereby they propose to move away from flood protection and towards flood resilience should have much greater importance. The Plan prioritises sustainable transport links provided by private companies as the fundamental driver for growth in the borough. Clearly the Plan is unsound. The Climate Emergency The Climate Emergency means we should look towards decentralizing movement patterns, reducing the need for travel by vehicles by developing communities in such a way as to provide walkable neighbourhoods that provide all day to day facilities for living within easy walking distance. This is especially so in the rural areas to the Western side of Calderdale because of the existing constraints on travelling by road. Demands for growth of Leeds City Region (LCR) have derailed the Local Plan focus from Calderdale as a district and placed too much emphasis on development which will support the growth of the LCR at a cost to the Western side of Calderdale.

Todmorden and the upper valley towns are ideally placed to counter the need to pass through topographical constraints to reach employment in the East of the district and further commuting patterns to Bradford, Leeds and Huddersfield. The location of major housing in the Eastern side of Calderdale will drive up commuting to outside the district to the detriment of the economic growth of the area. Simply creating a plan based on commuting around Halifax and Brighouse, with the restrictive road network and poor public transport opportunities is not sustainable, The Steer Davies Gleave Report; Appraising the Approaches to Future Development 2010 suggested that transport links in Calderdale are not relevant to the consideration of growth and the spatial distribution of development. Therefore only Employment allocations with a functional need to access the motorway network should be focused around motorway access rather than housing allocations which relate more to Leeds and the other centres that are easily accessible from the M62 such that it will ultimately reduce the growth potential of the district. Smaller localised development offers a greater opportunity for sustainable growth providing allocations encompass all aspect of placemaking balancing the need for employment allocations with housing numbers. The Plan provides for virtually none of either in the West. Why is there no development around train stations in the West of the borough? Accessibility throughout the valley is clearly available and Todmorden, Hebden Bridge, Mytholmroyd and Sowerby Bridge should be considered as ideally placed local services centres able to support proportional development in sustainable locations. Growth in Employment and housing provision will strengthen these flood affected towns ensuring they remain sustainable in to the future.

**Flood Impact** The flood affected areas require specific proposals to address the problems arising from the limits on existing infrastructure and calls to make changes which will increase flood resilience through changes to land use patterns. Currently there are calls to use some brownfield land in the valley bottoms for development which is subject to serious flooding and as such will not be developed for housing and are unattractive to employment users. Rather than trying to make these sites work, it would be better to develop alternative sites even though they might be in Green Belt to provide the opportunities that are needed to keep these towns vibrant and viable. Certainly land supply is constrained by the topography but there are opportunities that have been dismissed because they fall in the Green Belt and that is considered to be politically unacceptable. The use of land around these towns for new housing also has the potential to reduce surface water flooding by the use of SuDS and instead of being considered to contribute to flooding by adding built development, it is the case that new development can be designed to reduce the outfall from land in a controlled way and reduce flooding. This has not been considered even though it is a realistic solution to remove valley bottom development and create more flood plains and replace that with new development higher on the hill using SuDS to reduce water run-off rates.

**Zero Carbon** The Zero Carbon Government target is acknowledged by Calderdale as a priority however the Plan does not reduce the need to travel for work and leaves communities without options for growth of any type thereby missing the opportunity to reduce the need for travel. As a result this Plan will actually support the increased travel demand across the borough reducing Calderdale's ability to help reduce Climate Change. The preferred locations for high levels of housing as shown in the Plan offer few opportunities to walk to work or to the shops and services. Electric vehicles will reduce air quality issues in the future but this alone will not reduce traffic congestion. Reliance on the bus services whilst they remain in private operation is not appropriate in Calderdale given the topographical constraints and historic patterns of development, especially in Rural areas. Furthermore developing patterns of -"sustainable" development based on access to bus services owned by third parties is not an adequate justification for allocating land. The impact of extra traffic has not been robustly considered and placing large numbers of housing and employment in SE Halifax and Brighouse will exasperate problems with traffic congestion, air quality, impacting on health and well-being in the bottle necks across the district. The need to travel for employment due to the spatial distribution of development proposed in the Plan is unsound. Proportional Growth Organic proportional growth has the ability to improve social, economic and environmental factors by achieving sustainable development. This is the fundamental objective of NPPF. It is not about the sustainability of travel options that really matters as that is only one aspect of the matrix of planning issues that contribute to sustainable development, matters which are encompassed in placemaking. The NPPF recognises that development in

villages is sustainable development and that the growth in villages is actively supported in policy. Para 78 specifically addresses the issue that the size of the settlement is inconsequential and that small settlements can help to achieve sustainable development with their ability to feed into larger settlements helping to support a strong rural economy. The Plan does not afford the rural areas of the borough any support at all. Green Belt Green Belt guidance in the NPPF advocates the use of strong defensible boundaries for the Green Belt, boundaries which should only be revised in exceptional circumstances. The very word exceptional signifies that they should be considered permanent and that the change of such boundaries is not a task which should be undertaken lightly nor that continual changes can be considered acceptable. The idea of permeance means just that and in order to achieve such permanence they should give room for organic growth in order for communities to react to future changes in land use. The Plan affords no flexibility in Green Belt boundaries having arbitrary lines across back gardens and through villages without strong defensible edges. Green Belt in Calderdale also includes inliers and islands in the plan which are not consistent with the five aims of the Green Belt nor do they demonstrate a thorough assessment of the changes being made and the consequence of such changes. No reference to strong identifiable features on the ground and no logical separation between land uses or physical features shows a lack of consideration for the future and without such the Plan is not of sufficient robustness to be considered fit for purpose in order to adequately protect the Green Belt from encroachment. The desire to limit the use of Green Belt land has overridden a pragmatic approach to Green Belt boundaries and this lack of flexibility means a lack of space for organic growth which drives up house prices in areas of the borough which have not seen allocations brought forward in the Local Plan. Smaller settlements are left with no opportunity for growth which sterilises them over time due to ageing populations and no room for new and young families. This results in pressure for school closures and then the steady decline of services. Reducing the sustainability of settlements is counter to NPPF which actively supports a prosperous rural economy. The concentration of facilities in larger town locations was seen as cost efficient in previous times but it now results in more travel which is contrary to the demands of Climate Change and creates an imbalance in the lives of people who spend a lot of time travelling to and from work, school and leisure because those facilities are not available locally. Placemaking The Placemaking approach to development would provide more employment opportunities closer to homes reducing the need to travel to places of employment outside of walkable distances. Shuttle services around local centres could provide transport from local homes to local places of work along with the provision of green corridor cycle routes. The Plan focuses on the traditional concept of arterial transport links to the Town Centre and a reliance on travel over long distances. Clearly it is not the case that residents in any one town or village would necessarily be able to work in the same location but providing opportunities to do so would make a huge difference to the live-work balance. Work patterns have shifted in recent years and many people now run their own businesses. Having an opportunity to rent a storage yard or lock-up would assist many independent tradespeople and small starter offices would assist those businesses that have outgrown the spare bedroom. This is the entrepreneurial tradition of this area that should be supported into the future. Relying on large businesses to come to Calderdale as was the intention of the Clifton Science and Technology Park project as it was originally conceived in the 1990's will not be successful. Calderdale will not be able to attract this level of investment in competition with Leeds and Wakefield and so it should be looking to develop sites that are suitable, for the many small businesses already located here and provide opportunities for them to grow and develop in locations which are convenient to them. Clearly a balance is needed in sustainable development which is discussed in the NPPF, the Social and Economic arms of sustainability have been unduly dismissed when considered against the Environmental arm specifically the sustainable transport aspects which the Plan is centred around. Infrastructure The Plan emphasises the need for Infrastructure and the provision of Garden Suburbs in the East is considered to be able to provide this. However, the proposed Community Infrastructure Levy is low to nil in the majority of locations proposed for housing in the Plan. This means that less income in the form of Cil will be available to the Council. More housing in the higher banded zones should be allocated to improve local infrastructure provision across the borough. Large sites in low CIL band areas contribute little to the District other than

what is necessary for their development. Furthermore, the increases in density proposed by the "sustainable option" has not been evidenced as achievable. It has simply been an administrative task designed to reduce the Green Belt land take. It is notable that in Calderdale higher density apartment schemes have not come forward in recent years and only a small number have been developed due to an oversupply of high-density developments. There are many units above town centre uses which are unoccupied and no obvious demand for such dwellings is in evidence. The proposals in the Plan are therefore unlikely to achieve the suggested densities even if they are to be considered viable commercially. In Rural areas the suggested densities are inappropriate for many locations in terms of character and landscape and so the projected number of houses is unlikely to materialise. New Housing Sites A large number of the allocation for New Housing Sites, 1274 dwellings (see Appendix 1), is on land already in the Primary Housing Area and has been so since at least 2002. This suggests that there are fundamental reasons why those sites have not been developed, especially considering the inflated house values over the last plan period due to a chronic lack of housing delivered. Realistically how can the Plan suggest they are deliverable during the next plan period when they have not been brought forward in the last 18 years? The call for sites questionnaire asks whether the sites are available and deliverable but in reality no site owner would say they are not since that would remove the sites for housing and that is the primary driver of the land value. It is clear that these sites are for the large part unrealistic elements to be counted as part of the housing supply for the next plan period. The Brownfield sites suggested as New Housing Sites would have come forward had they been viable for housing and the reliance on windfalls for the majority of the last plan period has only left the worst of the sites which are borderline unviable for housing development. Many of those sites that are in active use have greater value as employment sites and the costs associated with remediation and poor end values means that they are not viable as new housing sites. They have not been brought forward for sound reasons and housing supply statistics shows that the rate of windfall sites has fallen, which further supports the lack of viability for those sites that still remain. Employment Land Some of the employment land that is now proposed as New Housing Sites has been available for housing development since before 2012. When the NPPF was introduced in 2012 it removed Calderdale's RUDP Policy E5 which protected employment land from development (See appendix 2). These sites have not come forward in the past 8 years which again suggests that they are not viable housing sites. This adds a further 729 dwellings which are unlikely to be brought forward during the next plan period. The new employment allocations in the Plan have only allocated 14ha of new employment land as analysis shows that much of it has been allocated as employment land since before 2002/6 (See Appendix 3). The carryover of this land is unsound as the sites have been available for development as employment sites and have not been developed. There are many factors why sites such as these do not come forward for employment development such as issues affecting viability, third party land needed for development, conflict of users, ownership, inappropriate location with regards to functional need and so on. However, since the use of the sites has not materialised in the last 18 years there is no obvious significant change to suggest that they will come through in the next plan period as the Plan does not significantly impact any of these matters. According to the Council's reports, a large number of employment allocations are not viable as developer-led employment sites and so are unlikely to come forward for small scale employment uses. These could help to support local communities as well as the wider District offering potential for larger employment numbers in more concentrated locations helping to drive growth and achieve sustainable patterns of development. Mixed Use Sites Furthermore Mixed-Use allocations have been used by the Council to reduce Green Belt take by allocating out of town employment sites as suitable for mixed uses such as Top Land LP1622 in Mytholmroyd. Mixed use housing allocations are likely to give rise to conflict between user groups which place unnecessary burdens on development, reducing the attractiveness of either option and affecting viability as is evidenced by the lack of schemes brought forward in the previous plan period for mixed use sites such as the land at Mill Lane and Old Lane, Boothtown LP1216. Town centre developments can achieve acceptable mixed-use arrangements however historically in Calderdale they have produced under-utilised housing and contributed disproportionately to empty homes. Continuing this development style is unsound and patterns of historic use are unlikely to change as a result of these

allocations. The addition of mixed-use sites is not a viable way of addressing housing need as they are not easily developed due to constraints placed on different user groups and financial obstacles. Evidence from previous mixed-use allocations shows that they are historically not developed in Calderdale and so due to these conflicts lowering viability they should be removed and allocated as single use sites. Socio-Economic issues The social and economic imbalances around Halifax Town Centre are often exaggerated by mixed use developments which reduces the potential for expansion of retail facilities and commercial opportunities, limiting overall growth in the district. The allocation of general market housing around the Eastern quadrants of Halifax Town Centre would help redress this imbalance. Additional better-quality housing is essential to redress the imbalance and will support initiatives such as the Piece Hall and other town centre improvements which are important to drive growth. Conclusion In conclusion the Plan is unsound because it does not help to combat Climate Change, is based on outdated principles of development, is contrary to the NPPF on fully sustainable development especially in relation to the Western more rural side of the borough. The Plan places reliance on large sites in the East to provide housing numbers whilst including substantial areas of land which have not been deliverable over the previous plan period and provides very little viable employment land. The Green Belt assessment lacks clarity over defensible boundaries and clearly defined land uses and does not afford any flexibility for growth nor provide suitable protection from encroachment and urban sprawl. It is clear the plan is unsound and it is respectfully requested that the current plan is withdrawn. Appendix 1 Local Plan allocations already in Primary housing Area since 2002 Todmorden Housing Provision LP0658 Cinderhills Mill 24 LP0914 Hollins Road 46 LP0635 Fir Street 37 Sowerby Bridge LP0438 Dean Lane 13 LP1655 Rawson House 22 LP1391 Upper Bentley Royd 20 LP1654 Pollit Fields 44 LP1415 Wakefield Road 12 LP0287 Willowfield Road 8 LP1004 Burnley Road Garage 26 Luddenden LP0253 Coach and Horses 11 Halifax LP0164 High Level Works 34 LP0452 Ovenden Green 98 LP1368 Furness Drive 91 LP0523 Furness Avenue 104 LP0242 Mixenden Road 14 LP1009 School Site 55 LP1489 Hambleton Crescent 14 LP1488 11 LP1487 14 LP1486 27 LP0238 St Bernadettes 12 LP1547 Abbey Park 75 LP1429 St Catherines School 83 LP1609 Titan Works 49 LP0815 Works Depot 73 LP0814 Richmond Street 45 LP0478 Ford Garage 11 LP0400 Birdcage Lane 6 Rastrick LP1032 Southages Quarry 42 Brighouse LP0945 Pond Quarry 62 Northowram LP0589 Back Clough 15 LP0759 Bell Vue Rise 16 Barkisland LP1027 Land of Stonelea 12 Greetland LP0964 Rochdale Road 14 LP0065 Nab End Lane 23 LP1283 Glenholme 11 Total houses allocated 1274 Appendix 2 Primary Employment Land not safeguarded from housing development since 2012 LP1534 Birks Mill 18 LP0938 Holme House 11 LP1224 JLA 30 LP1023 Kebroyd Mills 17 LP0011 Tenterfields 63 LP0407 Spring Hall Mills 16 LP0234 Swinton 93 LP1180 Old Lane Dyeworks 63 LP1425 Aluminium Works 105 LP0571 Birds Royd Lane 100 LP1077 Southedges Quarry 213 Total houses allocated 729 Appendix 3 Existing Employment Land allocated since 2002 Sowerby Bridge LP1640 Zodian House 1.33Ha Halifax LP1220 Adj Lloyds Bank 3.98Ha LP0409 Bob Lane 0.71Ha LP0976 Clarence Mill 0.43Ha LP1134 Shaw Lodge 1.05Ha LP1133 Sedbergh Road 2.87Ha LP0472 Lilly Lane 0.61Ha LP1433 Old Lane 0.24Ha LP1231 Shay Lane 1.19Ha LP0805 Railway Line 1.37Ha LP1217 Holmfield 1.31Ha LP1018 Holmfield 4.32Ha LP1219 Holmfield 6.28Ha LP0032 Croslee 1.94Ha LP0332 Brow Mills 0.53Ha Elland LP0059 Medical Centre 0.27Ha LP1443 Wistons Lane 0.5Ha LP0960 South Lane 5.86Ha LP1223 Lowfields 2.27Ha LP0009 Lowfields 3.08Ha Brighouse LP0585 Anchor Place 0.8Ha LP1232 Wakefield Road 21.38Ha Total Hectares of existing employment land re-allocated 62.32Ha

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

Duty to Co-operate Reason:

Suggested Modifications:

ensure LP1523 does not prejudice LP0826

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5610218>

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Comment ID **HRU167**

Site ref (if applicable): **LP1523**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU1681**

Site ref (if applicable): **LP1523**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU1715**

Site ref (if applicable): **LP1523**

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 LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU1729**

Site ref (if applicable): **LP1523**

Person ID: **1024946**

Name: **Mr D R Witcher**

Organisation: **Planning Officer Shibden**

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 site is unnecessary for the achievement of the Council's housing requirement. Further concentration on brownfield/under-utilised sites, 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:

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Comment ID **HRU175**

Site ref (if applicable): **LP1523**

Person ID: **1182651**

Name: **Mrs Sandra Whitehead**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give

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

Duty to Co-operate Reason:

Suggested Modifications:

I believe this proposed development should be removed from Calderdale Councils development plans.

Comments:

Additional Evidence Link:

Comment ID **HRU1763**

Site ref (if applicable): **LP1523**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add

further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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:

should remain green belt

Comments:

Additional Evidence Link:

Comment ID **HRU179**

Site ref (if applicable): **LP1523**

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 LP1523. My chief reason is the increased traffic congestion this development would create, taking into account the location and aspect of Westercroft Lane itself. At the very point of this proposed development, the lane narrows sharply, and on one side of the lane the pavement disappears. A little farther on, the lane then dips and is flanked either side by two tall retaining walls; the lane then narrows even further, meaning a lorry or even a transit van would take up both sides of the lane. And right on top of this there is a group of commercial properties and a large industrial unit, meaning that lorries are coming and going all the time. Go to the other end of Westercroft Lane (the Northowram end) and there is the main Halifax to Bradford road. At peak times this crossroad is horrendous. I have lived in Northowram since 1987, and driving from Hipperholme, Westercroft Lane is a shortcut for me. But I always avoid it ; even at quiet times of the day. So a development like LP1523 would only make matters worse, particularly for the residents who live there and have to get in and out of the

place. There is already a deceptively large number of properties on, and cul-de-sacs off, Westercroft Lane; and Hedge Top Lane (the cul-de-sac closest to Halifax/Bradford road) contains more properties than Westercroft Lane itself. And in the last couple of years five four-bedroom town houses and four or five detached properties have been squeezed onto this cul-de-sac as well, exacerbating problems even more. Basically, Westercroft Lane is a narrow country lane with cows and horses grazing on the remaining fields. It has already been over-developed, and it is my personal view that no further development should be allowed on this lane at all. It is for these reasons I think LP1523 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:

Comment ID **HRU187**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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:

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Comment ID **HRU192**

Site ref (if applicable): **LP1523**

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 doctores 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. 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 **HRU196**

Site ref (if applicable): **LP1523**

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. 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 **HRU205**

Site ref (if applicable): **LP1523**

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".

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

Sound Reason:

These are my comments for site LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: [- "To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU211**

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:

These are my comments for site LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU217**

Site ref (if applicable): **LP1523**

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 LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: [-“ To assist in safeguarding the countryside from encroachment”] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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. End of suggested 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:

Comment ID **HRU224**

Site ref (if applicable): **LP1523**

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 LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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:

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Comment ID **HRU225**

Site ref (if applicable): **LP1523**

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?: **Yes**

Sound Reason:

These are my comments for site LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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:

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Comment ID **HRU2266**

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 **HRU2289**

Site ref (if applicable):

Person ID: **1139215**

Name: **Miss Kathryn Dawson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

See 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/5635617>

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Comment ID **HRU2294**

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 **HRU2303**

Site ref (if applicable):

Person ID: **1129438**

Name: **Mr Paul Hughes**

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/5635668>

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Comment ID **HRU2307**

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 **HRU2309**

Site ref (if applicable):

Person ID: **1129422**

Name: **Mrs Susan Hughes**

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/5635671>

Comment ID **HRU236**

Site ref (if applicable): **LP1523**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU247**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 remain designated Green Belt and be removed from the Local Plan

Comments:

Additional Evidence Link:

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Comment ID **HRU253**

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: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU254**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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:

I propose that the land remain as Green Belt.

Comments:

Additional Evidence Link:

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Comment ID **HRU255**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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:

I propose that the land remain as Green Belt.

Comments:

Additional Evidence Link:

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Comment ID **HRU275**

Site ref (if applicable): **LP1523**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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:

I propose that the land remain as Green Belt.

Comments:

Additional Evidence Link:

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Comment ID **HRU278**

Site ref (if applicable): **LP1523**

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 LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU284**

Site ref (if applicable): **LP1523**

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:

These are my comments for site LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: [-“ To assist in safeguarding the countryside from encroachment”] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU285**

Site ref (if applicable): **LP1523**

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:

These are my comments for site LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with

the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: [-“ To assist in safeguarding the countryside from encroachment”] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU29**

Site ref (if applicable): **LP1523**

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:

Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: [-“ To assist

in safeguarding the countryside from encroachment" is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 remain designated Green Belt and be removed from the Local Plan

Comments:

Additional Evidence Link:

Comment ID **HRU297**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment" is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site

fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 LOCAL PLAN

Comments:

Additional Evidence Link:

Comment ID **HRU299**

Site ref (if applicable): **LP1523**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of

Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU307**

Site ref (if applicable): **LP1523**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will

intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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:

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Comment ID **HRU321**

Site ref (if applicable): **LP1523**

Person ID: **1242102**

Name: **Mrs D 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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). In addition, Westercroft Lane becomes very narrow ( single lane) as does the footpath in the direction of

Lumbrook. Adding further traffic to this bottleneck would significantly increase dangers to vulnerable pedestrians (of which there would inevitably be more). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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. The community services, such as Northowram School and Northowram Doctors Surgery (including Kos Clinic in Hipperholme) are already at capacity and currently cannot provide timely appts . Are there further plans to support/expand these services in line with over population of these areas? 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 area should not be developed and remain as Greenspace.

Comments:

Additional Evidence Link:

Comment ID **HRU322**

Site ref (if applicable): **LP1523**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will

intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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:

Comments:

Additional Evidence Link:

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Comment ID **HRU333**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in

wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU362**

Site ref (if applicable): **LP1523**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU365**

Site ref (if applicable): **LP1523**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU369**

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:

Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 this site is removed from the plan

Comments:

Additional Evidence Link:

Comment ID **HRU372**

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 LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU375**

Site ref (if applicable): **LP1523**

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 LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: [-" To assist in safeguarding the countryside from encroachment" is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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

**HRU376**

Site ref (if applicable):

Person ID: **1242434**

Name: **Mrs Nicola Dumbreck**

Organisation:

Agent ID:

Name:

Organisation:

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU379**

Site ref (if applicable): **LP1523**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU394**

Site ref (if applicable): **LP1523**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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

HRU405

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU407**

Site ref (if applicable): **LP1523**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU413**

Site ref (if applicable): **LP1523**

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 LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: [-“ To assist in safeguarding the countryside from encroachment”] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU418**

Site ref (if applicable):

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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:

Take out of the Local Plan

Comments:

Additional Evidence Link:

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Comment ID **HRU424**

Site ref (if applicable): **LP1523**

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 LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU437**

Site ref (if applicable): **LP1523**

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:

Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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

**HRU446**

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 LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfills ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfill Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU463**

Site ref (if applicable): **LP1523**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 this application should be removed from the local plan

Comments:

Additional Evidence Link:

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Comment ID **HRU47**

Site ref (if applicable):

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 LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: [-“ To assist in safeguarding the countryside from encroachment”] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

The site should be removed from the local plan

Comments:

Additional Evidence Link:

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Comment ID **HRU487**

Site ref (if applicable): **LP1523**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 propose that this land remains part of the green belt.

Comments:

Additional Evidence Link:

Comment ID **HRU492**

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 assessment that this site fulfils ONLY three of the five purposes of

Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: [-"To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU537**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: [-" To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site

fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU542**

Site ref (if applicable): **1523**

Person ID: **1115442**

Name: **Mrs Dianne Greaves**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

This site on Westercroft Lane does not comply with all considerations to be considered when building on green belt land, that is it increases urban sprawl from Northowram and joins it to the ancient hamlet of Westercroft which is not part of Northowram. The site at present has no access onto Westercroft Lane and any access made will be on a bend. It would increase homes on the lane by around 50% on an already busy lane, at present traffic at peak times can be queuing up to half its length trying to exit either end, also this lane is partly single track. Building in this area will significantly increase traffic problems at Hipperholme

Crossroads, Stump Cross and Shelf Roundabout which already congested and cause unacceptable pollution levels. The site is consistently flooded and there are no main sewers in the area, the hamlet of Westercroft having septic tanks. I

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

Duty to Co-operate Reason:

Suggested Modifications:

The site on Westercroft Lane should be extracted as it does not fully comply with building on green belt land.

Comments:

Additional Evidence Link:

Comment ID **HRU545**

Site ref (if applicable): **LP1523**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU562**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU572**

Site ref (if applicable): **LP1523**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU580**

Site ref (if applicable): **LP1523**

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 LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: [-“ To assist in safeguarding the countryside from encroachment”] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU597**

Site ref (if applicable): **LP1523**

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 LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU614**

Site ref (if applicable): **LP1523**

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 LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU634**

Site ref (if applicable): **LP1523**

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU65**

Site ref (if applicable): **LP1523**

Person ID: **1241375**

Name: **Mr John 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:

These are my comments for site LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: [-" To assist in safeguarding the countryside from encroachment" is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Modifications The site should be removed from the local plan

Comments:

Additional Evidence Link:

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Comment ID **HRU658**

Site ref (if applicable):

Person ID: **1243083**

Name: **Mrs Gillian Marks**

Organisation:

Agent ID:

Name:

Organisation:

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 LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: [-" To assist in safeguarding the countryside from encroachment" is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU672**

Site ref (if applicable): **LP1523**

Person ID: **1121443** Name: **Mrs Christine Moussavi** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add

further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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. This site should be removed from the Local Plan

Comments:

Additional Evidence Link:

Comment ID **HRU677**

Site ref (if applicable): **LP1523**

Person ID: **1122554**

Name: **Mr Hadi Moussavi**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU687**

Site ref (if applicable):

Person ID: **1131906**

Name: **Mr Matthew Ambler**

Organisation:

Agent ID:

Name:

Organisation:

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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU696**

Site ref (if applicable):

Person ID: **1182105**

Name: **Mr Kearn Chappell**

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 **HRU697**

Site ref (if applicable):

Person ID: **1182105**

Name: **Mr Kearn Chappell**

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 **HRU733**

Site ref (if applicable): **LP1523**

Person ID: **1128586**

Name: **Mr Martin Wood**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: Westercroft lane is already a rat run with junctions having queuing traffic even outside of rush hour. Additional traffic will make these roads less safe, busier and worsen air quality. Per other comments: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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. It shows disregard for for the green belt, the lived environment of Northowram, increases traffic on already congested roads, will worsen air quality and of course there is no other infrastructure planned to support the increase in population. More of Calderdale letting developers do what they want, taking the money and leaving the council and local residents to pay the price.

Comments:

Additional Evidence Link:

Comment ID **HRU743**

Site ref (if applicable): **LP1523**

Person ID: **514242**

Name: **Mrs Barbara Tempest**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU75**

Site ref (if applicable): **LP1523**

Person ID: **1094032**

Name: **Mrs Sue Chadwick**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: [-" To assist in safeguarding the countryside from encroachment" is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU79**

Site ref (if applicable): **LP1523**

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

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: [-" To assist in safeguarding the countryside from encroachment" is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 remain designated Green Belt and be removed from the Local Plan

Comments:

Additional Evidence Link:

Comment ID **HRU859**

Site ref (if applicable):

Person ID: **1241010**

Name: **Mr Carl Pope**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU861**

Site ref (if applicable):

Person ID: **1094470**

Name: **Miss Sadie 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:

My comments below detail why this is NOT a sound plan.

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:

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Comment ID **HRU868**

Site ref (if applicable): **LP1523**

Person ID: **1094470**

Name: **Miss Sadie 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:

The proposed building site is green belt land which marks a boundary of Northowram village and the

hamlet of Westercroft. The primary purpose of designating green belt zones is to prevent urban sprawl. Over the recent years Northowram has grown dramatically in size as a result of the building of houses and therefore, to open specifically designated green belt land to facilitate further building of properties in an already over populated village would be a direct contradiction of the specific purpose of green belt land. These zones should be preserved and protected at all costs. In the specific case of the proposals at site no. LP1523 the development would grossly overwhelm the area. The boundary between Northowram and Westercroft should be maintained to prevent further urban sprawl. Building at the site would be in direct contravention to the purpose of green belt land. To approve the building at the site would create a precedent meaning that it would be difficult to object to other proposals. The site is the last remaining area of green belt of any significance separating the hamlet of Westercroft from the main urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The Council's assessment for Purpose III (to assist in safeguarding the countryside from encroachment) is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. Westercroft Lane is a narrow road which is just one lane in areas. It simply cannot cope with any further traffic, let alone 51 houses which are being proposed on the site. The road is dangerous when there is an event on at the cricket fields and people park on the roadside making the road one lane which is impossible to pass and at the bend completely blind. During the summer when travelling from the Brighouse and Denholme Gate Road to the Bradford Road the low sun is blinding and dangerous and further congestion on that road will inevitably lead to accidents. Access to the proposed site would have to be at a place in the road which would inevitably be dangerous and lead to preventable accidents. The proposed building would result in further congestion on an unsuitable and inappropriate road. The site will cause disproportionate traffic generation, problems, access and safety problems. The infrastructure is simply not adequate to service the proposed development. I have reviewed the Site Assessment Report which was clearly prepared by someone without knowledge of the local area and with unrealistic expectations. I would question whether they have even visited the site and if so, at what times. The comments made within the report are completely contradictory to the reality of the situation and I am frankly dismayed at the report and the contents of it. In my view the report is not objective and not representative of the position. To accept that report on face value is, in my view, a public safety concern. To suggest that the building of any houses, let alone 51 houses, in that location would have no significant impact on the road network is an appalling misrepresentation. Indeed to suggest that there are no access issues and that there are two safe and convenient access points is again a gross misrepresentation. There is a private road leading onto Westercroft Lane which is located below the proposed development. This is a single road and allows access to 6 properties. When there is an event on at the cricket fields access is dangerous. To create access points on the same stretch of road for 51 houses which is likely to mean at the very least 51 cars, is to say the least dangerous but also wholly irresponsible. The site will intensify pressure on the narrow Westercroft Lane and its junction with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). The local highway network in Northowram and 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 whole area. There is insufficient drainage in the area to be able to cope with building on the site as the recent weather has clearly demonstrated. The site sits at the top of a valley. I understand that there are already grave issues with flooding in the valley and as such further building at the site will aggravate this. On a more local level, the site is subject to flooding. The land is boggy and already suffers from the downward flow of water during times of heavy rain. The site is of historical significance and is the site of the oldest property in the area and should be protected as such. To impose an unattractive and sprawling housing estate on the site disregards this historic environment and is not in keeping with the stylistic context of the local area. There are insufficient services and amenities within the local area. The building of

51 houses on the site will presumably attract families. How will the local school, Doctors and amenities cope with the demands of further building in an already over populated village. This has clearly not been given realistic consideration. There are six properties immediately below the site. The proposed development will have a negative impact on the amenity of the properties through the noise, overlooking, overshadowing, smell, light pollution, loss of daylight, loss of privacy, dust, vibration and late night activity that the building of 51 properties will generated. During the summer the field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecological survey should be carried out before allocating this site. Bats have been sighted at the site. I have not seen any acknowledgment of this in any of the reports that I have reviewed. Has an assessment been carried out? It is eminently clear that no real consideration has been given to the reality of the situation or the impact the proposals will have on the local area as a whole. The loss of greenbelt land and lack of infrastructure, services and amenities and drainage are the main objection in respect of the site but in addition, the ecological consideration, which have not even been acknowledged in the site assessment report and the historical considerations. The site is one of 12 proposed new housing sites in Northowram and Shelf, which would increase the number of houses by 959. This scale of development will drastically change the nature of the community and local environment and cause unsustainable pressure on narrow local roads and other social infrastructure. Instead the focus of development in Calerdale'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 **HRU890**

Site ref (if applicable):

Person ID: **1122593**

Name: **Ms Janet Griffiths**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

These are my comments for site LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four

of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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 **HRU904**

Site ref (if applicable):

Person ID: **1181809**

Name: **Mr Paul Stables**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area 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 **HRU91**

Site ref (if applicable): **LP1523**

Person ID: **1092924**

Name: **Mrs Lisa 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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will

intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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:

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Comment ID **HRU94**

Site ref (if applicable): **LP1523**

Person ID: **1241527**

Name: **Mr Jonathan 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 assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). The local highway network in Northowram & Shelf is already congested but no figures for current or future

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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 **HRU981**

Site ref (if applicable): **LP1523**

Person ID: **1243818**

Name: **Miss Kate Thwaites**

Organisation:

Agent ID:

Name:

Organisation:

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 LP1523 Land at Westercroft Lane, Northowram Greenbelt: I disagree with the Council's assessment that this site fulfils ONLY three of the five purposes of Green Belt and is therefore rated as 'highly sensitive'. The council's assessment for Purpose III: ["To assist in safeguarding the countryside from encroachment"] is illogical and lacking in objectivity and several of the negative outcomes are wrong. The correct outcome is that it does fulfil Purpose III resulting in the site fulfilling four of the five purposes and being rated as 'most sensitive'. This site is the last remaining area of Green Belt of any significance separating the hamlet of Westercroft from the main urban area of Northowram. Development would lead to urban creep towards the village envelope of Lumbrook and give an uneven development pattern leaving other areas of Green Belt vulnerable. Highways: This site will intensify pressure on the narrow Westercroft Lane and its junctions with the A644 and A6036. It will add further pressure to the nearby Hipperholme junction and Air Quality Management Area (A58/A644). 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. Ecology: During the summer this field is covered in wildflowers and grasses that provide habitat and feeding sites for birds, insects and mammals. A full, independent ecology survey should be carried out before allocating this site. 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:

## **Main Issues and Council Response**

### **Legal Compliance**

Main Issues:

1. No evidence all other reasonable options have been considered prior to amendments to Green Belt, including considering all brownfield sites.

Council's Response:

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

### **Test of Soundness**

## Main Issues:

1. Loss of Green Belt - Green Belt assessment is incorrect. This Green Belt does safeguard from encroachment, and development would lead to urban creep towards the Lumbrook Village Envelope.
2. Local road network, specifically network capacity, including at Hipperholme junction, congestion and on street parking. Lack of current and future traffic volumes preventing an informed understanding of future problems, including air quality and the Air Quality Management Area (A58/A644).
3. Ecology - the site provides habitat and feeding for birds, insects and mammals. A full ecology survey should be undertaken prior to allocation. Bats have been sighted.
4. Cumulative impact with other sites in the area, and with level of development taken place in the locality in recent years.
5. Focus should be on regeneration of brownfield sites in town centres. More efficient use of brownfield sites would be more appropriate.
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, poor drainage.
8. Impact on historic environment. 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 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. For clarity, Lumbrook is no longer a Village Envelope, but an inset village.
2. 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.

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 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 terms of traffic volumes the information is contained in the various Technical Notes. These can be found on the Local Plan section of the Calderdale website under "Evidence Base: Transport"

For example observed and modelled base traffic is included in Appendix H of the Local Model Validation Report (October 2016)

Future traffic and the impact in terms of delays are contained in Technical Note 9 "Assessment of Cumulative Impact".

Any Individual applications would be required to produce a Transport Statement or Assessment detailing the traffic impact.

For larger sites more detailed individual junction models would be required and any mitigating measures identified

3. The Conservation Section (Ecology) has indicated that development would be acceptable subject to various mitigation measures which have been included as site specific considerations. The 'Technical Reports Required' includes the submission of an Ecological Assessment.

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 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.

5. 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.

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 including detail on education provision.

7. 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 provision of SuDS is included in the 'Site Specific Considerations' as recommended by the Council's Flooding and Drainage Section, to reduce the infiltration rate of precipitation as well as provide storage for storm water run-off.

8. A Heritage Impact Assessment has been undertaken, and concluded that development may have some impact on a non-designated heritage asset.

Given the lack of fundamental constraints and the need to find additional sites to meet a higher housing need, the site has however, been identified as an Additional Housing Site. 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:

Council's Response:

### **Suggested Modifications**

1. Remove this site from the Local Plan.
2. Amend Site Specific Consideration to ensure no harm to setting of heritage assets in the vicinity.

Council's Response:

1. No change required - The Council considers that the evidence submitted supports and justifies the content of the Local Plan.
2. 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: 14 Ripponden 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 **HRU1166**

Site ref (if applicable): **LP1602**

Person ID: **1242917**

Name: **Mrs Patricia Earnshaw**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I cannot answer this. I have no knowledge of planning legislation. It is however very misleading that this site is referred to as Greenfield when it is actually most sensitive Green Belt.

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

Sound Reason:

Site LP1602 is Green Belt land the purpose of which is to prevent urban sprawl. It has obviously always been a highly significant piece of Green Belt land given all the rejected planning applications relating to the stables over the years. Site LP1602 was filtered out from the draft local plan due to the harm it would cause to this Most Sensitive Green Belt land and Special Landscape Area. It is most unfair to neighbouring residents that it has been re-submitted as an additional housing site, causing them yet further stress. I find it disturbing that such a historically important stretch of land can simply just be removed from the Green Belt for convenience. Green Belt land must be protected for the future generations. I cannot see that there will be any growth in employment in Barkisland that supports a need for additional housing here. New residents are highly likely to work out of the area, possibly not even in Calderdale, and this highly important Green Belt land will have been lost forever for no reason. The plan does not comply with planning policy regarding the Green Belt. There are no exceptional circumstances that justify the release of this land for housing. The increased traffic from vehicles associated with this site will have a significant impact on the already very busy daily flow of traffic through Barkisland. The road network cannot cope as it. Both junctions with Jackson Lane and the main roads are dangerous. It is very difficult to exit the lane into the speeding traffic on the main roads. This development will most likely bring 48 vehicles which will increase the risk of more accidents at these junctions. There have already been several serious collisions at both junctions due to people driving far too fast on the main roads. There is very likely to be an overspill of cars from this site that will end up parking on the lane, as developers do not seem to provide enough parking for the homeowners and their visitors. The lane is too narrow to accommodate this and is only wide enough for one vehicle in parts. This is a rural lane regularly used by farmers in their tractors. So many parked cars will cause them an obstruction and it will also make it difficult for emergency service vehicles to gain access. This site is a pleasant visual amenity for the many local people who enjoy walking, running, cycling and horse riding along Jackson Lane and also for those living in neighbouring properties as it offers them lovely views across the valley. Removing this open space and filling it with so many houses will have a significant negative impact on the health and well being of residents. This is a rural village, not an urban area. Policy NE 12 (GN4 in the draft local plan) states development which would adversely affect landscape quality will not be permitted. A development of this size will be unsightly and being at the top of the hill it will be seen from miles around. It will cause significant harm to the Special Landscape Area. The infrastructure is not adequate to support any further development in Barkisland. The village school and other primary schools in the local area are oversubscribed and have been for many years. There certainly

will not be places for any children living on this development. They are likely to have to travel some distance to find a school that does have places. Other local amenities are also already under immense pressure due to previous developments in the village. The shop is very small and unable to expand and there is a very small park which is totally inadequate for the number of children in the village. The local bus services are under constant threat of being removed due to lack of use. There is no GP surgery in the village. The local surgery in Ripponden is oversubscribed and is also under pressure from developments in that area. New residents will find it difficult to register with a GP. This development will put Barkisland at risk of losing its identity as a rural village. I have seen the expansion of the village over many years and I feel that it has now grown to capacity. To increase the population further will put even more pressure on amenities that are already over-stretched and cause unnecessary stress to those people already living here. There are many brownfield sites in Calderdale, in locations that are much more sustainable than Barkisland. The Council must explore these options first and encourage builders to develop them. In my opinion no Green Belt land should ever be released for housing until every brownfield site has been fully utilised.

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

Duty to Co-operate Reason:

The plan does not demonstrate effective consultation with public bodies to address issues such as the lack of infrastructure. Nor has there been any effective communication by the council with members of the public to raise awareness of this revised local plan.

Suggested Modifications:

Remove site LP1602 from the local plan

Comments:

Additional Evidence Link:

Comment ID **HRU1354**

Site ref (if applicable): **LP1602**

Person ID: **1130272**

Name: **Mr Nicholas Gaukrodger**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I am unable to comment on legal compliance. I have no knowledge of planning legislation.

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

Sound Reason:

This site was filtered out of the initial draft local plan for sound reasons i.e. it is most sensitive Green Belt land and within a Special Landscape Area. This is still the case. The Council's own site assessment report shows a red traffic light score for the significant harm this site would have on the landscape. I cannot comprehend why such an important Green Belt site can be added back into the plan for housing. It seems it's an easy option taken by the Council to address the Inspector's concerns that housing numbers will not meet predicted employment growth. What effort has Calderdale Council made to explore further

Brownfield opportunities to increase housing stock? There are many Brownfield sites in Calderdale and the Council should be actively encouraging builders to develop these. The plan does not comply with national policy regarding the protection of the Green Belt. There are no exceptional circumstances to justify the release of this important piece of Green Belt land for housing ; evidenced in all the previous planning applications relating to this site. The number of refused planning applications and a dismissed appeal relating to the stables over four decades clearly show its importance as Green Belt land. The Infrastructure to support further development in Barkisland does not exist. Calderdale Council refers to the lack of services in Barkisland in its own Green Belt Review published in 2017 and the limited services here have become even more stretched since then. The small shop and tiny park cannot cope now with the number of residents, visitors and people passing through. The school is oversubscribed and has been year after year. This is also the case for all the other primary schools in the Ryburn area, and also with Ryburn Valley High School. Many of the new children from this and other potential local developments will have to travel some distance to attend schools that do have places. Dwellings should be built close to employment sites in order for developments to be sustainable and to comply with environmental policy. Any employment growth in Barkisland is highly unlikely. New residents here will use their cars to get to their places of employment as there is a very limited public bus service in Barkisland. They may well not even work in Calderdale given the proximity to the motorway network. The extra traffic created by this size of development would have a negative impact on the road network in Barkisland which is already very busy. Realistically there will be 48 cars with this development. Vehicles will constantly be parked on the lane because there will no doubt not be enough parking for new residents and their visitors. This will cause a hazard for emergency services, local farmers, existing residents and all the walkers, equestrians and cyclists who regularly use the lane. There have been a high number of very serious accidents in recent years at both junctions with the main roads. Increasing the number of vehicles using Jackson lane will increase the risk of further accidents. There is no suitable access to this development from Jackson Lane. It is too narrow nearer to the Stainland Road end and having the access further along the lane would create access difficulties for the existing residents living on Jackson Lane and Jackson Meadows. Any work carried out to widen the lane would be highly disruptive to the existing residents. It will also spoil the appearance. It is a rural country lane and it should not be turned into an urban street. Building houses on this site will cause severe disruption to neighbouring residents which will be prolonged by delays in construction due to the regular inclement weather conditions. It is an exposed site and the frequent strong winds will make building difficult and dangerous. Therefore the plan is unsound in my view and site LP1602 should be removed.

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

Duty to Co-operate Reason:

Calderdale Council has not communicated effectively with local residents to make them aware that this site has been put back into the local plan. Many people do not use social media and have only heard by word of mouth from other residents. All local households should have been appropriately informed.

Suggested Modifications:

Remove site LP1602 from the plan.

Comments:

Additional Evidence Link:

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Comment ID **HRU1412**

Site ref (if applicable): **LP1602**

Person ID: **1243984**

Name: **Mr Andrew Nelson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Our primary objection is that this is Green Belt land. We are also surprised the council is considering an application for a 24 house development when it has previously rejected an application for a lot less houses in the past.

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

Sound Reason:

It seems a very small site on which to be building 24 houses and access from Jackson Lane is inadequate and indeed can be considered dangerous. It is also in a Special Landscape Area so we fail to see how this proposed development meets such a status. We are also unconvinced sufficient consideration has been given to the necessary infrastructure to support such a development

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

Duty to Co-operate Reason:

This plot of land is considered by CMBC as -"most sensitive greenbelt" If this is the case why has another application been made as a means of increasing housing capacity in Calderdale? We feel this is unreasonable and that this plot of land should be excluded from the Local Plan. Also we are not aware of any consultation of local residents about this revised plan.

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1416**

Site ref (if applicable): **LP1602**

Person ID: **1243989**

Name: **Dr Rachel Moser**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Unknown whether the plan is legally compliant but this land is designated as green belt and there is insufficient justification to explain why it is acceptable to disregard that.

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

Sound Reason:

Addition of a further 24 houses in Barkisland in this location is not sound and cannot be considered

sustainable development. The public transport infrastructure links serving the village are minimal. Prospective new residents are likely to be employed in larger towns and cities and even those working in Halifax or Huddersfield will more than likely opt to drive to work given the very limited public transport options. Thus this development is almost guaranteed to significantly increase traffic flow through Barkisland and the surrounding routes and goes against Calderdale's own commitments to sustainable development. Barkisland has minimal amenities and the school and others in the area are already oversubscribed and unable to be extended. Thus the development risks the likelihood of families moving into the proposed development adding to school traffic in the local areas if they are unable to secure places at the local school and are forced to travel for a school place. The junctions at either end of Jackson Lane are already dangerous and the site of frequent road traffic accidents which given this is so close to the school must be a consideration. Significant additional traffic will only exacerbate this danger. The proposed development will certainly have a negative visual impact given its location on the skyline. Residents of The Cross in particular will experience a significant loss of privacy.

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

Duty to Co-operate Reason:

Given the significantly detrimental impact on privacy of the residents of The Cross a duty to cooperate would surely have involved some direct engagement with those residents. Instead we've found out about the proposals indirectly through social media and helpful and informed local residents who have been proactive in seeking out knowledge on the plan. This proposal seems entirely out of keeping with a commitment to sustainable development. It will add significantly to traffic pollution because prospective residents will have no option but to use cars.

Suggested Modifications:

Seek more sustainable locations for development. Brownfield sites closer to the larger towns and cities where there are much better public transport links.

Comments:

Additional Evidence Link:

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Comment ID **HRU1467**

Site ref (if applicable): **LP1602**

Person ID: **1243331**

Name: **Mr Michael Herring**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I am not a legally trained person but it seems to me that CMBC are bending every rule in the book to allow housing development on this land when so many previous applications have been rejected. I do appreciate that more housing is needed but this site is not the location for it.

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

Sound Reason:

A succession of previous applications to develop this land for housing have been repeatedly rejected as

unsuitable, inappropriate and unsound despite the applicants using ever increasing amounts of so called 'compelling evidence'. I have lived in the village for over 25 years and the land has always been stables and should remain as such. And yet now we have a proposal deemed unsuitable for one dwelling which proposes 24 dwellings!!! This proposal is a combination of a nightmare and Groundhog Day rolled into one. Whoever thinks up these madcap schemes? Conveniently, for the proposal, the land designation has been changed from green belt to green field. Talk about moving goal posts! The land is on an almost single track lane which joins two busy main roads with junctions at either end. Visibility right and left at both these junctions is not good. Assuming a minimum of just one vehicle per dwelling even this will dramatically increase the vehicular traffic on this quiet lane. The new residents would need vehicles as the local bus service has been repeatedly reduced and made less convenient to anyone who attempts to use it. Also, the village only has one shop, the Post Office so residents invariably use vehicles to go shopping. The village has only one school which is heavily populated by children from outside the village. One only has to observe the daily term time traffic chaos on roads around the school which is nearby to this planned development. I am led to believe that CMBC are on the point of installing traffic calming measures near to the school, just around the corner from this development. In the next breath they then propose to increase traffic by allowing this development. Local residents are all aware of regular RTA's at junctions in the village, all close by to this development. Jackson Lane is also used by pedestrians, dog walkers and some cyclists. Having the extra vehicular traffic that this proposal would create would greatly reduce the safe passage of users along Jackson Lane. I have concerns about what the building of 24 dwellings would look like. The residents of properties that back onto Jackson Lane would be overlooked by these dwellings and the rural aspects that they currently enjoy would be lost

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

Duty to Co-operate Reason:

I have no idea about this. The legal gobbledygook used by this procedure is designed to baffle all but the best legal brains. There is no hope that the common man could understand it.

Suggested Modifications:

Quite simply, do not build dwellings of any size or number on this land.

Comments:

Additional Evidence Link:

Comment ID **HRU148**

Site ref (if applicable): **LP1602**

Person ID: **1241796**

Name: **Ms Elizabeth Haigh**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

although I do not know enough about this aspect to give an informed answer.

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

Sound Reason:

I object to the plan to build houses on Jackson Lane. This is Green belt area and on the skyline. Putting up 24 townhouses is a huge visual imposition. It will not only have a visual impact on the skyline from the village side but for anyone living in the valley below and opposite The school has already been extended - it cannot possibly take any more children. School traffic is already a nightmare with cars sometimes parked up Stainland Road almost to Jackson Lane. In terms of highway safety and traffic - both ends of Jackson Lane are dangerous - at peak traffic times it's very difficult to get out of the junctions so without oncoming cars having to break because they drive too quickly and both junctions are hidden. I live opposite one end, on Stainland Rd and witness regular near misses as cars pull into the main traffic from Jackson Lane. I often see evidence of minor scrapes on walls/pavement or headlight glass on the road. On two occasions cars have ended up in our gardens. The infrastructure cannot support these houses and cars they will bring. it will bring extra nuisance to residents already struggling with traffic this struggle is shown by the need for recently proposed traffic calming scheme along Stainland Road The number of houses is over development and over crowding and is also out of character with the local area bringing an adverse visual impact - not only for residents but for anyone that lives in the valley and will see the houses on the skyline There are plans to put traffic calming schemes on Stainland Road only metres from the end of Jackson Lane - this will increase the risk of accidents as cars will have to suddenly slow down close to the junction with Jackson Lane to allow for the humps. There is also a bus stop right at the end of Jackson Lane so more increased risk. Finally the recently released planned improvements to the A58 include plans to re route lorries and trucks through Barkisland to get to Halifax instead of driving through Sowerby Bridge. This is going to have a huge effect to increase traffic coming into the village past both ends of Jackson Lane. This further increases the risk of accidents and increased the number of cars and the village infrastructure. It's almost as though these 3 plans - the Local Plan, the traffic calming scheme and the A58 plan have absolutely no links between them and no holistic view of how the residents of Barkisland are going to be affected.

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

Duty to Co-operate Reason:

I have no idea. The explanation of this aspect is not clear enough. I feel the A58 plans should clearly consider how Barkisland is going to be affected and in turn how this impacts on the Local Plan

Suggested Modifications:

Comments:

Additional Evidence Link:

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Comment ID **HRU1502**

Site ref (if applicable): **LP1602**

Person ID: **1243412**

Name: **Mr Mark Osborne**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

This plan is not legally sound. Firstly, the Council has designated the land in this proposal as Greenfield when it is actually Greenbelt Land. This is not a small issue of semantics. The key difference being that Greenfield is land that has never been built on whereas the Greenbelt is land is protected from

development. One of two conclusions can be reached from the incorrect designation of the type of land. The first of these is that the council are attempting to mislead local residents into believing that the land is not Greenbelt. If this is not the case then the council are actually unaware of the correct type of land upon which they intend to build 24 properties. The council has therefore either acted incompetently or deceitfully. Numerous previous applications to demolish the current stables at the site and build one house have been rejected. On this basis, how can 24 properties be built on the land if the construction of one was deemed non compliant by the council and planning inspector?

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

Sound Reason:

This plan is not sound. The application to build an entire housing estate in a small horse field is an enormous oversight on the council's behalf for a number of reasons. 24 new houses would bring with them a large number of new residents. How many? Without knowing the size of the proposed houses this is difficult to estimate, however its not unreasonable to assume that there could be as many as 100 new residents moving into the tiny plot. This is completely unfeasible, both current residents and the unfortunate 'hypothetical' new residents. Jackson Lane, the only viable access to the development is completely unsuitable to support the additional burden of traffic. There are no pavements, or room for any to be installed on the road which is already incapable of supporting two way traffic in most places. Jackson Lane can also only be accessed by two famously precarious junctions which are accident hotspots. Only more accidents could be expected if this proposed development is completed. The addition of this amount of new homes and the cars that would undoubtedly accompany them would also create an enormous amount of noise and light pollution for existing residents. The fantastic skyline view from the top of Barkisland would also be ruined for all! The existing horse field is also designated by the council as a Special Landscape area. The development would not only destroy this area of natural beauty but also compromise the habitats of existing wildlife including the thriving bat population; whose presence in the area I can testify to having lived in the area for most of my life. Also, urbanising this grassy area of the countryside would only contribute further to flooding in Calderdale. The council's plan to build 24 houses on such a small area of land would have an enormous impact on the local area.

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

Duty to Co-operate Reason:

After reviewing the councils website I have found it difficult to understand exactly what the duty to cooperate is. I am not the only person in this situation as the comments show that at least one other resident is in the same situation. It would appear that the council is attempting to make any objection to its plan an overly complex and laborious procedure for anybody hoping to offer an opinion.

Suggested Modifications:

Remove LP1602 from the local plan

Comments:

Additional Evidence Link:

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Comment ID **HRU1551**

Site ref (if applicable): **LP1602**

Person ID: **1244106**

Name: **Mr Andrew Osborne**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

This land has always been protected as Green Belt and should continue to be. Additionally it is within a special landscape area. The greenbelt review demonstrated this land met the tests wholly for inclusion in the greenbelt and thus is to be honoured. Previous planning applications have all been refused based on the harm to the local environment and noncompliance with Greenbelt policy, this is not to be an exception. Reclassifying the site as Greenfield from green belt appears to have been done to enable inclusion in the latest development plan, seemingly going against the Council's own policy and shockingly in addition to national policies, which note amongst other things that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. This is not the case for this site. There are no exceptional circumstances, just another property developer hoping to build to the detriment of the area.

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

Sound Reason:

This proposal will bring significant adverse impact on the character and visual amenity. At the last planning appeal for just one stables conversion, the planning inspectorate noted very special circumstances to justify the proposal do not exist and therefore for the reasons given above and having regard to all other matters raised, I conclude that the appeal should be dismissed.' Plans for 24 houses on a site contradict the inspectorate ruling and the local plan does not in any way include any evidence to demonstrate exceptional circumstance required to build in the green belt. The site is a haven for wildlife and bats are evident at dusk. The site is small so the plan to provide 24 houses with adequate gardens and parking for likely 48 cars is unrealistic, leading to overspill locally. The site is on top of a hill so houses will absolutely impact the skyline detrimentally. This will bring serious privacy issues with existing nearby properties. The 24 figure may be a teaser for the council which could be replaced with fewer larger dwellings, meaning that inclusion in the plan would fail to deliver against objectives. Jackson lane is a narrow lane without full footpath and is not an option for major use. The access is dangerous and there have recently been accidents at the junction with Stainland road, a busy carriageway link for the village. Adding the weight of cars from a mini estate is only going to present further risk to life which can it be sufficiently mitigated without complex, expensive and involved alterations to the surrounding landscape and highways. Public transport is poor and irregular meaning that residents would be dependent on cars to the detriment of the local environment causing more noise and air pollution. There is little local employment, meaning that this would simply be a commuter estate. Schools, doctors, dental surgeries and more are all over subscribed. The plan does nothing materially to improve these infrastructure issues and I can't see how it can be classed as sound based on the above information.

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

Duty to Co-operate Reason:

I understand this duty is about cooperating or consulting with relevant bodies to drive a sensible development strategy forward. I don't understand how the council could have met its obligations here where it would be evident on consultation that other local strategic services are over subscribed, e.g. schools, doctors, dentists, lack of employment, just one village shop. The access road is dangerous and not up to standard to much heavier use once complete, so the development traffic and heavy vehicles required bring significant risk to life. I also feel there has been a lack of transparency about the local plan. Residents have only found out about it by accident or direct enquiry. Few people read the local newspaper where an

advert may have been placed. Local residents impacted by the plans have not had letters. I feel this is a failed process. This can easily be construed as negligence on the Council's behalf who has failed on the most basic of levels to communicate a plan to adjacent residents who will have opinions they have the right to air and have professionally considered or answered accordingly. This whilst I would hope not to be true, could give the impression the council wishes to quickly 'sneak' this past the public not giving sufficient time to object to a flawed, ill conceived and illegal development plan. As such, before this process is concluded, I will require the council to demonstrate to me exactly what appropriate measures/considered steps they have taken to inform local residents in a timely manner.

Suggested Modifications:

Remove site LP1602 from the development plan with immediate effect.

Comments:

Additional Evidence Link:

Comment ID **HRU1562**

Site ref (if applicable): **LP1602**

Person ID: **1244025**

Name: **Mrs Ruth Osborne**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I'm not an expert but in my view the proposal can't be compliant as: The site is and always has been Green Belt. The Greenbelt boundary can't just be changed to allow this inappropriate site into the plan The Greenfield badging is wrong. Greenfield sites have not been built on and this site has an existing stables on it. The site is in a special landscape area. The site was included in the initial plan and removed, presumably on sound grounds These points indicate that inclusion of the site in the plan is not compliant/legal

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

Sound Reason:

Its Greenbelt land and all previous planning applications have been rejected. The planning inspector called out the harm that would have been caused by converting one stables on the land when rejecting the last appeal. How can 24 houses be OK if 1 conversion is not? The site is small and I can't imagine how 24 houses could be put on the site. The density would be high and allow little room for parking, pavements and gardens, etc. The site sits on top of a hill so building above the height of the existing stables would be unacceptable to avoid 'skyline development issues. How could development of 24 houses take place without building upwards and being detrimental to the skyline and the visual amenity of the village? The access to and fro Jackson Lane is poor and the junction with Stainland road is an accident blackspot. The lane is narrow without proper pavements. It's simply not designed for the level of traffic 24 houses would bring Local infrastructure is already over stretched. There is just one shop in the village, the doctors surgery and school is oversubscribed, there is no dentist. Public transport is poor with infrequent bus services which continue to be cut, making it difficult for residents and schoolchildren to make simple, single journeys at a fair cost. There is no employment within the village so this housing would simply be commuter housing likely to support jobs in Leeds or Manchester, so would not contribute to the local

economy. The site is a wildlife area supporting biodiversity. We hear owls at night and see bats flying around the stables at dusk. The plan does not demonstrate the exceptional circumstances required to change the greenbelt or to build on it. This site was removed from the last iteration of the plan. There was good reason for this so it can't just be added back in overriding the section to remove it. Inclusion appears to contravene the councils own and national policies.

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

Duty to Co-operate Reason:

I'm unclear just what this covers. However, it if covers the need to talk to other authorities and organizations to ensure the plan is sound for now and the future. Given the lack of local infrastructure and no plans to resolve this locally, with just a plan to put 24 houses into an unsuitable protected site, then I don't see how this duty can have been met.

Suggested Modifications:

Removing this site, LP1602, from the local plan is needed to improve the plan

Comments:

Additional Evidence Link:

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Comment ID **HRU19**

Site ref (if applicable):

Person ID: **1130501**

Name: **Mrs Heather Lee**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The plot states as greenfield when in fact it is green belt which can't be built on.

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

Sound Reason:

greenbelt should remain greenbelt. All government departments are banging on about saving the environment but what they are planning here is destroying the environment. to put housing on this plot would be a traffic hazard, due to access to and from it. The lane is only wide enough for single file traffic. The local school can't cope with any more pupils.

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 **HRU2062**

Site ref (if applicable): **LP1602**

Person ID: **1246735**

Name: **Mark Mullany**

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 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. Barkisland Cross, Jackson Lane, Barkisland - this Green Belt site provides valuable wildlife habitat, distinctive village character visual amenity/recreational value on Jackson Lane away from busy main road where traffic issues including road safety will be exacerbated following 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 **HRU2296**

Site ref (if applicable): **LP1602**

Person ID: **1246983**

Name: **CLlr Rob Holden**

Organisation: **Calderdale Borough 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:

I feel that I must strongly oppose the inclusion of this site for the following reasons: The inclusion of this site would lead to inappropriate development in the Green Belt; The NPPF states that -“the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open ”'. "The inclusion of this site would be in direct contradiction of these aims. The effect of the proposal on the visual amenity of the Green Belt and the character and appearance of the surrounding area One of the five purposes of including land in the Green Belt is to assist in safeguarding the countryside from encroachment. While there is other residential development in the surrounding area, the introduction of a large development here would result in encroachment of residential development into the countryside. Although there is an existing building here it is a simple timber stable building that is associated with the use of the adjacent land. This proposal would cause harm to the purposes of including land in the Green Belt. Although there has been existing traffic to and from the current stables on this site this proposal would be likely to result in a huge increase in the number of vehicles being parked adjacent to the site for much longer periods. Given a proposed development of 24 houses this would affect openness to a huge degree. This large reduction in openness would cause harm to the Green Belt and undermine the policies that seek to protect it. Paragraph 55 of the Framework advises that the creation of isolated new homes in the countryside should be avoided unless there are special circumstances such as where the development would re-use redundant or disused buildings and lead to an enhancement of the immediate setting. Paragraph 81 says that 'local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to"'.retain and enhance visual amenity, the potential to place a development of upto 24 homes on this site would contradict both of these points of advice. The existing 'U' shaped stable building is set well back from Jackson Lane from where it is accessed. To the front and side of the site are open fields. On the opposite side of Jackson Lane there are a number of residential properties which form part of the edge of the hamlet of Barkisland. The site is physically separated from these properties by Jackson Lane and as such any development on this site would constitute encroachment upon the greenbelt. To the west of the appeal site there is a small cluster of dwellings at a much lower level than the appeal site. In summary the site is sat on its own, isolated from the other residential development nearby. Moreover it currently appears as a simple timber stable which fits into its semi-rural setting whereas a large development would not.. During the evening and early on a morning when the lights would be on throughout any potential development the light spill from the glazed areas would make it appear unduly prominent and obtrusive in this countryside location. For these reasons the inclusion of this site would result in significant harm to the visual amenity of the Green Belt and have a significant adverse impact on the character and appearance of the open countryside. For the above reasons I would strongly ask that this site is excluded from the final plan.

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 **HRU2302**

Site ref (if applicable):

Person ID: **1246988** Name: **Mr & Mrs P & M Thompson** 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/5635667>

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Comment ID **HRU2337**

Site ref (if applicable):

Person ID: **1247035** 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/5636977>

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Comment ID **HRU25**

Site ref (if applicable): **LP1602**

Person ID: **1118212**

Name: **Mr Martin Wideman**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

This site is described as 'greenfield' when it is actually green belt land.

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

Sound Reason:

This site applied for planning permission to convert the existing stable into residential property in the recent past. This was denied permission, yet suddenly, it is appropriate to build 24 properties on the land! Access and egress to this site is hardly ideal and will present serious risk of accident and injury with the increase in vehicular and pedestrian number, if this plan is allowed to proceed. Recent experiences of car accidents around the village clearly demonstrates that we have probably surpassed manageable numbers. The negative visual impact on this village can never be recovered. Over the last 40-50 years, Barkisland has done more than its fair share in contributing to the housing requirements of Calderdale and this has impacted to the maximum on the local amenities such as school, healthcare, not to mention the demands on hidden services such as sewerage, water supplies etc. On this basis, to place further demands would be detrimental to the locality.

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 **HRU359**

Site ref (if applicable):

Person ID: **1129323**

Name: **Mr Philip Osborne**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Objection to inclusion of LP1602 in the local plan. This is Green Belt land not greenfield land as noted in the

documents. The incorrect land type greenfield designation gives the impression that there is a lower test for allowing development on the land. This area has always been in the Green Belt and remain so as demonstrated on the councils own records Any proposal to develop this land need to reflect principles of development within the Green Belt. There have been numerous attempts to obtain permission to develop this land. All of which have correctly been rejected by the council. This policy was reinforced by the planning inspectorate in its rejection of a planning appeal APP/A4710/A/14/2228437. I have summarized key points from the inspector's comments The substantial weight that must be attributed to the harm arising from inappropriate development, harm to the openness of the Green Belt, harm resulting from conflict with purposes of including land in the Green Belt, significant harm to the visual amenity of the Green Belt. The proposal would also have a significant adverse impact on the character and appearance of the surrounding area. The proposal would conflict with UDP policy 4 and the advice in the Framework in so far as it seeks to protect Green Belt land and restrict the creation of isolated new homes in the countryside. Very special circumstances to justify the proposal do not exist and therefore for the reasons given above and having regard to all other matters raised, I conclude that the appeal should be dismissed.' It is unrealistic to conclude that a proposal to put 24 houses on a site where the planning inspectorate ruled that one stable conversion was inappropriate, and did not constitute very special circumstances, could be classed as such. The current National Planning Policy Framework, section 13 focuses on protecting the Green Belt. The Government attaches great importance to Green Belts, noting 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. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, The local plan does not include any evidence to demonstrate exceptional circumstances required for compliance with the requirements for altering the Green Belt boundaries, including those in Chapter 11 Achieving appropriate densities, e.g. the availability and capacity of infrastructure and services, scope to promote sustainable travel modes that limit future car use, desirability of maintaining an area's prevailing character and setting or of promoting regeneration and change, the importance of securing well-designed, attractive and healthy places. Notwithstanding the above, Esther McVey, the current Housing Minister's own policy on Green Belt land notes that -"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" This proposal is contrary to the Minister's stated policy. LP1602 is also in a Special Landscape Area as reflected in the councils own records. Policy NE 12 notes development within the Special Landscape Area which would adversely affect landscape quality will not be permitted. Special attention should be paid to conserving and enhancing the visual quality and minimising the environmental impact of development in the area through detailed consideration of the siting, materials and design of the new development. The proposal is non-compliant. Putting an estate of 24 houses on Green Belt fields cannot be classed as anything other than detrimental to the site.

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

Sound Reason:

LP1602 is a small Green Belt plot, in a Special Landscape Area comprising a riding stables and grazing on a hill overlooked by existing houses. It is a quiet oasis full of wildlife, e.g. where bats are regularly seen flying around the stables at dusk in season. The site is an essential part of the village and it's no wonder Jackson Lane is favoured by walkers. The plan does not demonstrate compliance with the requirements in Chapter 13, e.g. to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual

amenity and biodiversity. The proposal does exactly the opposite. The proposal looks to cram 24 houses onto this site. An alarmingly high density. This would be a mini commuter estate, with a low estimate of an additional 35 cars. The estate would be a skyline development and the current bio diverse carbon store would be eliminated. The estate would also bring significant light pollution from the estate and the traffic it will generate. These factors demonstrate a few of the material impacts of the proposal, the destruction of valuable Greenbelt, fundamentally demeaning the visual amenity and character of the area. The local plan does not demonstrate that exceptional circumstances have been identified to allow development on this site. Harm to the Green Belt is not outweighed by other considerations. It is unrealistic to conclude that a proposal to put 24 houses on a site where the planning inspectorate ruled that one stable conversion was inappropriate and did not constitute very special circumstances could be classed as such. The plan does not comply with the sustainable development economic, social and environmental requirements of the NPPF Chapter 2. Local services, public transport and infrastructure are already inadequate, e.g. Barkisland has only one shop and an oversubscribed school, the nearest doctors' surgery is in Ripponden which is oversubscribed with new patients recently arrived from a closed practice in Sowerby Bridge, drainage is inadequate and drains in the village regularly overflow. There is no local employment base for new residents to join. Other factors are noted above, e.g. biodiversity. Given its hillside placement, the road junctions at either end of Jackson Lane are dangerous. The council will find evidence of recent accidents, e.g. at the junction with Stainland Road. The substantial increase in traffic that this residential development would bring is a material concern. This land was inappropriately included within the previous draft local plan. Following review and challenge it was removed. Nothing fundamental has changed since then. I submit that the Planning Inspectorate's challenge to the council in July 2019 to include more suitable sites means the council is charged with finding new suitable sites. It does not imply that sites previously rejected could simply be put back into the plan. The weight of factors, including noncompliance with the NPPF and Calderdale's own policies mitigating against inclusion of LP1602 in the plan are compelling and demonstrate the development would be inappropriate and including it in the local plan is unsound.

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

Duty to Co-operate Reason:

I understand requirements for duty to cooperate were withdrawn in September 2018. In respect of this previous duty / the new Statement of Common Ground, I feel the plan fails to demonstrate that effective consultation has taken place with other public bodies to meet / address the strategic issues this proposal generates. For example there is a failure to address issues around: Lack of infrastructure, roads, drains, schools, medical provision, shops, parks. The plan will simply add further to the already inadequate services. Creation of a commuter estate, creating additional car journeys. This is exacerbated by the lack of local employment. Impaction on biodiversity Negative impact on visual amenity and the built environment. This supports the view that the plan is unsound and LP1602 should be withdrawn from the plan.

Suggested Modifications:

Remove LP1602 from the plan

Comments:

Additional Evidence Link:

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Comment ID **HRU438**

Site ref (if applicable): **LP1602**

Person ID: **1121248**

Name: **Mrs Lesley Thornton**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I have absolutely no idea whether or not it is compliant and many local people won't unless you have previous planning knowledge

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

Sound Reason:

Conflicts with other Council plans This land is still designated as greenbelt NOT greenfield and the council states a "need to protect greenbelt" and "conserve and enhance the natural environment" so this site needs to be removed off the housing development list. The plan to provide housing on this greenbelt will be on the skyline and end up as a beacon of light pollution during the hours of darkness for all to see over a few miles radius including the M62. A previous planning application for just 1 dwelling was turned down at appeal by the secretary of state for exactly this reason so how does 24 houses override the decision relating to unacceptable light pollution? Building 24 houses will create at least an extra 48 cars (2 per household) and increase pollution. Very, very few individuals would wish to cycle to work, due not only to the large distances between the village and places of employment, but also the negotiation of hills in both directions. Our adverse windy weather in the autumnal , winter and spring months won't help commuter cyclists either. Hence the need for cars to commute to work or to the 'planned' recreation of Elland railway station, whenever that happens. The new housing is supposedly to support the economic growth and ensuing jobs but there are no jobs anywhere near the village. The nearest towns of Halifax and Huddersfield are 4.2 and 6.1 miles away respectively. With many foreign nationals returning home from our area, the need for increased housing therefore decreases. This additional housing site has close links to the M62 and as such will only serve to support easy access for those working in the cities of Manchester, Leeds and Bradford and thereby not contributing to the Calderdale economy. In essence, we will be providing cities with their housing to the detriment of our village. Jackson Lane is narrow, and in places, only 1 car/tractor width. Farm vehicles are constantly using this lane which is understandable due to the rural nature of the village. The exit from the lane onto Stainland Road can only accommodate 1 car and the exit is also blind. 1 car exiting and 1 car entering at the same time is already a recipe for disaster as many a time the car on Stainland Road has to back up into the oncoming traffic as there exit from Jackson Lane is steep and often there are 2 cars behind each other. Due to the blind exit there have been many road traffic collisions with cars travelling up Ripponden bank. Yes speed is an issue, but so is the plethora of cars using Barkisland as a rat run at all times of the day but specifically at peak times. The exit from Jackson Lane onto Greetland Road is semi blind especially in regard to the summit of Ripponden Bank. There has already been one fatality at this junction and only time and more housing stock will increase the risk even more. As it is, villagers do not dare to step out onto either Greetland or Stainland Road from Jackson Lane without looking both ways multiple times and making a run for it due to the very short distance to the summit. There are many events such as cycling, running and hiking clubs who use Jackson Lane. How will their safety and those of the villagers be ensured? The frequency in which the M62 is closed and traffic is diverted through Ripponden and upward through Barkisland keeps increasing. This year not only was Stainland and Greetland Road at a standstill for a few hours but Jackson Lane became a lorry park in essence, as the truck drivers try to find alternative routes but cannot turn left or right onto Stainland Road due to the narrow exit and no space for the trucks to turn into the main road. The school cannot expand and the Doctors surgery will be unable to cope, as this would potentially mean at least 96 more patients - 4 extra people per house. This housing does not preserve the natural environment or enhance the visual

amenity of the land. It will NOT reduce pollution levels or CO2 emissions. The land as it is, contributes positively to the rural character of the village. It is time for the Council to adhere to their intentions to work with landowners to improve and enhance their land for biodiversity as stated in their recent climate emergency survey and leave the greenbelt without housing. This additional site needs removing from the list permanently and stop it from sneaking back on again.

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

Duty to Co-operate Reason:

Actually I have no idea and would expect it have been achieved; however there seems to be an intention to smokescreen applications as sites are added, removed and added again which does not bode well relating to trust in our council.

Suggested Modifications:

Unless you work in planning, individuals home owners are unaware of the laws.

Comments:

Additional Evidence Link:

Comment ID **HRU518**

Site ref (if applicable): **LP1602**

Person ID: **1128517**

Name: **Mrs Alison Gaukrodger**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I am not sure if it is illegal but it is certainly very misleading to classify this land as Greenfield in the local plan when it is Green Belt land. I understand they are two different classifications. Calderdale Council in its own Green Belt review classed this site as Most Sensitive Green Belt, meeting 3-5 of the identified purposes and within the Special Landscape Area making it a highly important piece of land, which Calderdale Council has safeguarded for many years. The plan does not comply with the National Planning Policy Framework regarding the protection of the Green Belt. The very purpose of the Green Belt is to prevent urban sprawl. The Local Plan has not identified exceptional circumstances to justify a change in the boundary to allow housing to be built on site LP1602. The council's need to meet a housing target does not constitute exceptional circumstances. Nor does the plan comply with NPPF requirements for altering Green Belt boundaries such as infrastructure and sustainable travel. Please refer to comments below.

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

Sound Reason:

Instead of finding new sites and exploring further Brownfield opportunities, Calderdale Council has taken the easy option to put previously filtered out sites back into the Local Plan in an attempt to satisfy the Inspector's request to find additional housing sites to meet the anticipated employment growth in Calderdale. It is most unfair of the Council to put forward sites which were previously assessed as unsuitable for sound reasons. The council may have a housing target to meet but it also has a responsibility

for the health and well being of existing residents and adding this site back into the Local Plan has caused undue stress to residents once again. I contend that actually it is not that the housing figures are too low but rather the prediction for employment growth is too high, and certainly this must be revisited now given that the prediction was based on pre-Brexit data. I also assert that not one of the new residents on this housing site will be employed in Barkisland itself and given the proximity to the motorway network they will likely not even work in Calderdale. To align with environmental policy and sustainable development, if additional housing is necessary it must be situated in close proximity to places of employment i.e. on Brownfield sites, of which there are many in Calderdale. One example is Horsfall Mill at West Vale, which is ideal for sustainable housing development being perfectly located within easy walking distance of services, amenities and a very good public bus service. Site LP1602 is Most Sensitive Green Belt land which has been safeguarded by Calderdale Council for many years. The evidence is there in all the planning applications and appeals relating to the stables going back to at least 1979. All were refused because it is Green Belt and within a Special Landscape Area and there were no very special circumstances to justify development. The appeal to planning application 14/00632/CON was dismissed by the Planning Inspectorate due to the harm it would cause to the Green Belt, the significant harm to the visual amenity, the adverse impact on the character and appearance of the surrounding area and that very special circumstances did not exist. That proposal was for one dwelling only. 24 would cause even greater, irreparable harm to the Green Belt and being skyline development would destroy the visual amenity of the area completely. It would be an unsightly blot on this Special Landscape Area which would be seen from miles around. The Council's own site assessment report for LP1602 agrees it will cause significant harm to the landscape (red traffic light score). This significant harm outweighs by far the insignificant impact that 24 houses will have on the overall housing target. In line with the Council and Planning Inspector's previous refusals, Site LP1602 was filtered out of the draft plan because -"the land is most sensitive Green Belt and within a Special Landscape Area. Having regard to the Council's housing need, the Local Plan's spatial strategy, the supply of more suitable and available sites elsewhere and the need to protect the Green Belt as far as possible, this site has been filtered" The Council's own assessment of the site shows a red traffic light score for efficient use of land. It is inconceivable that the council can now suggest their preferred use of this Green Belt land is a New Housing Site. The Local Plan is unsound as it is contrary to NPPF paragraph 117 which states that planning policies should promote 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. Paragraph 118 goes on to state that planning policies should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs. Site LP1602 would not promote an effective use of land while safeguarding and improving the environment. It will only cause harm to that environment from the 35 vehicles (minimum) coming and going from the site and to the wildlife for example bats can be seen in the summer months. Sparrow hawks, owls and foxes are also regularly seen. It will not promote safe and healthy living conditions, but remove them completely for existing residents. There will be artificial light pollution from houses and from vehicles at night (which will shine into existing houses on Jackson Lane). This was another reason the Planning Inspector dismissed the 2014 appeal. This site provides an open space which is enjoyed by so many local residents recreationally. Many walkers, joggers, cyclists and equestrians use Jackson Lane every single day. It gives them a reprieve from the very busy main roads at either end and enables them to safely take in the stunning view across the valley. This visual amenity gives the village its rural identity. To remove it will spoil it for all. This is an exposed site where extreme weather conditions are frequently experienced, especially strong westerly winds. The force of nature in this location must not be underestimated. It will make for dangerous living conditions to the new residents and to existing residents to the east of the site on Jackson Lane who will be 'down wind' of domestic paraphernalia such as garbage and recycling blown from these houses. Jackson Lane itself will also be frequently littered. The construction process will be dangerous and it will without doubt experience delays, prolonging the disruption to the lives of existing residents. In terms of paragraph 118, the site is not

and has never been previously developed land. Its use has always been equestrian / agricultural. Wooden stables do not constitute previous development. The Local Plan is unsound therefore as it does not comply with NPPF paragraphs 117 and 118, undermining the Council's conclusion that it is suitable for housing. The plan does not comply with the sustainable development requirements set out in the NPPF. The infrastructure required to support site LP1602 or any other development in Barkisland is simply not there, and there seems to be no plan to address this. Local services for existing Barkisland residents are already well overstretched. There is one small shop which has no scope to expand. GP surgeries and dentists cannot cope now let alone with the demand from further housing developments in this area. It is highly unlikely that any places will be available at Barkisland School for any children living on this site and all other primary schools in the Ryburn Valley area are heavily oversubscribed and have been year after year. They are all Church of England schools with one exception at Ripponden and they cannot be forced to expand any further, meaning any new children in this village will have to travel long distances to attend school. The high schools serving this area are also oversubscribed. Many local children cannot secure places on the school buses serving those high schools therefore parents have to drive their children to school. The public bus service is very limited and under constant threat of the axe due to lack of use and it is too far to walk to the nearest train station. The only option for people living in Barkisland to get to their places of employment is to use their vehicles. The extra 35 (minimum) cars from 24 houses will have a significant impact on the local roads which are already very busy and they are becoming increasingly dangerous. The junctions at both ends of Jackson Lane are concealed from the speeding traffic on the main roads. There are frequent accidents with the number rising in recent months as a direct result of increased traffic. There will inevitably be more with further increases to local traffic. There are also frequent motorway closures which bring the village to a standstill with traffic backing up from Ripponden on both main roads, making it impossible to enter or exit Jackson Lane. The number of vehicles that will come with this development will only exasperate the problem. There is no suitable access to this development from Jackson Lane. The lane is too narrow to support the number of vehicles which will come with this development. It is only wide enough for one car in most places, especially so at the Stainland Road junction. Widening the lane would involve major road works which will be highly disruptive to the lives of existing residents causing them further undue stress. Evidently, this cannot be considered to be sustainable development. Calderdale Council states in its Green Belt Review final report 2017, paragraph 5.21 that Barkisland is a 'stand alone' settlement and draws attention to its isolation and lack of services. In my opinion therefore this plan is wholly unsound. Given the non-compliance with the NPPF, the Council's own mitigating factors for filtering this site out of the draft plan (nothing has changed since) and the fact there are no exceptional circumstances to justify the release of this most sensitive Green Belt site which has been fiercely protected by Calderdale Council for decades, I respectfully request the Planning Inspector to remove LP1602 from the Local Plan.

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

Duty to Co-operate Reason:

I believe Calderdale Council have not been open and transparent with residents with regard to the revised Local Plan. They have failed to inform residents in an appropriate manner. Many residents do not use social media and many no longer read the weekly Halifax Courier newspaper. Many people are therefore not aware that previously filtered sites have been added back into the plan. The Council has made the process to object very difficult in the hope that many won't bother, and those who can crack the system are then baffled by questions regarding Legal Compliance and Duty To Co-Operate.

Suggested Modifications:

Remove Green Belt site LP1602 from the plan. Exceptional Circumstances for its release do not exist.

Comments:

Additional Evidence Link:

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Comment ID **HRU533**

Site ref (if applicable): **LP1602**

Person ID: **1242879**

Name: **Mrs Gillian Chambers**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

This plot of land is a Greenbelt area, and as such should be protected from being developed.

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

Sound Reason:

There are serious safety implications should this area be developed. Jackson Lane is extremely narrow and barely passable for 2 cars. At the junction with Stainland Road it is only possible for 1 car to exit/access at the same time, resulting in the need for 1 car to reverse clear. Dangerous. Very poor visibility as this junction is only a matter of yards from the brow of the hill. At the junction with Greetland Road again sight lines are restricted when exiting due to the bend and in addition a danger from the speed of the oncoming traffic. Both junctions would be an accident waiting to happen. With the building of 24 houses there is the potential for at least an additional 48 vehicles. With developers intent on building properties with very little parking space it is likely that there would be an overspill of vehicles into Jackson Lane, especially when these properties receive visitors, and thereby becoming a 'car park'. There is already pressure of traffic in the area and this proposed development will only make matters worse. At school times the parking on Stainland Road and volume of traffic is already unacceptable.

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

Duty to Co-operate Reason:

I have concerns about the way the local plan has been conducted and this area of land should be removed from consideration.

Suggested Modifications:

Remove from the plan, use brownfield sites.

Comments:

Additional Evidence Link:

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Comment ID **HRU568**

Site ref (if applicable): **LP1602**

Person ID: **1242983**

Name: **Mrs Lesley Ashworth**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

As I have insufficient legal or planning background , I am unable to comment fully on the status of legal compliance. However, the fact that the area is designated Green Belt and not greenfield raises questions in my mind.

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

Sound Reason:

As the site is designated 'Green Belt' the duty to preserve such areas should be upheld. In an age where green spaces are constantly eroded, the preservation of local flora and fauna are essential and should be a high priority for the local authority. I can find no reference in the application to any 'exceptional circumstances' under which the designation of this area could be changed to allow this planning application to progress. I understand that a previous application for the existing stables on the site to be converted to a single dwelling was rejected. Therefore it is impossible to comprehend that a proposal to build 24 dwellings on this single site should now be under consideration. Existing dwellings in the area are well-spaced and built at a reasonable level. One can only speculate that in order to fit 24 dwellings on this site, they are likely to be town houses built on three levels. Jackson Lane is a narrow road and has no footpath. There is a already requirement for use by large, wide local farm vehicles including tractors and trailers, making passing on the lane very difficult at times. The lane is frequently used by walkers, families, including mothers with young children and buggies, horses and riders. The visibility at the junction with Stainland Road is very poor in terms of oncoming traffic and already presents a risk to pedestrians and drivers. Public transport in the area is under-developed. This forces local residents to rely on transport by car to get them to and from their place of work, especially to locations such as Manchester or Leeds. The addition of 24 dwellings has the potential to increase traffic by upwards of 40 vehicles, all requiring access onto Jackson Lane and the two adjacent roads. Plans for a much needed traffic -calming scheme for the adjoining section of Stainland Road is testimony to the urgent need to reduce the volume of traffic and speed around the Barkisland School area, which is very close to the proposed site. Increasingly, the frequent M62 closures already create excessive traffic in the Barkisland area, which is a quiet residential area. The addition of 40+ vehicles permanently located within this small area would exacerbate existing traffic problems and increase the risk to pedestrians using Jackson Lane. Local services including school and health services are already working at full capacity and the addition of a further 24 dwellings and associated residents/families would create unnecessary additional pressure on these services.

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

Duty to Co-operate Reason:

Again, I have no legal or planning background or experience whereby I could make a judgement on full compliance. However, I do have a concern that local residents should be made aware of applications such as this in a more open and transparent manner. My limited understanding is that the 'Duty to Co-operate' relates to the local authority's duty to co-operate with other bodies responsible for policy making and decision making. I should like to see this duty extended to co-operation with local residents by ensuring they are made more fully aware of the detail of any planning applications within their immediate area.

Suggested Modifications:

Unable to comment

Comments:

Additional Evidence Link:

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Comment ID **HRU592**

Site ref (if applicable): **LP1602**

Person ID: **1243008**

Name: **Mr John Hoyle**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I don't believe classing the land as Greenbelt is correct it's always been classified as Green Belt .

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

Sound Reason:

Barkisland is a small village with limited infrastructure which does not support an additional 24 houses and the additional cars that will bring. Roads into the surrounding villages are already extremely busy during the morning and evening commutes and additional cars will only increase the pressure on the roads. The local school is at capacity and has been extended previously so would struggle to accommodate additional children. Jackson Lane is narrow and has poor visibility with the adjoining roads which leads to accidents. In places there are no pavements making it dangerous for pedestrians and an increase in traffic will make this worse. Previous planning permission for a lot less houses was rejected so what has changed to now allow 24 houses?

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 **HRU615**

Site ref (if applicable): **LP1602**

Person ID: **1123624**

Name: **Mr Russell C Graydon**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

No has been bullet marked as there is no provision for don't know!! Technicalities in terminology make it difficult for the layman to understand.

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

Sound Reason:

Previous concerns listed as follows cover my concerns at this reintroduction of the land into the Local Plan:- Proposed outcome of the site assessment Do you agree with the proposed outcome of the site assessment? No Site assessments Flooding Highways Open Space Other factors Green Belt Flooding LP 1024 - Stainland Road comments state that the 'development would increase surface water flooding'. If this statement is correct then the same should apply to the land at Jackson Lane. Any water run off would have a detrimental effect on areas to all sides of the site in question. Highways 'Major' roadworks would be required to make Jackson Lane viable for the potential of an additional 48 vehicles over and above the 32 already in existence from Jackson Meadows & Jackson Lane. Indeed to make any road improvement in keeping with current rural aspects some land would have to be taken off the proposed development site. This proposal would potentially more than double the existing number of vehicles. Egress at each end of Jackson Lane is currently hazardous. At the Stainland Road end no amount of visibility line improvements can compensate for the dangers of extremely fast moving traffic from Ripponden Bank coming over the brow of the hill at excessive speeds, and at the Rochdale Road end egress is currently hazardous due to restricted sight-lines and fast moving traffic approaching from both directions. Also access into Jackson Lane on Rochdale Road coming from Ripponden is hazardous due to the speed of potential oncoming traffic, which approaches on a blind bend. This situation can only get worse with extra dwellings accessing to and from Jackson Lane. These road junctions at each end of Jackson Lane have, over the years been the site of road accidents. Open Space The 'no loss or impact' statement is incorrect. This land is designated SLA. LP1024 - Stainland Road & LP1027 - North Royd are considered to be potential sites for refusal due to them being in SLA - surely then this applies to the land at Jackson Lane which is also designated SLA. This land is on the skyline and, regardless of the view on approach, any development, be it single or double storey would have a detrimental impact on the area in question. Other Factors The density of housing proposed is far too high taking into account the potential of loss due to essential roadworks, and also the acute narrowing shape of certain aspects of the land in question. Contradictory statements appear on the website - in clarification the land usage is stables & grazing NOT agriculture. Indeed the Overall Assessment Summary clearly states the land as being 'in use as stables / paddocks'. Current infrastructure is inadequate to accommodate additional housing i.e school, bus services and shops etc. For many years now Town Planning applications for new build development and change of use renovations on the stables site have been refused. Only recently has Town Planning succumbed to Government legislation on land incorrectly considered by some to conform to agricultural use. If such relatively small development proposals are considered unacceptable surely the proposal to allow 24 dwellings to be built on this land is also unacceptable. If small development areas are gradually taken from green belt areas on the edge of rural villages, then eventually these villages will lose their identity, and the countryside will disappear for future generations. Green Belt The Site Summary - Overall Assessment Summary clearly states that this is a Greenfield, Green Belt site in a Special Landscape Area. Also that 'Housing Services have concerns that this would not be a good site to allocate due to the limited public transport & not suitable for affordable housing'. How then can consideration of development of this land be justified? This land is currently Green Belt and should remain so. It is unreasonable to simply move the Green Belt boundary on this land just to accommodate housing development which could likely as not be achieved on brownfield sites elsewhere. If this were to be approved it would cause development density problems of great magnitude on this small, isolated yet significant piece of green belt & SLA land Alternative proposed use for this site. Open Space and Stables Please give your reason for alternative preferred use. All reasons as previously recorded above. The land should remain in its current aspect as open space for stables and paddocks.

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

Duty to Co-operate Reason:

Lack of updates on the situation which has resulted in this pocket of land being reintroduced as potential housing development. Local residents were not made aware of the change in proposals and recent documents prove confusing. This parcel of land, LP1602 on the 'green belt' plan at CMBC, shows as part of - "most sensitive greenbelt parcels" If this is the case and the previous consideration to exclude it from the Local Plan was correct, then why has it been reintroduced as a means of increasing housing capacity in Calderdale? This is unreasonable and unnecessary. This parcel of land should be excluded from the Local Plan and a more realistic and practical solution should be found. The repositioning of the greenbelt boundary to increase housing capacity by 24 units is an unreasonable and unacceptable adjustment made without reasonable cooperation, and should be rescinded. The Local Plan Publication Draft 2018 shows the land as greenbelt. Local Plan Potential Sites (Archived) 2020 does NOT include the land in question. Local Plan Initial Draft 2020 shows the curtilage of the greenbelt to have been moved so as to include the land in question.

Suggested Modifications:

Remove this pocket of land from the Local Plan - the previous decision to exclude this land should prevail.

Comments:

Additional Evidence Link:

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Comment ID **HRU616**

Site ref (if applicable): **LP1602**

Person ID: **1129604**

Name: **Mrs Elaine Graydon**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I've put 'No' as there is no provision for 'don't know'. This site has been excluded from the Local Plan at a previous consultation and should not have been reinstated.

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

Sound Reason:

The comments below are those submitted in my original objection prior to the removal of the land from the Local Plan which are still salient Proposed outcome of the site assessment Do you agree with the proposed outcome of the site assessment? No Site assessments Flooding Highways Open Space Other factors Green Belt Flooding Surely the potential increase surface water flooding is no different to that on LP1024 - Stainland Road. Jackson lane, Jackson Meadows & the adjacent cottages to the West of this land would be affected. Highways This proposal would more than double traffic on Jackson Lane & increase the risk of potential serious accidents - which have already occurred - at each end of Jackson Lane due to the high speed of approaching traffic & poor sight lines. The road is not wide enough to accommodate high volumes of traffic which would occur were the land to be used to build 24 new dwellings. Open Space The use of brownfield sites, of which there must be many in Calderdale, should be considered before impinging on this green belt open space. This land is currently designated SLA and should remain so. Any development on this land would also have an adverse impact on the skyline. Other Factors Previous planning applications over many years on this green belt land have been considered inappropriate and

thus refused. This situation should not change. The current use of the land is stables & paddocks and should continue as such. Current local school capacity is close to or at maximum, and as this is an independent church school the local Authority presumably cannot enforce any increase in capacity. The potential of a further 48 children would have a detrimental impact on the provision of schooling facilities. Bus services between Barkisland & Halifax are minimal, and currently there is the possibility that insufficient use might result in a reduction of the service currently provided. This would increase the need for private transport and impinge detrimentally on the traffic density on Jackson Lane. Local facilities in Barkisland are currently sufficient to it's needs, but any further development in this village would alter the whole concept of village life, and therefore this proposed development should be removed from the schedule so as to maintain Barkisland as a village community environment. Green Belt The Site Summary on the Site Assessment Report suggests that it is unreasonable to remove land from the green belt just to increase housing capacity. Our green belt should be protected, and it is unreasonable to simply move this existing green belt boundary just to add an additional 24 dwellings the like of which would have, for many and varied reasons, a negative impact on the village of Barkisland, and in particular Jackson Lane. Alternative proposed use for this site. Open Space and Stables Please give your reason for alternative preferred use. All concerns as listed above are relevant.

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

Duty to Co-operate Reason:

Lack of information for local residents following the decision to reinstate this pocket of land into the Local Plan. Greenbelt, Greenfield and SLA land is of great importance to the community, and therefore should not be impinged upon to develop small pockets of housing when many brownfield alternatives must be available. LP1602 on the 'green belt plan' at Calderdale MBC clearly states that the land in question is a part of -"most sensitive greenbelt parcels" This being the case then this land should not have been reconsidered once it had been rejected at the previous consultation. The Local Plan Publication Draft 2018 shows the land as greenbelt. Local Plan Potential Sites (Archived) 2020 does NOT include the land in question. Local Plan Initial Draft 2020 shows the curtilage of the greenbelt to have been moved so as to include the land in question. This realignment of the greenbelt to increase housing space by 24 units is an unreasonable and unacceptable -"moving of the goalposts" and should be rescinded.

Suggested Modifications:

LP1602 should be removed from the Local Plan. The previous decision to exclude the land from the Local Plan should be adhered to - relocation of the extremities of the greenbelt to reallocate this land for housing is unacceptable.

Comments:

Additional Evidence Link:

Comment ID **HRU626**

Site ref (if applicable): **LP1602**

Person ID: **954070**

Name: **Mr Peter Cawdron**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

As highlighted in other comments, I understand this land to be designated as green belt and as such should be protected from new development of this type.

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

Sound Reason:

I responded to a previous consultation on developing this site, as follows: "The proposed site will result in significant increased traffic in the centre of Barkisland, where traffic, particularly street parking, already represents a problem both morning and afternoon around the school. In addition Barkisland is poorly served by public transport, so a major new housing development will increase traffic both in Ripponden and in West Vale - where there is already a major problem notably at rush hour". I consider these comments still hold good - all the more so as they related to a smaller proposed development than is now the case. In addition I would highlight that our local infrastructure (schools, doctors, dentists) is under significant pressure: without a clear commitment and plan to address the infrastructure issue as well as the very real concerns around traffic volumes, I cannot see how this proposal could possibly be approved.

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

Duty to Co-operate Reason:

The explanation around this section is inadequate and does not allow someone who is not a planning expert to make an informed judgement. In these circumstances, the onus must surely be on the planning department to make its case, to which we could then respond.

Suggested Modifications:

None

Comments:

Additional Evidence Link:

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Comment ID **HRU630**

Site ref (if applicable): **LP1602**

Person ID: **1243022**

Name: **Mr Tony Evalds**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I do not believe the plan to be legally compliant as in the documents the site is stated as Greenfield when it is in fact Green Belt land and therefore should not be built on.

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

Sound Reason:

There have been numerous applications to develop this land over the years including a change of use of the stables to 1 house and all have been refused as it was in Green Belt within a Special Landscape Area. The plot is a small area with stables and Jackson Lane is a quiet narrow lane used by walkers and horse

riders. Building houses on such a small plot would change this area detrimentally for all who use it and live on it, and put more strain on already inadequate local services. The junction on either end of Jackson Lane are already dangerous and there have been several accidents in recent years.

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

Duty to Co-operate Reason:

No information was given to local residents regarding this site being re-entered into the Local Plan.

Suggested Modifications:

Do not build on Greenbelt Land and remove LP1602 from the plan.

Comments:

Additional Evidence Link:

Comment ID **HRU686**

Site ref (if applicable): **LP1602**

Person ID: **1243121**

Name: **Mr James Beresford**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

This land has historically been designated as green belt. Indeed historically when an application has been made to develop just one property on this land - this was accepted by the council. This land was removed by the council previously from the local plan confirmed by Cllr Holden. This proposal is therefore in breach of section 19 of the NPPF. In particular, the 5 key purposes of 19.2 which are stated as 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; 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. This proposal directly contravenes each of the 5 purposes. This proposal is also in contravention of 19.3 in that the land: to provide opportunities for access to the open countryside for the urban population; to retain attractive landscapes, and enhance landscapes, near to where people live; to improve damaged and derelict land around towns; to secure nature conservation interest; (in this instance bats) to retain land in agricultural, forestry and related uses I would also refer to the other policies contained in NPPF that protects the 'open countryside outside of the Green Belt from inappropriate development and also generally fulfillsthe purposes noted above' Again this proposal breaches the above. This proposed development is harmful to the openness of the greenbelt. Please note that the land is in a Special Landscape Area that will be destroyed by this proposal.

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

Sound Reason:

Positively prepared - this proposed development is not sustainable, there is not the infrastructure in Barkisland to support such a development. Jackson lane is a single track lane with no footpath. It is frequently overwhelmed with traffic (farm traffic and at school times). The junctions with Greetland Road and Stainland Road are dangerous and there are frequent 'near misses' and car accidents. Another 50 cars

on this lane will only make matters worse. Barkisland does not have the infrastructure to support these extra houses. The traffic at key times of the day dominates the village and the speeds that cars travel through the village at other times of the day only make matters worse. At school times, cars are parked up to the junction of Jackson Lane and Stainland Road. Any additional houses would be detrimental and put children's lives at risk. This land was removed from previous plans for being unsuitable and one is surprised to see it being 'sneaked' back in' with no local announcement. Justified - There is significant development in Ripponden planned (at JLA) and planning has already been granted for this. There will be substantially more houses built on that development on brownfield land - further development is not required. The council should look at the land at the former Kebroyd Mill that has been derelict for many years with planning as this land would be better suited for 24 houses rather than the 9 'substantial detached properties as present. Consistent with national policy: please see above with breach of s19 NFPF

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

Duty to Co-operate Reason:

The Council has amended and added this land to the Local Plan that was consulted and voted upon in 2018. By seeking to add land in after this time, council has not co-operated with policies and it duty to the residents of the area.

Suggested Modifications:

Remove LP1602 from the development plan

Comments:

Additional Evidence Link:

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Comment ID **HRU825**

Site ref (if applicable): **LP1602**

Person ID: **1243414**

Name: **Mr Graham Higson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Actually, I have no idea about this.

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

Sound Reason:

Land type For some years I have been under the impression that this land was designated Green Belt, and I feel that describing it in the application as Greenfield is at best an error and, at worst... well, I wouldn't like to say. Location Jackson Lane is single track with no passing places and is unsuitable for coping with the increased traffic flow servicing a housing estate. Safety Visibility at both ends of Jackson Lane is poor for joining Greetland Road and especially Stainland Road, with severe blind spots. Allowing for extra traffic on this road will provide further opportunities for road traffic accidents. Loss of drainage The reduction of natural drainage of .76 hectare would be detrimental to nearby housing, with the potential for flash flooding. In heavy rain we already see drain covers lifting during to the excessive downpours, which will

worsen if natural drainage on the proposed development site is destroyed. Global warming is not going to improve matters. School parking On Pinfold Close we are already inconvenienced at the school closing time due to parents parking at the end of our road whilst showing no consideration for residents or other road users, and also parking along the close, sometimes blocking driveways. The potential for another 48 children whose parents want to accompanying them the odd 300 metres or so from home would very likely further impact the residents of Pinfold Close. School It can't expand any further, meaning that parents will need to find places further afield, with consequential impacts on carbon emissions and congestion ; areas in which we are increasingly being encouraged to reduce.

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

Duty to Co-operate Reason:

I don't think this is still a legal obligation.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU892**

Site ref (if applicable): **LP1602**

Person ID: **1243599**

Name: **Mr Alan Davies**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

This site is in the green belt and a special landscape area. It is not appropriate for housing. It should remain an open landscape area with outstanding views.

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

Sound Reason:

This area is not suitable for large scale housing development. It is not a sustainable location.

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

Duty to Co-operate Reason:

it is not clear what consultation has taken place about the proposal to build 24 houses on a piece of green belt land. This is not an appropriate site for houses.

Suggested Modifications:

Keep this as green belt land without houses.

Comments:

Additional Evidence Link:

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## **Main Issues and Council Response**

### **Legal Compliance**

#### Main Issues:

1. The land is Green Belt no exceptional circumstances have been demonstrated justifying altering the Green Belt boundary. Meeting a housing target does not constitute exceptional circumstances. Does not comply with NPPF policy.
2. Land is described as Greenfield in land type field on site schedule.
3. The land lies within a Special Landscape Area.
4. A previous planning application was refused due to Green Belt, Special Landscape Area and lack of very special circumstances.

#### Council's Response:

1. This issue has been responded to under 'Soundness'.
2. The land type field has been correctly populated as Greenfield as the land type is either Brownfield, Greenfield or Mixed. The borough's Green Belt consists of both Brownfield and Greenfield land.
3. This issue has been responded to under 'Soundness'.
4. This issue has been responded to under 'Soundness'.

### **Test of Soundness**

#### Main Issues:

1. Loss of Green Belt leading to inappropriate development. Lack of exceptional circumstances.
2. Local highway network specifically capacity and road safety.
3. Site access is unsuitable.
4. Infrastructure - Lack of/pressure on existing amenities, services and facilities in the local area, e.g. schools, shops, doctors.
5. Visual impact of development of the site on Barkisland. Density is too high.
6. The land lies within a Special Landscape Area and is a quiet oasis full of wildlife.
7. Light and air pollution.
8. Unfair of the Council to reintroduce sites previously deemed unsuitable.
9. Data used to calculate housing requirement was based on pre Brexit data.

10. Additional housing should be accommodated on brownfield sites. The site at West Vale Works should be included in the Local Plan.
11. A previous planning application was refused due to Green Belt, Special Landscape Area and lack of very special circumstances.
12. Loss of open space. Loss of visual amenity.
13. Flooding - development will increase surface water flooding.
14. The site is unsustainable.
15. Lack of employment facilities in the village would lead to out commuting.
16. Negative impact on health and wellbeing.
17. Loss of identity.
18. Objection to indicative capacity.
19. Ecology - impact on wildlife, including owls and bats.

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. It is considered that the exceptional circumstances have been demonstrated to justify the proposed changes to the Calderdale Green Belt boundary.
2. The site assessment process identified that improvements may be required to Jackson Lane and design of mitigation on the network will need to be considered. It is considered impact of additional traffic to be minimal given the capacity of the site.
3. Site access has been assessed as part of the site assessment process, and it is considered that some improvements to Jackson Lane may be required, as well as a Transport Statement, Access Design and mitigation on the network.
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 including detail on education and healthcare provision.
5. The design of any development will be assessed at planning application stage. The site assessment highlights that measures would be required to mitigate any potential harm on the Moorland

Fringes/Upland Pastures. 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.

6. Chapter 20 of the Local Plan contains a Landscape Character policy which ensures that new development is designed in a way that is sensitive to its landscape setting, retaining and enhancing the distinctive qualities of the landscape area in which it would be situated.

7. Policy EN1 of the Local Plan seeks to reduce the amount light pollution that would pose an unacceptable risk to the local amenity. In addition, light or air pollution was not raised as a concern by the Council's Environmental Health Section. The Low Emissions Strategy (2017) EV03; Air Quality Action Plan (2018) EV03 and Air Quality Technical Paper (2018) EV04. These strategies and actions plans are working together to help reduce and manage emissions and improve air quality.

8. The Calderdale Local Plan Housing Requirement Update and Potential Supply Consultation Paper (January 2020) outlines in detail the reasons additional sites have been required.

9. 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.

10. 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.

11. The Green Belt boundaries are proposed to be amended as part of the Local Plan where a site is to be allocated. 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.

12. The site is currently designated as greenbelt but part of the site also performs the function of a natural/semi-natural open space. An assessment of open space in the area shows that there are sufficient

alternative natural/semi-natural areas within the catchment of this site to meet the adopted standards. The visual impact of any development should be assessed at planning application stage.

13. The whole site is in Flood Zone 1 and is not within a surface water flood risk area. Flooding consultants recommend that the site is suitable for development subject to consultation with the Local Planning Authority. The Council's Flooding and Drainage section has commented that a few drainage issues were identified and resolved in the past. The site is considered developable and measures could be implemented to reduce potential for surface water flood risk and provide storage for storm water run-off, through blue and green and blue infrastructure, such as SuDS and green roofs.

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

15. 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.

16. 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. 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.

18. 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.

19. The Council's Conservation (Ecology) Section have highlighted that bats could be roosting in the stables. A Bat Survey is therefore required. It is considered that development of the site is acceptable subject to mitigation.

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.

## **Duty to Co-operate**

#### Main Issues:

1. There is a failure against DtC as the plan fails to demonstrate that effective consultation has taken place with other public bodies to address the strategic issues this proposal generates.
2. Ineffective and overly complicated public consultation.
3. The site is within "most sensitive green belt parcel". It should be excluded from the Local Plan. Amending the Green Belt to increase housing capacity is unreasonable and unacceptable.
4. Utilise brownfield sites first.

#### Council's Response:

1. 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.
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. Issue addressed under soundness.
4. Issue addressed under soundness.

#### Suggested Modifications

1. Remove this site from the Local Plan.
2. Utilise brownfield sites in more sustainable locations.

#### Council's Response:

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

