CALDERDALE LOCAL PLAN

Housing Requirement Update and Potentia

Supply - Representations and Responses

Version 2

Document - Part 1

Calderdale Metropolitan Borough Council

June 2020

Summary of Representations Document

Document Section: Calderdale Local Plan - Housing Requirement Update and Potenti

Representations

Comment ID **HRU1005** Site ref (if applicable): **LP1625**

Person ID: **1243836** Name: **Ms Helen Williams** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

This area cannot sustain such a high-density of new housing. One of the major sites in Greenland is a flood plain, as seen in the last couple of weeks when the grassland on which this houses will be built became a lake. Traffic congestion in West Vale is already totally unacceptable. The pollution from idling cars waiting for half an hour or more to get through the traffic lights is unacceptable. Where are the school places and GP surgery capacity for 1000+ more residents going to come from? It is already almost impossible to get a GP appointment. Why are the greenbelt rules being over-ridden?

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

Duty to Co-operate Reason:

Suggested Modifications:

Take note of the floodplain concerns, especially in light of the recent catastrophic floods in our area. What will be done to alleviate this? Take note of the traffic grid-lock which will occur, making local people unable to get to work on time. Take note of the extra school places needed, and state what and where these would be. Take note of the extra burden on already overwhelmed GP access and state what would be done to alleviate that.

Comments:

Additional Evidence Link:

Comment ID **HRU1019** Site ref (if applicable):

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

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

Ms Child in her letter to the Council dated 16 July 2019 comments on there being a mismatch between housing requirement and the planned employment growth. She suggests that the Council may wish to additional housing sites or revisit the economic strategy to better align with housing supply growth. Turley's report in August 2019 shows they have revised the number of houses required for the existing planned growth and not looked at changing the methodology behind this growth The council has chosen to ignore the findings of the review undertaken by the Leeds Regional Enterprise partnership regarding Local Industrial Strategy that states that increased economic growth should be achieved through increased productivity and not the result of increased job numbers. Taking this into account and the as yet unknown change in population demograph resulting from Brexit I am of the opinion that Calderdale Council needs to reconsider their strategy for achieving economic growth.

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 **HRU1240** Site ref (if applicable):

Person ID: **1243937** Name: **Mrs Debbie Fletcher** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

Although I am not a legal expert, i would suggest that your planned residential development would infringe on the serious health and safety of both human life and wildlife. Also, choosing to build on greenbelt land over the vast options of Brown Belt land (which offer incentives to house builders to build on) would also show contempt and and infringement on local human rights in the pursuant of profit. I have copied this from another person as their words reflect what I also think, Calderdale council should take into consideration the recent floods and how people are anxious every time it rains, allowing building on this land shows contempt from our council, for both human and mailman life

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

Sound Reason:

I believe this is purely for profit, no consideration for the local population or wildlife. Other options for

example Brown Belt Land; why are you not considering this option

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 **HRU1270** Site ref (if applicable):

Person ID: **1128118** Name: **Mr Keith Melton** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Following the inspection at Stage 1 of the Calderdale Local Plan, the Inspector stated the proposed development of housing over the period of the Plan, ie, 840 dwellings per annum (dpa) did not align with the employment growth of the 10318 jobs presented. Further it was shown that current guidance indicates that 1001 dpa would be required to meet this baseline job target or alternatively 1129 dpa would be needed for the 'policy on plus transport' scenario. Calderdale then, through a firm of consultants, reworked the figures and somehow arrived at the revised figure of 997dpa but failed to link this to a corresponding number of jobs. Given different alternatives of dpa v jobs presented to Calderdale by the consultants noneof these were used and the reason for this is unclear. The relationship between dpa and jobs does not appear to be linear, so it is not possible for a layman to determine what the revised job number number ought to be. However, doing the best with the figures provided by the consultants, it seems likely the 997dpa will equate to something between 9500 and 10,000 jobs. What is the actual figure and why has this not been provided? With the increase in dpa from 840 to 997, Calderdale were required to seek more sites to accommodate this increased development and as a result several brownfield sites have been identified as being suitable. The projected number of dwellings which can be built on these is shown to be 1996. It seems Calderdale, when the original plan was developed, took the easy option and chose to plan for the development of greenbelt land and largely ignored the potential of regenerating brownfield sites. Could it be the greenbelt option was chosen because it is easier and cheaper to plan/develop large areas of open land than it is to work on brownfield sites? It is my opinion that brownfield sites should be developed first, wherever possible, as these tend to deteriorate over time and become unsightly. With the 840dpa of the original plan, Calderdale stated that 46 hectares of economic land would be required to support Calderdale's SHMA. The proposed Enterprise Zone on Wakefield Road, Brighouse, will, it is estimated, provide in the order of 1300 jobs. The site on which it would stand is approximately 25.4 hectares. Taking a fairly simplistic view, if this is the case, it seems, assuming the lower figure of 9500 jobs as discussed above, that approximately 185 hectares of economic land will be required

for business development in Calderdale, if local people are to find work, in the Calderdale area. The 185 hectares discussed above is far in excess of the maximum 111 hectares of Economic land identified in the local plan. Calderdale are proposing to build in excess of 3000 dwellings (possibly more with the revised figures??) in the Brighouse area, many of these being on greenbelt land. In this event, it seems unlikely there will be Economic land available for business development in the Brighouse. With the construction of over 3000+ homes it is considered that the traffic in the Brighouse area generally will increase significantly and given that the Enterprise Zone will be fully occupied when the housing development has been completed, the majority of working people will need to work outside the Brighouse area. Taking this to its logical conclusion, the levels of traffic congestion and atmospheric pollution will increase considerably in the Brighouse area, all as discussed in my comments on the original plan. Taking this a step further, what would motivate people outside the Brighouse area to move to the proposed new housing developments knowing they are going to have to travel through a heavily congested town or join one of the busiest sections of the M62 to work outside the immediate area? With the development of the Enterprise Zone, it is considered likely that many of the businesses moving into the units will be established. If local companies in Calderdale and surrounding areas move in, then they will most likely bring most if not all their existing workforce with them. This will not present the people of Brighouse with many new job opportunities. It will however contribute to increased levels of traffic congestion and pollution. The need for infrastucture improvements has to some degree been recognised and plans have been prepared for an additional junction (J24A) on the M62. This is intended to lead to a bypass road round Brighouse, thereby reducing the traffic congestion in the town. However, it is understood there will be no planned spend on this project between now and 2027/28. Since a large proportion of the proposed housing programme is concentrated in the south east of Calderdale, due to easy access to the M62, this is likely to result in problems at J25, as the motorway in this area is already running at capacity. In addition to the proposed housing developments in Brighouse, Calderdale have now identified brownfield sites in Elland and Greetland, also in the south east of Calderdale. Using Calderdale's figures, these could potentially be used to develop 1041 new dwellings. Given the proximity of Elland and Greetland to the M62 at Ainley top, this is likely to add further pressure to this busy stretch of the motorway, which is regularly at a standstill and more like a car park. Also, the other routes out of Elland, to Halfax and Brighouse are always extremely busy at peak times with long queues of traffic, particularly at Salterhebble. In the event businesses in other areas of Calderdale eg., Mythomroyd, Hebden Bridge etc, relocate to the Enterprise Zone, this will leave an economic 'hole' in these towns and unless these businesses are replaced, this could, it is anticipated, lead to a general decline in the area from which they have moved. It is understood that new businesses in the Enterprise Zone will pay rates to Leeds City Council. If businesses from the Calderdale area move into the Enterprise Zone they will no longer pay rates to Calderdale Council. To encourage Calderdale businesses to move to the Enterprise Zone does not appear to make economic sense. Since the consultation on the original plan, Brighouse, like Mytholmroyd,Hebden Bridge and other Calder valley towns, has been caught up in the recent floods. The extent of the floods may be seen on Youtube video clips and Brighouse was named in the Sunday Times (Feb 16th 2020) alongside these other towns as places where the government would start on flood schemes by the winter of 2020. It is my opinion that any proposals to bring businesses and new housing developments into Brighouse with the consequent increase in traffic volumes should be shelved until such time that proven flood defences are in place. Inevitably the proposed housing and Enterprise schemes will be costly, as will the infrastructure (road improvements, schools, dentists, healthcare surgeries etc) to support them. It is understood that both Calderdale Council and West Yorkshire Combined Authority already recognise there will be funding issues. In my view, neither the housing schemes or the Enterprise Zone projects should be started until the required finance is in place.

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

Duty to Co-operate Reason:

Considering the Calderdale plan and the likely lack of jobs in the Brighouse area to support the projected working population, traffic levels into and through Brighouse will in the long term, and probably the short term as well, rise significantly. Also it is readily forseeable that there will be large volumes of traffic using J25 of the M62 to carry working people to jobs outside the area, eg.,in Leeds, Manchester,Bradford etc. At the same time as the development work is taking place in the Brighouse area, Kirklees will be building a large scale housing development at Bradley together with a Business Park at Cooper Bridge. As a consequence of the Kirklees development work, it is anticipated the traffic levels in this area will also increase significantly and give rise to congestion at Bradley Bar roundabout and even more congestion at Cooper Bridge roundabout than currently exists. In the circumstances, it is considered much of the traffic travelling through Cooper Bridge will head towards the M62, joining with the traffic leaving Brighouse. Clearly the joint Calderdale and Kirklees developments will, it is anticipated, create massive levels of traffic congestion and air pollution, something which should have been readily forseeable and addressed if there had been appropriate co-operation between the two Councils.

Suggested Modifications:

Consideration should be given with regard to how the high levels of traffic congestion already existing in the Brighouse area can be reduced before any construction work begins. Also, detailed plans should be made to deal with the projected levels of traffic which will be generated when the working population of the new housing have to leave and return from work which is outside the immediate area.

Comments:

Additional Evidence Link:

Comment ID **HRU1301** Site ref (if applicable): **LP1567**

Person ID: **1243961** Name: **Mr Steven Brocklehurst** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

I completely object to this proposed land being built on in Elland (exley). As a home owner living on plains lane for 7 years now, every year we have been close to being flooded, not just at times when canals and rivers have flooded on park road but I have evidence of streams building up on the fields behind my home from October last year. It is a huge concern for me and my neighbours as every time it rains heavily our cellars begin to fill with water and the fields build up and streams appear. I have sufficient evidence of this over the years! I don't think flooding is a possibility if houses are built on these fields, I think it is a certainty!! Not only is the flooding a huge risk to the houses around plains lane but what ever happened to protecting the green field sites that we have come to enjoy over the years? Our Elland is a beautiful town with beautiful scenery and every week we get to see the local deer, rabbits, foxes and huge range of birds that come to rest on these fields. We should think real hard about the nature and welfare of our wild animals before building on our greenfield sites!

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

Sound Reason:

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5609759

Comment ID **HRU131** Site ref (if applicable): **LP1523**

Person ID: **1241728** Name: **Mrs Kathleen West** Organisation:

Agent 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:

I disagree with the Council. This site accesses onto a very busy road, Westercroft Lane. Another 51 houses to an already overcrowded school, doctors surgery and village. Westercroft Lane have problems enough with the Cricket, football and running club. Most weekends you can hardly get down the lane in question because of excess numbers of parked cars on a very narrow road. Northowram has had so many large developments over the last few years and commonsense should prevail that it gets to a point when the infrastructure is completely exhausted. This is green belt and I feel should remain so.

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 **HRU1410** Site ref (if applicable):

Person ID: **1243136** Name: **MR Nick Davis** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

no infrastuture plans ,,schools

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

Sound Reason:

no infrasture plans ,school and GP places no road upgrade in a very congested area ,no consideration for flooding no consideration for diffcult access to sites ,,pollution

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

Duty to Co-operate Reason:

no real consultation with local populace ,no answer for infrastucure development ie schools gps road and traffic chaos buliding on green belt when brown sites exist ,buliding on flood ares or causing flooding further down stream

Suggested Modifications:

a real plan for transport and congestion ,buliding new schools and GP surgerys in an already saturated area ,avoid building on green belt and flood or run off zones ,consider brown or ex industrial sites more tree planting and answers too added pollution

Comments:

Additional Evidence Link:

Comment ID **HRU1525** Site ref (if applicable):

Person ID: **1130161** Name: **Dr Katharine Carlton** Organisation:

Agent ID: Name: Organisation:

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 Planning Inspector gave Calderdale MBC a number options based upon economic forecasting & housing requirement. Calderdale MBC chose to increase housing numbers based upon an incredibly optimistic growth strategy promoted by the West Yorkshire Combined Authority (WYCA). Despite increasing the housing numbers, document CC33 (Sustainability Appraisal) identifies Calderdale's approach will still provide a shortage of affordable housing. CC33 outlines 17 Strategic Objectives, however, the impacts of 9 of these objectives (for Calderdale MBC's preferred option) are classed 'uncertain', 2 are 'N/A'. The great uncertainty over the impact of these objectives is deeply problematic, particularly with regard to air pollution, traffic pressure and flooding. The bulk of development is still in the South East corner of Calderdale, rather than in the more deprived areas of the Borough such as parts of north Halifax. The plan does not provide many economic aspirations / jobs for Illingworth & Mixenden ward for example. The type of housing envisaged by Calderdale MBC does not take into account the ageing population of the Borough

and their needs.

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

Duty to Co-operate Reason:

There has been little or no public consultation with neighbouring Local Authorities - the developments in Kirklees bordering Brighouse / Rastrick will increase traffic along roads which are already gridlocked at peak periods. The flooding in February 2020 highlighted the issues around removing land from greenbelt for development, surely, building upon floodplains and higher ground will exacerbate an existing problem. (see photo below)

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610034

Comment ID **HRU1527** Site ref (if applicable): **LP0177**

Person ID: **1243033** Name: **mr john howarth** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

the site at Greetland LP0177 meets all requirements for a housing site it is bounded on three sides by built up areas and an easily defendable boundary on the remaining side the Black Brook , the site contains a school with a further developable area of two acres which it owns and would accommodate children from new developments ,this site is about 300 meters from shops and facilities in West Vale and frequent bus services to neighbouring towns ,To the West of the site and directly adjoining LP0177 earlier this year an area of over five acres has been been reclaimed from industrial and returned to wildflower meadows , a site of 7.5 acres of industrial zoned land has become available this week and discussions are ongoing with a major company for a green research and development facility which would be about 600 meters from this site .There are no plans to develop on the flood plain of the Black Brook and rainwater run off could be mitigated by SuDS ,many concerns are raised about transport infrastructure ,I personally have never in the last twenty years not arrived at my chosen destination when travelling from Greetland ,my company which has traded from Greetland has always taken pride in our philosophy of on time every time ,and with traffic management I cannot see any problems arising ,it has of course been raised that this site is green belt and of course should only be released in exceptional circumstances ,the circumstances are there for all to see a desperate national housing shortage ,correctly planned this site will offer new homes for future generations of the people of this area ,an increase in population will encourage new business,s to open and flourish ,there are indeed a great many positive benefits to be had from an increase in population a town that stops growing is in decline ,on the air quality issue this must be properly surveyed and action taken to ensure that measures are taken to properly manage this ,I would point out that the average yearly windspeed for Calderdale taken from met office data is over 7 kph from our prevailing westerly wind .I would respectfully ask that having taken into account the positives that this new plan has for Calderdale is adopted.

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

Sound Reason:

This plan has been meticulously put together examining the best way forward for the whole of Calderdale ,it utilises the latest report by Turley to identify growth and housing requirements ,brownfield sites have been correctly identified and will be used for housebuilding were appropriate ,it will enable Calderdale to flourish both as a place for work and leisure

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

Duty to Co-operate Reason:

The local plan has been well publicised ,with local meetings and options to comment online or by mail ,the team at Calderdale have been readily available and willing to explain the plan so that it could be easily understood if you required any further knowledge

Suggested Modifications:

no modifications

Comments:

Additional Evidence Link:

Comment ID **HRU1553** Site ref (if applicable):

Person ID: **717690** Name: **Mr Jason Carlton** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

I found the 'Sustainability Appraisal' to be a superficial document It does not consider the cumulative effects of the proposals, The documentation does not provide any analysis of the cost implication planned mitigations for the proposed developments are not detailed, making it impossible to reach an informed decision on the sustainability (or viability) of the proposals. The individual site appraisals lack detail around required interventions, an objective view of their suitability (or otherwise) is difficult to reach without understanding any interventions It is disappointing that the Infrastructure Delivery Plan was not updated at the same time, meaning we cannot be confident the interventions are appropriate and can be funded.

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

Sound Reason:

It would appear my earlier comments, made in 2018 and to the Inspector about document and version control have been ignored - evidenced by two versions of the 'Turley' with the same date and title, and no detail on revision numbers available during this consultation. I am concerned that this consultation is 'unsound' because the 'selective editing' of comments from the Planning Inspector's letter 16 July 2019 has focused the consultation around increasing the number of homes, without considering the second option in the Inspector's letter, namely re-evaluating the economic strategy. There are several reasons why re-

evaluating the economic strategy would be prudent, if only to confirm the current approach is still acceptable and deliverable West Yorkshire Combined Authority's (WYCA) financial position. The February 2020 budget projects a budget surplus of Â£10m becomes a near Â£240m deficit within the next three years [1] . WYCA'S 'Clean Growth' Strategy list details more projects than they have funding for; the strategy recently renamed 'Tackling the Climate Emergency', but no additional funding available. The current Growth Deal funding ; comes to an end in March 2021 and the size and shape of the financing beyond this date is unknown. Short term funding streams supporting skills and business interventions also come to an end during this time period, creating a huge gap in the Combined Authority and LEP's ability to respond in these critical areas. Local Council funding - WYCA is largely funded by a combination of government grants and the transport levy paid by the constituent local authorities ; Bradford, Calderdale, Kirklees, Leeds and Wakefield. Local authorities are facing a problematic funding position as they continue to await the outcome of the fair funding review and the comprehensive spending review later in 2020. Meanwhile, their funding continues to fall, and the demand for their services continues to increase. Revenue budget beyond 2020/21 [2] WYCA has present budget shortfalls that would be exacerbated by the cliff edge funding that comes to an end. Additionally, all major capital funding streams should be spent by the start of 2021/22, other than West Yorkshire plus York Transport Fund, and depending on the success of bidding for further funding streams, both the delivery team and the associated capitalisation will need to be reconsidered. Growth deal funding, which makes up the most significant element of the capital funding available concludes in 2021 and projects have to be delivered within these timescales. West Yorkshire plus York Transport Fund beyond 2021 [3] WYCA acknowledges -“a broader capital programme that would need to be supported by borrowing or yet to be identified funding streams. At this stage government's intentions with regard to future capital funding opportunities are not yet known."
Calderdale Council's funding Calderdale recently acknowledged it also has funding challenges and is forecasting budget deficits of Â£0.7m, Â£2.8m, Â£3.6m, Â£6.4m and Â£7.7m for 2020/201 to 2024/25 [4]
[1] https://westyorkshire.moderngov.co.uk/documents/s14786/Item%205%20-%20Appendix%203.pdf [2] Item 6 ; WYCA meeting, Thursday 9 January https://westyorkshire.moderngov.co.uk/ieListDocuments.aspx?CId=133&MId=836 [3] https://westyorkshire.moderngov.co.uk/documents/s14365/Item%206%20-%20Budget%20and%20business%20plan%202020-21.pdf (points 2.16 and 2.17) [4] https://www.calderdale.gov.uk/nweb/COUNCIL.minutes_pkg.view_doc?p_Type=AR&p_ID=71558

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

Duty to Co-operate Reason:

Suggested Modifications:

1. Reduce the economic aspirations to match current housing at 840dpa number or change the spatial distribution of sites to distribute growth across the borough

Comments:

Additional Evidence Link:

Comment ID **HRU1606** Site ref (if applicable):

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

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

I have serious concerns about the validity of the process of finding sites. Over the period of this poorly run consultations sites have seemingly being chopped in and out in a bid to achieve numbers and on a political point scoring basis. I have seen no information with regard to challenging the numbers required from central government from people who have likely never visited the area's and understood the topography and flooding issues the local residents face annually. As such I do not believe the local plan to be legally compliant as I feel the process of filtering the sites has been done with out good process or a balanced approach.

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

Sound Reason:

I have serious concerns about the validity of the process of finding sites. Over the period of this poorly run consultations sites have seemingly being chopped in and out in a bid to achieve numbers and on a political point scoring basis. I have seen no information with regard to challenging the numbers required from central government from people who have likely never visited the area's and understood the topography and flooding issues the local residents face annually. As such I do not believe the local plan to be legally compliant as I feel the process of filtering the sites has been done with out good process or a balanced approach.

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

Duty to Co-operate Reason:

I have not seen any information or meeting notes or minutes that suggest the "duty to co-operate" has been achieved. i appreciated this does not necessarily mean its a duty to agree. Similarly i have seen no coordinated documentation on infrastructure and planning, therefore i can only conclude the audit of duty to co-operate is not fulfilled.

Suggested Modifications:

Its very clear that the sudden availability of brown field sites at this late stage is clear indicator that this process of filtering sites in line with the NPPF is unsound and has not sought to protect the green belt which is continually being removed in large quantities. Modifications should be to protect the green belt, review all rejected sites and plan development in a long term sustainable way which ensures the land protects the environment and is used to mitigate the flooding and air quality which is the most crucial factor for everyone.

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610164

Comment ID **HRU1708** Site ref (if applicable): **lp0177**

Person ID: **1244065** Name: **Mrs Nicola Wild** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

1) Impact on greenbelt 2) additional flood risks 3) air quality 4)traffic impact 5) Impact on wildlife 6) Infrastructure Greenbelt. The NPPF states that land should only be removed from greenbelt in exceptional circumstances and when all other brownfield sites have been used up or considered. There are other sites in the area (such as the mill which has been demolished in west vale) which should be assessed as potential building sites in the area if these are definitely needed (at present Rightmove are showing approximately 40 houses of varying size an value on the market) According to the NPPF Para 143 under 'Proposals affecting the Green Belt' it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' The greenbelt land proposed for building is supposed to be protected land. There are no exceptional reasons to remove the area from greenbelt status that anyone has been made aware of. Destroying this green belt land is also destroying part of the wildlife corridor which lives on the land. This area is used regularly by the community and has a significant effect on the communities health and well being. As it is regularly used by for safe walks away from traffic in an area where you can soak up the natural beauty and escape from the hustle and bustle of daily life, which all help to maintain a healthy community. The Local Plan does not address the implications of the National Planning Policy Framework, especially, NPPF Para 177 and the associated PPG in the Sustainability of Greenbelt Sites. Calderdale's Review of the Green Belt in 2017 showed that this plot (LP0177) performed well in the three (out of 5)relevant key purposes of Green Belts as identified in the NPPF. -to check the unrestricted sprawl of large built-up areas; -to prevent neighbouring towns from merging into one another; -to assist in safeguarding the countryside from encroachment; Flooding. The area often floods in varying degrees ; the worst instances in recent times have been Boxing Day 2015 and recently February 2020, the development will have a significant detrimental impact on flooding. The run off into Black Brook will cause serious downstream effects so it is hard to understand how any flood plan could mitigate against the risk of even more severe flooding in West Vale leading to major issues for all the businesses and residents. Further development to these sites will only increase flooding to both the future homes but will have a detrimental effect on people and property particularly downstream in Elland, which has been badly hit over the last few years. It is impossible to understand how the proposals in the local plan can be in any way aligned to the recent declaration by Calderdale Council of a 'climate emergency'. Climate change inevitably means that the weather systems that brought flooding in 2015 and 2020 will become more frequent and more severe. These proposals will therefore inevitably lead to a flooding emergency. Even if flood defences are put in place to stop this area flooding then the water will either back upstream and cause floods higher up or force water downstream faster and cause floods lower down (possibly in west vale which is already close to flooding at times of prolonged heavy rain). The higher sloping areas of this plot act as a filter that soaks up the rainwater slowly and releases it gradually onto the plot below. If houses are built on these fields then the water will simply run off and flood the area below more rapidly. As it is stated in the Council's own Infrastructure Delivery Plan, 'Effective flood risk management is achieved partly by avoidance of inappropriate development in high risk zones'. Air Pollution. Developing on these sites will massively increase air pollution within Greetland and surrounding areas . The severe increase in traffic (potential for 1200 additional cars which could equate to 2400 journeys each day) down an already congested Saddleworth Road is bound to add to the air pollution issues which cause both short term and long term effects on health. This is especially concerning as the proposed site is literally next to the KS1 primary school site and preschool, both of which are situated on a main road in a valley bottom where the air pollution is at its most concentrated. Currently traffic backs up on a regular basis outside these schools and remains stationary, giving off huge amounts of pollution. This is also the case around West Vale where traffic currently bottle necks and remains stationary next to the West Vale primary school playground.We

are not aware of any air quality assessment being undertaken in this area so can only imagine the extent of air pollution the proposed development will create. It certainly goes against the Governments strategy on air quality. Traffic Congestion. Currently West Vale cannot cope with the amount of traffic at rush hour. With the junctions at the bottom of Saddleworth Road and Rochdale Road, as well as fairly dangerous entrances into the Co op and Andy Thornton car parks, already creating bottle necks throughout the day, a potential increase of 1200 extra cars is unthinkable. With the proximity of the buildings to the road and junction there is no room for road widening for extra lanes and any recalibration of traffic lights would do little to ease the problem. There have been many near misses at the set of lights atthis junction caused by the frustration of drivers not being able to progress their journey in reasonable time. It would also seem Calderdale are planning to make a HGV turning circle in Ripponden to redirect HGV's through Greetland instead of Sowerby Bridge. Already we have large lorries, such as the Sonoco ones, careering down Saddleworth Road. Adding extra seems irresponsible in my opinion. The extra traffic from the development and these HGVs would also create an increased road safety risk for the school and for the residents of Saddleworth Road. Wildlife The proposed sites for development is home to many protected species for example bats, owls, herons, woodpeckers, sparrow hawks, deer and foxes which are seen on a regular basis. With the destruction of such a large area of greenbelt would see the habitats that these animals need to thrive destroyed. Infrastruture The number of homes planned is completely disproportionate to the size of theexisting areawith no infrastructure plans in place to accommodate such a plan. So many additional houses would massively increase the size of Greetland. The figures show a small percentage increase in 'urban sprawl' but this is down to the fact we have been added into the Elland and Stainland area. The number of houses planned would have a significantly disproportionate impact on the area The Doctors and Dentist in Greetland are already full and not taking on new patients and one is soon to close, again impacting on the two remaining local ones. The road network and sewerage system will also not cope with such an increase. On Ellistones Place we already have to use a pumping station for our waste. The Local School is a split site school with no space for expansion on either site. The school is already full taking in 60 children per year. This lack of school spaces will result in children having to travel further to a school again causing more traffic. There does not appear to be any significant plans in place to improve infrastructure in any way. The development has only one road in and out and all the residents would have to use their cars as the development is not on a regular bus route. .

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1751** Site ref (if applicable):

Person ID: **1244202** Name: **Mr Adam Kershaw** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

LP0026 - The Gate Farm, Saddleworth Road, Greetland, Elland, HX48NW LP0177 - Land adjacent Ellistones Place, Saddleworth Road, Greetland, Elland, HX4 8NW LP0952 - Land at New Gate Farm, Saddleworth Road, Greetland, Elland LP1625 - Land to the west of, Silverdale Terrace, Greetland, Elland, HX4 8NQ The site requirements relating to the release of the land from Green Belt is not legally compliant, adequately prepared, fully justified or consistent with National Planning Policy Framework (NPPF) and accompanying Guidance(NPPG). Procedural and Legal Compliance Issues I am concerned that Calderdale council has not adhered to legislation set out in The Climate Change Act 2008 (2050 Target Amendment). I am not able to see any evidence of additional measures to respond to climate impacts of above-trend growth in employment and housing. In addition to this, I am concerned about issues actually acknowledged by the Council itself, particularly regarding traffic impacts and flooding. For issues surrounding the proposed development, regarding traffic and flooding, it would appear that the proposal is not, according to the NPPF, sustainable.When the harm identified is taken into account, the proposals are clearly deemed unsustainable. The land in this site is also unsuitable for development due to issues relating to Green Belt and Heritage Assets, and recent planning case law determined by High Court Judgements relating to the siting of Listed Buildings.Further to this, the proposals are not supported by Housing Infrastructure Fund (HIF) from Homes England, and the inadequacy of existing infrastructure to accommodate this level of growth confirms that the proposals are unsustainable. This has even been publicly recognised by our local MP, Craig Whitaker. Flooding Certainty Part of the site is allocated as Zone 3a and is at the bottom of the chain for development, with development only acceptable if sequential and exceptions tests are passed. There have been no such tests carried out. There is evidence that the site floods both severely and routinely. The way in which this happens actually protects property and infrastructure from harm caused by flooding. Mitigation can not equal or surpass the work currently done by this land as it stands. Black Brook routinely bursts its banks, taking hold of entire expanses of meadow land, posing significant danger to both life and property. There is extensive photographic and video evidence of this. Our community begs you to recognise that there is not a risk of flooding in this area, but a certainty of it. The way in which this site faces routine flooding has been well documented on the reginal news. National news is now starting to contact the pressure group. This is something we have not gone looking for, but instead finds us, due to our level of flood risk, or 'flood certainty' as it is now known within the community. We are a small village in Calderdale Yorkshire, why are we being contacted by national media outlets? The issues we face here are real and they are huge. The entire span of land on LP0177 including South of Greetland Academy School was severely flooded in February 2020 (evidence attached). Greetland Pressure Group has attracted attention from both local and regional press and TV with regards to recent flooding and proposed development. This land routinely floods and would leave any proposed development at risk along with any access roads. Development sites LP0177, LP0026, LP0952, LP1625 are critically important in alleviating any further flooding issues by soaking and storing surface water run off from the large amount of natural springs in the area. The Army was even called into Calderdale, in a bid to help protect people and property from yet another severe flood, also in February 2020. The way in which the Calder Valley routinely experiences flooding can be best understood by Tim Swift's, Calderdale Council Leader, words when he urged the government to grant Calderdale urgent assistance. Swift would like to see Calderdale recognised as a 'Tier 1' authority, which would entitle Calderdale to extra funding support, as 'Calderdale is one of a small number of areas in the country at ''sustained risk'' of flooding.' The head of our council has even recognised the significant threat we face in this area. The topographical context of the proposal in Greetland lends itself to increased flood risks, due to the abundance of natural springs, the water course, and the steep valley sides. All of the factors that contribute towards flooding are against us. Flooding in this part of Greetland is a certainty that grows year on year with the ever-increasing threat of Climate Change. The way in which this valley, with its steep sides, floods is a natural hazard. Residents on Woodfield Drive had to take action to prevent their homes from flooding in February 2020, and not for the first time either. We have photographic evidence of how this is a routine battle that residents face, and not enough is being done to help prevent this from happening in the future. To build on this land would be to

sign residents and the community to an unbearable, unavoidable fate. The NPPF states that, 'due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere.' The topography of our area would not allow for it to be any other way than to increase the risk of flooding to the existing community. The sloping grassland, the trees and the flat flood plains of the land put forward in Greetland in the Local Plan retain an immeasurable amount of water when it really matters. No amount of 'mitigation' can compete with this. To build on this land would have catastrophic and irreversible ramifications, and not just for the immediate area, but for the areas further downstream currently protected by this precious land and the way it currently functions. Prime Minister Boris Johnson has even, on multiple occasions in the press, called for councils to stop allowing building on flood plains. Part of Site LP0177 lies within flood zone 3A ; the highest classification of flood risk in terms of land that could potentially be considered appropriate for development. The zone 3A is immediately adjacent to the western and southern boundaries of Woodfield Drive. The land immediately adjacent to the whole southern boundary of the proposed 3 allocation sites is also allocated as flood zone 3A. The photographs that are attached to this submission show the flooding that has occurred on the land. Given that the land is not only identified as being at risk of flooding but is also evidenced as having flooded, there is no justification in land drainage terms to bring these sites forward for housing. Paragraph 155 of the NPPF clearly states that, -“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk"In putting these sites forward the Council is ignoring the policy requirements of the Framework. The reports compiled by the Council for all four sites on Saddleworth Road when putting together the Publication Draft version of the Local Plan in 2018 concluded that all three should be filtered (i.e. not taken forward as housing allocations) because of ; amongst other things ; flooding and drainage issues. Sequential and exceptions tests would have been necessary to demonstrate that the sites were suitable for and safe to develop. Although the Planning Inspector identified an insufficient supply of housing land following the Stage 1 examination process, it should not simply follow that additional sites are now allocated without a thorough assessment being made as to their suitability to counter the reasons why they were initially filtered. The four sites on Saddleworth Road seem to have been put forward as a simple response to the Inspector's comments with no consideration of the flooding and drainage issues associated with the land. It is clear that there are blurred lines of responsibility and accountability when serious flooding issues arise between Developers, Councils and the Environment Agency. We need accountability when reckless planning leads to catastrophic flooding issues. Green Belt The Green Belt Review carried out in 2017 considered all three of the sites ; reference numbers 065 and 339 in the review. The conclusion of this review was that all of the sites performed strongly in terms of their Green Belt function, meeting at least 3 of the 5 purposes of including land in the Green Belt. Those 3 purposes were: To prevent neighbouring towns from merging into one another; To assist in safeguarding the countryside from encroachment; To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The 0952 allocation was also considered to meet a further purpose in terms of checking the unrestricted sprawl of large built up areas. We would argue that all four of the sites should be considered to serve this purpose, it makes no sense for just 0952 to do so but 0177, 0026 and 1625 not to, given they are all inextricably linked. Development of all sites would result in the unrestricted sprawl of the large built up urban area of Greetland. The four site assessment reports carried out ahead of the consultation on the Local Plan Publication Draft in 2018 concluded that the land represented the -“most sensitive Green Belt"Given this there is no planning policy justification to ignore that impact ; importantly carried out as part of a thorough Green Belt Review of the borough just over 2 years ago ; and now consider the sites suitable for allocation for housing. Such allocation would conflict with key purposes of including land in the Green Belt and would have a fundamental adverse impact on the openness of the Green Belt. Erroneous justification of housing requirement for Green Belt release Green Belt boundaries should only be altered in 'exceptional' circumstances. This land has been identified as the Most Sensitive Green Belt. The CalderdaleLocal Plan, which has suffered from a democratic deficit

throughout its many iterations, sets a targetfor housing based on pre-Brexit demographic evidenceofObjectively Assessed Need (OAN). Thismeansthat the Green Belt asdesignatedin the current UDP has had to be reviewed. The OAN is far too great and as it relates to out-of-date population projections used in Strategic Housing Market Assessment(and update)that have been superseded by lower projections in more recent Office of National Statistics releases that would result in a much lower housing target and the reduce the need to release the number of Green Belt sites. Further, the ambitionsof the Councilfor annualjobs growthover a 16 year period characteristic of a constant 'boom' inflate the requirement well beyond the realistic possibility of actual delivery. It is notresponsibleto allocate land, including a significant amount of Green Belt release,tomeet inflated housing targets based on out-of-date household projections and ambitious and continual jobs growth. The housing target needs revisiting to model scenarios reflective of evidenced-based jobs growth (rather than ambitions), up-to-date household projections (including post-Brexit population projections) and the priority to contribute to sustainable development that does not harm the environment (including the Council's Climate Emergency commitments). The Calderdale LocalPlan has been overtaken by events both demographically, economically and environmentally. At this point, the Council is proposing to adopt a Local Plan that runs entirely against the corporate ambitions of theauthority. It is simply the case that no plan at all (and reliance on the NPPF & NNPG to direct new developments, which wouldincludethe protection of sensitive Green Belt) would be better than theproposedLocal Planthat isunder examination. Disproportionate The most recent revisions to theLocal Planin response to the Inspector's letter includethe addition ofmore Green Beltsites(including LP0026, LP0177, LP0952, LP1625)for release, whichrepresents further unsustainable developmentasa disproportionate amount ofthenew homes proposedareacrossjustfour sitesinGreetland. Indeed, 1,041 additional units of the 1,708 on these new housing sites (over 60%)areproposed in the Elland area alone. There has been substantial development of land in bothGreetlandand Elland in recent years. This cumulativedevelopmentmeans that the landon Saddleworth Roadis the only remaining parcel of the original Green Belt still in agricultural use. Development of the site would erode the visitor's understanding of the extent of the original manorial lands thatGreetlandcovers. Unsustainable Development The Council's Sustainability Appraisal process to support the release of thesiteis inadequate. The site report states that the assessment of SA7 is 'Negative' and marked 'RED' commenting that ''Overall the impact is negative as the site isgreenfieldand lies within flood zones 2 and 3''. The site should be excluded on this conclusion alone, particularly within the wider context of the Council's recent declaration of a Climate Emergencyand recent flood events. Further, the report does not grapple with the issue in the overall conclusions inadequately noting that "with regards to SA7 and flood risk, the impact is negative as the site is greenfield and lies within flood zones 2 and 3" with no specific mitigation measures identified. This does not come anywhere close to an adequate assessment to justify release for development. The Sustainability Appraisal for the Local Plan has notbeenmapped or measured.The benefits of, or the opportunities for, the provision of ecosystem services by the Green Belt land directly around the urban environmentare unrecorded. Section 39 of the Planning and Compulsory Purchase Act 2004 states that a local authority exercising their plan-making functions must do so with the objective of contributing to the achievement of sustainable development. Action 5 of the EU Biodiversity Strategy to 2020 requires member states to map and assess ecosystems, whilst the Minister of State for the Environmentreiteratesthe necessity to map and value the natural capital that make up ecosystem services, specifically in urban environments, in order to improve sustainable planning. Further, the NPPF sets out a presumption in favour of sustainable development and advises that the planning system should contribute to and enhance the naturaland local environment by a number of measures that include 'recognising the wider benefits of local ecosystems. Wildlife Paragraph 175 of the NPPF states that, 'When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts)"¦' which the community is immediately able to jump in with stating that this cannot be said to be the case in the Calderdale Local Plan, as land was removed from Stainland, which is far less sensitive, in terms of the risk development would pose to wildlife, biodiversity,

habitat and landscape. In this way the land in Greetland put into the Local Plan is not compliant with the NPPF. Developer Influence Profit should not dictate planning policy, at a great cost to the environment. In relation to the rest of Calderdale, house prices in Greetland are very high. The developers have not expressed an interest in the overwhelming amount of brown field land available in Calderdale, because the return on investment is so much higher when development is passed in beautiful Green Belt land, set within a village connected to high house prices. The developer is further enabled to do this because it has a monopoly on the large-scale building development taking place in Greetland. Plans have been drawn up for the different sites within Greetland, the sites have been given different codes, and yet the land is almost entirely unseparated by anything physical; essentially, to this community, the separate plots are one piece of land, irrespective of who owns the land on the land register- the development will be concentrated in one place. Different developers have been assigned to the various codes given to our continuous area of Green Belt, however, when this is examined further, it becomes apparent that the developers largely belong to the same parent company. How can Calderdale Council resist pressure from this monopoly situation? They are already under time constraints to designate land to the Local Plan. This is a toxic situation for Calderdale, and thus renders it impossible for the council to deliver the right homes in the right places. The Local Plan in Calderdale has become entirely about developer profit, and not at all about growing the local economy for local people. Severe Lack of Infrastructure Greetland School is an Academy and therefore it is not obliged to expand. In the Council's individual assessments of the sites which resulted in them all being filtered and not taken forward for housing, the consultation from Highways England advised that the development of the scale envisaged would have a significant adverse traffic impact on the Strategic Road Network. Given this how can the sites now be put forward for allocation for housing when nothing has been done to either challenge those comments or address them? The sites in Greetland have not had traffic assessments carried out. Sites elsewhere in Calderdale have been filtered from the Local Plan due to traffic constraints. Given the existing levels of high congestion at the West Vale traffic lights, why has assessment not been carried out? Why has air pollution not been measured? Is it because the sites in Greetland are too appealing to developers, given the high house prices in the area, and something like a traffic assessment would throw a spanner into the works, as it were? Where is the Traffic Plan in the site reports for these sights? These sites have been allocated without appropriate assessment of local road networks. To say that the cumulative traffic impact is being assessed is not sufficient, especially given the scale of the proposed development. To increase the amount of traffic on Saddleworth Road, when it is already so heavily congested, and with a high volume of HGVs, by any amount of traffic, without a proper assessment is not a sustainable practice in planning terms. Heritage No assessment has been made of heritage impact The site assessment reports carried out in advance of the 2018 Publication Draft identified other areas of policy conflict with all three sites ; in particular heritage, open space and sustainability. It was at that time recommended that none of the sites on Saddleworth Road should be allocated until an assessment had been made of the heritage impact. To our knowledge that has not occurred. The sites were identified as providing valuable natural and semi-natural open space. This would be lost if the sites were allocated for housing. In terms of sustainability, a negative factor in not bringing the sites forward in the 2018 consultation was the distance to a railways station (in excess of 2kms). By definition that negative factor remains and forms part of the reason why other potential sites in the area have not been brought forward (such as site LP1089 on Rochdale Road). Open Space There would be complete loss of natural and semi-natural open space Air Pollution The homes proposed in Greetland will significantly add to air pollution. This goes against The Clean Air strategy 2018 adopted by Calderdale Council; yet to build these houses would put our children who attend Greetland School and Sunnybank Pre-School at higher risk of ill health due to further increasing air pollution as their playground is only a couple of feet away from the already very busy congested main road which carries a lot of heavy good vehicles, due to a 24 hours recycling plant, which is only accessible by Saddleworth Road ; the road the development is intended for. Inflated housing target at the cost of great environmental harm Calderdale have based their growth on the WYCA anticipated employment figures (which is between 35,000 to 50,000 new jobs for the LeedsCity Region as a whole The Leeds City region has produced below

average employment over the past 30 years but in their Strategic Economic Plan they envisage well above average growthin the next 15 years. This is extremely optimistic given that the current UNEMPLOYMENT rate in Yorkshire is 4.3% which is the second highest of any region in the UK and is currently increasing. If Calderdale's economic growth was more accurate, there would be no need to destroy precious Greenbelt land. The Council have proposed a number of alterations to its Green Belt boundaries to simply meet an inflated housing target at the cost of great environmental harm. The NPPF is clear that Green Belt should only be altered in exceptional circumstances through the preparation or review of a Local Plan. Where it is necessary to consider revision of the Green Belt, this review should be robust in its justification for any alteration ; which is critically missing. The critical importance of early and meaningful engagement and collaboration with communities in producing Local Plans, particularly where this involves altering Green Belt boundaries has not been undertaken as the site has been parachuted into the plan-making process during hearing sessions. This constitutes a seriousbreachof procedural compliance. A local pressure group has been set up at the last moment to attempt to deal with these issues locally and has attracted a significant amount of support. However, the community has not been given the opportunity to produce a Neighbourhood Plan. Neighbourhood Plans can be used by local people to positively shape development in their area, including establishing principles for how former Green Belt sites are developed. Summary All of the reasons why these sites were not brought forward at the Publication Draft stage remain just as relevant now. There has been no further assessment of any of the significant constraints which resulted in the sites being filtered at that stage. The only reason for bringing them forward for allocation now is based on a simple exercise of responding to a requirement to increase the housing supply. There is no justification for allocating these sites given the flood zone allocation and evidence of flooding and given the fundamental conflict with the Green Belt Review in 2017. No consideration has been given to the potential to bring forward other sites in the area that do not carry these fundamental problems. No consideration has been given either to the lack of infrastructure available in Greetland to accommodate such a significant level of new housing. The function of the planning system is to facilitate sustainable development that makes a positive contribution to the environment. It is not the role of the Council torecklesslyrelease demonstrably unacceptable sites within the Green Belt to meet a housing target. The Inspector's letter of 16 July 2019 to the Council notes (Para. 14) that "Local Plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits". This is theundoubtedly thecasehere.No sensible phasing options are proposed related to releaseof the most sensitive Green Belt sitesupontherequirement to demonstrate a five-year housing land supplyeven if the release could be justified. It is illogical to allocate Green Belt sites in Flood Risk Zones 2 and 3 for development before brownfield sites are fully exhausted.The immediate release of the site for development is simply not a sensitive approach to the release ofGreen Belt land even if it were to be appropriate. Later, the Inspector asked the Council to review the option of 'the supply of more suitable and available sites elsewhere'understanding this to be an option, however, the further work on the additional sites considered (incorrectly by the Council) to be 'suitable and available' are not, in fact, suitable and, in any case, it has been revealed that this option on all sites on Saddleworth Road, Greetland (identified below) is simply not sustainable and the proposal is unsound. LP0026 - The Gate Farm, Saddleworth Road, Greetland, Elland, HX48NW LP0177 - Land adjacent Ellistones Place, Saddleworth Road, Greetland, Elland, HX4 8NW LP0952 - Land at New Gate Farm, Saddleworth Road, Greetland, Elland LP1625 - Land to the west of, Silverdale Terrace, Greetland, Elland, HX4 8NQ

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

Sound Reason:

LP0026 - The Gate Farm, Saddleworth Road, Greetland, Elland, HX48NW LP0177 - Land adjacent Ellistones Place, Saddleworth Road, Greetland, Elland, HX4 8NW LP0952 - Land at New Gate Farm, Saddleworth Road, Greetland, Elland LP1625 - Land to the west of, Silverdale Terrace, Greetland, Elland, HX4 8NQ The site requirements relating to the release of the land from Green Belt is not legally compliant, adequately

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The land in this site is also unsuitable for development due to issues relating to Green Belt and Heritage Assets, and recent planning case law determined by High Court Judgements relating to the siting of Listed Buildings.Further to this, the proposals are not supported by Housing Infrastructure Fund (HIF) from Homes England, and the inadequacy of existing infrastructure to accommodate this level of growth confirms that the proposals are unsustainable. This has even been publicly recognised by our local MP, Craig Whitaker. Flooding Certainty Part of the site is allocated as Zone 3a and is at the bottom of the chain for development, with development only acceptable if sequential and exceptions tests are passed. There have been no such tests carried out. There is evidence that the site floods both severely and routinely. The way in which this happens actually protects property and infrastructure from harm caused by flooding. Mitigation can not equal or surpass the work currently done by this land as it stands. Black Brook routinely bursts its banks, taking hold of entire expanses of meadow land, posing significant danger to both life and property. There is extensive photographic and video evidence of this. Our community begs you to recognise that there is not a risk of flooding in this area, but a certainty of it. The way in which this site faces routine flooding has been well documented on the reginal news. National news is now starting to contact the pressure group. This is something we have not gone looking for, but instead finds us, due to our level of flood risk, or 'flood certainty' as it is now known within the community. We are a small village in Calderdale Yorkshire, why are we being contacted by national media outlets? The issues we face here are real and they are huge. The entire span of land on LP0177 including South of Greetland Academy School was severely flooded in February 2020 (evidence attached). Greetland Pressure Group has attracted attention from both local and regional press and TV with regards to recent flooding and proposed development. This land routinely floods and would leave any proposed development at risk along with any access roads. Development sites LP0177, LP0026, LP0952, LP1625 are critically important in alleviating any further flooding issues by soaking and storing surface water run off from the large amount of natural springs in the area. The Army was even called into Calderdale, in a bid to help protect people and property from yet another severe flood, also in February 2020. The way in which the Calder Valley routinely experiences flooding can be best understood by Tim Swift's, Calderdale Council Leader, words when he urged the government to grant Calderdale urgent assistance. Swift would like to see Calderdale recognised as a 'Tier 1' authority, which would entitle Calderdale to extra funding support, as 'Calderdale is one of a small number of areas in the country at ''sustained risk'' of flooding.' The head of our council has even recognised the significant threat we face in this area. The topographical context of the proposal in Greetland lends itself to increased flood risks, due to the abundance of natural springs, the water course, and the steep valley sides. All of the factors that contribute towards flooding are against us. Flooding in this part of Greetland is a certainty that grows year on year with the ever-increasing threat of Climate Change. The way in which this valley, with its steep sides, floods is a natural hazard. Residents on Woodfield Drive had to take action to prevent their homes from flooding in February 2020, and not for the first time either. We have photographic evidence of how this is a routine battle that residents face, and not enough is being done to help prevent this from happening in the future. To build on this land would be to sign residents and the community to an unbearable, unavoidable fate. The NPPF states that, 'due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere.' The topography of our area would not allow for it to be any other way than to increase the risk of flooding to the existing

community. The sloping grassland, the trees and the flat flood plains of the land put forward in Greetland in the Local Plan retain an immeasurable amount of water when it really matters. No amount of 'mitigation' can compete with this. To build on this land would have catastrophic and irreversible ramifications, and not just for the immediate area, but for the areas further downstream currently protected by this precious land and the way it currently functions. Prime Minister Boris Johnson has even, on multiple occasions in the press, called for councils to stop allowing building on flood plains. Part of Site LP0177 lies within flood zone 3A ; the highest classification of flood risk in terms of land that could potentially be considered appropriate for development. The zone 3A is immediately adjacent to the western and southern boundaries of Woodfield Drive. The land immediately adjacent to the whole southern boundary of the proposed 3 allocation sites is also allocated as flood zone 3A. The photographs that are attached to this submission show the flooding that has occurred on the land. Given that the land is not only identified as being at risk of flooding but is also evidenced as having flooded, there is no justification in land drainage terms to bring these sites forward for housing. Paragraph 155 of the NPPF clearly states that, -“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk"In putting these sites forward the Council is ignoring the policy requirements of the Framework. The reports compiled by the Council for all four sites on Saddleworth Road when putting together the Publication Draft version of the Local Plan in 2018 concluded that all three should be filtered (i.e. not taken forward as housing allocations) because of ; amongst other things ; flooding and drainage issues. Sequential and exceptions tests would have been necessary to demonstrate that the sites were suitable for and safe to develop. Although the Planning Inspector identified an insufficient supply of housing land following the Stage 1 examination process, it should not simply follow that additional sites are now allocated without a thorough assessment being made as to their suitability to counter the reasons why they were initially filtered. The four sites on Saddleworth Road seem to have been put forward as a simple response to the Inspector's comments with no consideration of the flooding and drainage issues associated with the land. It is clear that there are blurred lines of responsibility and accountability when serious flooding issues arise between Developers, Councils and the Environment Agency. We need accountability when reckless planning leads to catastrophic flooding issues. Green Belt The Green Belt Review carried out in 2017 considered all three of the sites ; reference numbers 065 and 339 in the review. The conclusion of this review was that all of the sites performed strongly in terms of their Green Belt function, meeting at least 3 of the 5 purposes of including land in the Green Belt. Those 3 purposes were: To prevent neighbouring towns from merging into one another; To assist in safeguarding the countryside from encroachment; To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The 0952 allocation was also considered to meet a further purpose in terms of checking the unrestricted sprawl of large built up areas. We would argue that all four of the sites should be considered to serve this purpose, it makes no sense for just 0952 to do so but 0177, 0026 and 1625 not to, given they are all inextricably linked. Development of all sites would result in the unrestricted sprawl of the large built up urban area of Greetland. The four site assessment reports carried out ahead of the consultation on the Local Plan Publication Draft in 2018 concluded that the land represented the -“most sensitive Green Belt"Given this there is no planning policy justification to ignore that impact ; importantly carried out as part of a thorough Green Belt Review of the borough just over 2 years ago ; and now consider the sites suitable for allocation for housing. Such allocation would conflict with key purposes of including land in the Green Belt and would have a fundamental adverse impact on the openness of the Green Belt. Erroneous justification of housing requirement for Green Belt release Green Belt boundaries should only be altered in 'exceptional' circumstances. This land has been identified as the Most Sensitive Green Belt. The CalderdaleLocal Plan, which has suffered from a democratic deficit throughout its many iterations, sets a targetfor housing based on pre-Brexit demographic evidenceofObjectively Assessed Need (OAN). Thismeansthat the Green Belt asdesignatedin the current UDP has had to be reviewed. The OAN is far too great and as it relates to out-of-date population projections used in Strategic Housing Market Assessment(and update)that have been superseded by lower projections in more recent Office of National Statistics releases that would result in a much lower housing

target and the reduce the need to release the number of Green Belt sites. Further, the ambitionsof the Councilfor annualjobs growthover a 16 year period characteristic of a constant 'boom' inflate the requirement well beyond the realistic possibility of actual delivery. It is notresponsibleto allocate land, including a significant amount of Green Belt release,tomeet inflated housing targets based on out-of-date household projections and ambitious and continual jobs growth. The housing target needs revisiting to model scenarios reflective of evidenced-based jobs growth (rather than ambitions), up-to-date household projections (including post-Brexit population projections) and the priority to contribute to sustainable development that does not harm the environment (including the Council's Climate Emergency commitments). The Calderdale LocalPlan has been overtaken by events both demographically, economically and environmentally. At this point, the Council is proposing to adopt a Local Plan that runs entirely against the corporate ambitions of theauthority. It is simply the case that no plan at all (and reliance on the NPPF & NNPG to direct new developments, which wouldincludethe protection of sensitive Green Belt) would be better than theproposedLocal Planthat isunder examination. Disproportionate The most recent revisions to theLocal Planin response to the Inspector's letter includethe addition ofmore Green Beltsites(including LP0026, LP0177, LP0952, LP1625)for release, whichrepresents further unsustainable developmentasa disproportionate amount ofthenew homes proposedareacrossjustfour sitesinGreetland. Indeed, 1,041 additional units of the 1,708 on these new housing sites (over 60%)areproposed in the Elland area alone. There has been substantial development of land in bothGreetlandand Elland in recent years. This cumulativedevelopmentmeans that the landon Saddleworth Roadis the only remaining parcel of the original Green Belt still in agricultural use. Development of the site would erode the visitor's understanding of the extent of the original manorial lands thatGreetlandcovers. Unsustainable Development The Council's Sustainability Appraisal process to support the release of thesiteis inadequate. The site report states that the assessment of SA7 is 'Negative' and marked 'RED' commenting that ''Overall the impact is negative as the site isgreenfieldand lies within flood zones 2 and 3''. The site should be excluded on this conclusion alone, particularly within the wider context of the Council's recent declaration of a Climate Emergencyand recent flood events. Further, the report does not grapple with the issue in the overall conclusions inadequately noting that "with regards to SA7 and flood risk, the impact is negative as the site is greenfield and lies within flood zones 2 and 3" with no specific mitigation measures identified. This does not come anywhere close to an adequate assessment to justify release for development. The Sustainability Appraisal for the Local Plan has notbeenmapped or measured.The benefits of, or the opportunities for, the provision of ecosystem services by the Green Belt land directly around the urban environmentare unrecorded. Section 39 of the Planning and Compulsory Purchase Act 2004 states that a local authority exercising their plan-making functions must do so with the objective of contributing to the achievement of sustainable development. Action 5 of the EU Biodiversity Strategy to 2020 requires member states to map and assess ecosystems, whilst the Minister of State for the Environmentreiteratesthe necessity to map and value the natural capital that make up ecosystem services, specifically in urban environments, in order to improve sustainable planning. Further, the NPPF sets out a presumption in favour of sustainable development and advises that the planning system should contribute to and enhance the naturaland local environment by a number of measures that include 'recognising the wider benefits of local ecosystems. Wildlife Paragraph 175 of the NPPF states that, 'When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts)"¦' which the community is immediately able to jump in with stating that this cannot be said to be the case in the Calderdale Local Plan, as land was removed from Stainland, which is far less sensitive, in terms of the risk development would pose to wildlife, biodiversity, habitat and landscape. In this way the land in Greetland put into the Local Plan is not compliant with the NPPF. Developer Influence Profit should not dictate planning policy, at a great cost to the environment. In relation to the rest of Calderdale, house prices in Greetland are very high. The developers have not expressed an interest in the overwhelming amount of brown field land available in Calderdale, because the return on investment is so much higher when development is passed in beautiful Green Belt land, set

within a village connected to high house prices. The developer is further enabled to do this because it has a monopoly on the large-scale building development taking place in Greetland. Plans have been drawn up for the different sites within Greetland, the sites have been given different codes, and yet the land is almost entirely unseparated by anything physical; essentially, to this community, the separate plots are one piece of land, irrespective of who owns the land on the land register- the development will be concentrated in one place. Different developers have been assigned to the various codes given to our continuous area of Green Belt, however, when this is examined further, it becomes apparent that the developers largely belong to the same parent company. How can Calderdale Council resist pressure from this monopoly situation? They are already under time constraints to designate land to the Local Plan. This is a toxic situation for Calderdale, and thus renders it impossible for the council to deliver the right homes in the right places. The Local Plan in Calderdale has become entirely about developer profit, and not at all about growing the local economy for local people. Severe Lack of Infrastructure Greetland School is an Academy and therefore it is not obliged to expand. In the Council's individual assessments of the sites which resulted in them all being filtered and not taken forward for housing, the consultation from Highways England advised that the development of the scale envisaged would have a significant adverse traffic impact on the Strategic Road Network. Given this how can the sites now be put forward for allocation for housing when nothing has been done to either challenge those comments or address them? The sites in Greetland have not had traffic assessments carried out. Sites elsewhere in Calderdale have been filtered from the Local Plan due to traffic constraints. Given the existing levels of high congestion at the West Vale traffic lights, why has assessment not been carried out? Why has air pollution not been measured? Is it because the sites in Greetland are too appealing to developers, given the high house prices in the area, and something like a traffic assessment would throw a spanner into the works, as it were? Where is the Traffic Plan in the site reports for these sights? These sites have been allocated without appropriate assessment of local road networks. To say that the cumulative traffic impact is being assessed is not sufficient, especially given the scale of the proposed development. To increase the amount of traffic on Saddleworth Road, when it is already so heavily congested, and with a high volume of HGVs, by any amount of traffic, without a proper assessment is not a sustainable practice in planning terms. Heritage No assessment has been made of heritage impact The site assessment reports carried out in advance of the 2018 Publication Draft identified other areas of policy conflict with all three sites ; in particular heritage, open space and sustainability. It was at that time recommended that none of the sites on Saddleworth Road should be allocated until an assessment had been made of the heritage impact. To our knowledge that has not occurred. The sites were identified as providing valuable natural and semi-natural open space. This would be lost if the sites were allocated for housing. In terms of sustainability, a negative factor in not bringing the sites forward in the 2018 consultation was the distance to a railways station (in excess of 2kms). By definition that negative factor remains and forms part of the reason why other potential sites in the area have not been brought forward (such as site LP1089 on Rochdale Road). Open Space There would be complete loss of natural and semi-natural open space Air Pollution The homes proposed in Greetland will significantly add to air pollution. This goes against The Clean Air strategy 2018 adopted by Calderdale Council; yet to build these houses would put our children who attend Greetland School and Sunnybank Pre-School at higher risk of ill health due to further increasing air pollution as their playground is only a couple of feet away from the already very busy congested main road which carries a lot of heavy good vehicles, due to a 24 hours recycling plant, which is only accessible by Saddleworth Road ; the road the development is intended for. Inflated housing target at the cost of great environmental harm Calderdale have based their growth on the WYCA anticipated employment figures (which is between 35,000 to 50,000 new jobs for the LeedsCity Region as a whole The Leeds City region has produced below average employment over the past 30 years but in their Strategic Economic Plan they envisage well above average growthin the next 15 years. This is extremely optimistic given that the current UNEMPLOYMENT rate in Yorkshire is 4.3% which is the second highest of any region in the UK and is currently increasing. If Calderdale's economic growth was more accurate, there would be no need to destroy precious Greenbelt land. The Council have proposed a number of alterations to its Green Belt boundaries to simply meet an

inflated housing target at the cost of great environmental harm. The NPPF is clear that Green Belt should only be altered in exceptional circumstances through the preparation or review of a Local Plan. Where it is necessary to consider revision of the Green Belt, this review should be robust in its justification for any alteration ; which is critically missing. The critical importance of early and meaningful engagement and collaboration with communities in producing Local Plans, particularly where this involves altering Green Belt boundaries has not been undertaken as the site has been parachuted into the plan-making process during hearing sessions. This constitutes a seriousbreachof procedural compliance. A local pressure group has been set up at the last moment to attempt to deal with these issues locally and has attracted a significant amount of support. However, the community has not been given the opportunity to produce a Neighbourhood Plan. Neighbourhood Plans can be used by local people to positively shape development in their area, including establishing principles for how former Green Belt sites are developed. Summary All of the reasons why these sites were not brought forward at the Publication Draft stage remain just as relevant now. There has been no further assessment of any of the significant constraints which resulted in the sites being filtered at that stage. The only reason for bringing them forward for allocation now is based on a simple exercise of responding to a requirement to increase the housing supply. There is no justification for allocating these sites given the flood zone allocation and evidence of flooding and given the fundamental conflict with the Green Belt Review in 2017. No consideration has been given to the potential to bring forward other sites in the area that do not carry these fundamental problems. No consideration has been given either to the lack of infrastructure available in Greetland to accommodate such a significant level of new housing. The function of the planning system is to facilitate sustainable development that makes a positive contribution to the environment. It is not the role of the Council torecklesslyrelease demonstrably unacceptable sites within the Green Belt to meet a housing target. The Inspector's letter of 16 July 2019 to the Council notes (Para. 14) that "Local Plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits". This is theundoubtedly thecasehere.No sensible phasing options are proposed related to releaseof the most sensitive Green Belt sitesupontherequirement to demonstrate a five-year housing land supplyeven if the release could be justified. It is illogical to allocate Green Belt sites in Flood Risk Zones 2 and 3 for development before brownfield sites are fully exhausted.The immediate release of the site for development is simply not a sensitive approach to the release ofGreen Belt land even if it were to be appropriate. Later, the Inspector asked the Council to review the option of 'the supply of more suitable and available sites elsewhere'understanding this to be an option, however, the further work on the additional sites considered (incorrectly by the Council) to be 'suitable and available' are not, in fact, suitable and, in any case, it has been revealed that this option on all sites on Saddleworth Road, Greetland (identified below) is simply not sustainable and the proposal is unsound. LP0026 - The Gate Farm, Saddleworth Road, Greetland, Elland, HX48NW LP0177 - Land adjacent Ellistones Place, Saddleworth Road, Greetland, Elland, HX4 8NW LP0952 - Land at New Gate Farm, Saddleworth Road, Greetland, Elland LP1625 - Land to the west of, Silverdale Terrace, Greetland, Elland, HX4 8NQ

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

Duty to Co-operate Reason:

Suggested Modifications:

Remove the Green Belt landon Saddleworth Roadfrom the Local Plan; LP0026 - The Gate Farm, Saddleworth Road, Greetland, Elland, HX48NW LP0177 - Land adjacent Ellistones Place, Saddleworth Road, Greetland, Elland, HX4 8NW LP0952 - Land at New Gate Farm, Saddleworth Road, Greetland, Elland LP1625 - Land to the west of, Silverdale Terrace, Greetland, Elland, HX4 8NQ

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610748

Comment ID **HRU1754** Site ref (if applicable): **LP782**

Person ID: **1244211** Name: **Mr Dave Dixon** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

I am unable to comment.

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

Sound Reason:

The infrastructure of the whole area is currently operating at maximum pressure.- The roads are too narrow and too busy, and are used as short cuts between major routes in the area. There is no capacity at the doctors surgeries, the local primary schools are over capacity, there is too much demand on early years childcare (Pre-School). Furthermore, more building/housing in this area will increase rainwater run off into the Calder Valley increasing the already high risk to Lower Valley residents. Even at higher levels, the recent flooding has highlighted that drainage is unable to cope with the current level of housing. This area is semi rural and should remain that way for the health benefits of the residents. Building on greenfield land (especially when brownfield sites are available) is too high a price to pay for our fragile environment, and only adds to urban sprawl.

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 **HRU1766** Site ref (if applicable):

Person ID: **1244224** Name: **mr James Calverley** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

I have to assume that the plan is legally compliant.

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

Sound Reason:

In the revised plan the Local Authority have assumed that the economic and employment growth forecasts in the original plan weresound and have decidedto increase the housing forecast to meet this economic growth. No concrete evidence wasprovided to support the justification and validity of the original economic forecast and housing demand. Guarantees have yet to be provided that funding will be available to provide the necessary infrastructure required to sustain this significant growth and hopefully improve the well being and prosperity of the town. What effect will these new economic zones have on existing older sites in poorer areas. When businesses in the region move to the new zones, it will simply create derelict buildings scattered throughout the region. It's the same situation elsewhere where towns and cities through the country, where they invest in shinynew shopping precincts , only to find that the local stores have moved to the new precinct leaving their old premises empty and run down. Housing Plan? There is no justification for building this volume of new housing on green field when brownfield sites are available and without the supporting infrastructure

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

Duty to Co-operate Reason:

As part of the due process, there have been opportunities to comment during the various stages of the local plan, however all valid comment and argument appear to have been ignoredin favour of the Local Authorities predetermined outcome, which does not suggest a duty to Co-operate. The local plans submitted by Kirklees, for example, will no doubt have have made similar assumptions and calculations on economic development and housing requirements etc. What impact will these neighbouring plans have on each other? What evidence has been provided to support that the necessary consultations have taken place?

Suggested Modifications:

The Local Authority should be re-evaluating its economic and housing strategy to take into account the changing nature of a) climate change b) availability of brownfield sites c) Macro and micro economic dynamics d) ageing population f) demographics g) the effect on Green belt h)the well being of its local population.

Comments:

Additional Evidence Link:

Comment ID **HRU1783** Site ref (if applicable): **LP0766**

Person ID: **1130583** Name: **Mrs Donna Swales** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Councils own assessment has found Upper Lane is not suitable to carry traffic that will be generated by this

site. The village itself has many small lanes that currently cannot cope with the volume of traffic. Addition housing (average of 2 cars per household?) would have a devastating effect. The land covers coal pits and mine openings. There is a serious risk of contamination. Recent floods on Bunney Lane demonstrate the areas current lack of adequate drainage. The proposed site will surely create more flooding. There are mature trees and woodland in the area that would be displaced as their habitat is destroyed. There is a grade 2 listed stonewall that would be destroyed - surely this is of historical significance. The site is regularly used for horse shows. This would be a great loss to the community. The local doctors surgery would not cope with the influx of these new residents. Where would the additional children attend school?

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

Duty to Co-operate Reason:

Unknown

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1793** Site ref (if applicable):

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 CiI 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. They 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:

allocate LP1171 as a New Housing Site

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610210

Comment ID **HRU1858** Site ref (if applicable):

Person ID: **1246207** Name: **nikki stocks** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

I'm objecting to the local plan because of flooding problems. These need to be sorted out before any one dies. Since 2015 the area that I live in has lost five acres of flood plain zone 3 raised with imported soils levels up to 10ft above the original level. I now personally flood in my home every time it rains. This experiment has failed miserably learn the lessons please don't do this elsewhere in Calderdale the mental health services don't know how to help. They are trying, it's an invasion into your home that causes total destruction of mind body and soul then thieves your belongings. How can you possibly allow the building on any more flood plains. Calderdale is full tell the Government the residents will back you up. Be honest with us.

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 **HRU1865** Site ref (if applicable):

Person ID: **1246253** Name: **Mr Fraser Tomlinson** Organisation: **Environment Agency**

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:

Calderdale Local Plan Stage 2 - Public Consultation Thank you for consulting us on the Housing Requirement Update and Potential Supply document as part of your local plan examination. We have reviewed the following; ï,· Calderdale Local Plan - Housing Requirement Update and Potential Supply, dated January 2020 Based on our review of the above document, and its supporting documents we wish to make some general comments regarding site allocations, but also some site specific comments. Recent flood events Given the recent flooding events in the Calderdale district we would advise and question whether the proposed site allocations, predominantly for more/highly vulnerable uses, but also less vulnerable uses, have been screened further to ensure that any proposed allocations have not been effected to a degree that would cause issues for the LPA in terms of deliverability that could potentially undermine the proposed allocations. Hebden Bridge Flood Alleviation Scheme The Environment Agency is currently developing a flood alleviation scheme for Hebden Bridge. Planning applications are expected to submitted in autumn 2020, with construction anticipated to begin winter 2020/21 and continue through to spring 2023. Works will be occurring at various locations across the town centre during this time. The current scheme proposals can be viewed at http://www.eyeoncalderdale.com/hebden-bridge-flood-alleviation-scheme. To ensure that Environment Agency and third party projects can all be delivered as efficiently as possible, it is advised that the Environment Agency is contacted to discuss any proposed construction work which may fall within the scheme area and within the above timescales. The Environment Agency can be contacted at HebdenbridgeFAS@environment-agency.gov.uk. Sequential approach In our previous responses to the local plan, we highlighted the need and evidence requirements for sites to be screened using the Sequential approach, demonstrating that this approach has been undertaken and that any decisions made abide by the Sequential approach. See below NPPF and PPG references for clarification. NPPF Paragraphs 155 to 161 of the NPPF make clear that -“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere."“All plans should apply a sequential, risk-based approach to the location of development ; taking into account the current and future impacts of climate change ; so as to avoid, where possible, flood risk to people and property."“The aim of the sequential test is to steer new development to areas with the lowest risk of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding."PPG The Planning Practice guidance ; flood risk and coastal change makes clear that the -“Application of the sequential approach in the plan-making process, in particular application of the Sequential Test, will help ensure that development can be safely and sustainably delivered and developers do not waste their time promoting proposals which are inappropriate on flood risk grounds."“A local planning authority should demonstrate through evidence that it has considered a range of options in the site allocation process, using the Strategic Flood Risk Assessment to apply the Sequential Test and the Exception Test where necessary."We would like to see evidence of how these sites have been considered as part the Sequential Test and Site Assessment methodologies. Sustainability appraisal Reviewing the sustainability document we see flood risk and sequential approach have been referenced in the following ways; -“SA 7. To reduce the risk of flooding and resulting detrimental effects on people and property? The impact is uncertain, as although new development is likely to increase run-off rates, there are opportunities through the water management and flood risk policies to secure sustainable urban drainage systems."“SA13. To ensure efficient use of land? On a whole, there would be a positive impact against this SA objective, due to the priority given, through the sequential approach, to the use of previously developed land. There would also be a positive impact in relation to the use of high-density mixed use developments and in reducing the amount of derelict and degraded land. (Positive)"Again, we would like to see evidence of how sites have been considered in terms of flood risk impacts and as part the sequential test and SA process to ensure deliverability of

updated requirements. General comments ; site allocations We are pleased to see the allocations generally identify site constraints, for example flood risk and contaminated land. Where this is concerned the site allocations then detail necessary reports required and site specific considerations. This includes for example FRA and contamination reports with specific considerations including hydrological assessment, site specific mitigations etc. We would suggest that to make clear the requirements relating to the deliverability of site in relation to flood risk these should include, but not be limited to; ï,· Following a sequential approach to the layout of the site ; i.e. locating development in areas of least flood risk. ï,· To include the requirement of site specific FRA ï,· To include the potential requirement of flood risk hydraulic modelling ï,· To specify for sites contained in flood zones 2 and 3 that any more or highly vulnerable uses may not be permitted on the ground floor. ï,· Emergency Access and egress plans must be provided to the LPA for consideration and agreement with their emergency planners. ï,· Specific consideration being given to impacts from historic flooding, such as recent flood events in Calderdale. These comments are likely to apply to all sites which are impacted by flood risk.Please also see the following additional site specific comments following our assessment of existing and additional proposed allocation sites; Mixed Use Sites LP1123 - Kinnaird Close, Elland Site is located in flood zone 2 mostly ; Sufficient FRA etc. will be required LP1088 - West Vale Works Flood zone outlines may be mis-aligned. The watercourse is an ordinary watercourse(not main river). Site specific Hydraulic Modelling and FRA may be required. LP0922 - Former Hebden Bridge Fire Station The above generic points should be applied. The proposed Hebden Bridge FAS may need to be considered in this location. LP0573 - Land adjacent Mill Royd Street Site specific Hydraulic Modelling and FRA required. No more vulnerable or highly vulnerable uses on the ground floor. Emergency Access and egress plans must be provided to the LPA for consideration and agreement. LP0327 - Land off, Halifax Road, Todmorden We understand this site may have been impacted by the recent flood events. Site specific Hydraulic Modelling and FRA required. No more vulnerable or highly vulnerable uses on the ground floor. Emergency Access and egress plans must be provided to the LPA for consideration and agreement. Housing Sites LP0571 - Site to the rear of 9A, Birds Royd Lane, Brighouse The above generic points should be applied. Topographical surveys may be required to inform FRA. LP1180 - Old Lane Dyeworks, Old Lane, Halifax The above generic points should be applied. Surface water flood risk to be considered by LPA. LP1224 - Land North of Meadowcroft Lane, Sowerby Bridge We understand flooding from river ryeburn effected this area during the recent flood events. Site specific Hydraulic Modelling and FRA may be required. No more vulnerable or highly vulnerable uses on the ground floor. Emergency Access and egress plans must be provided to the LPA for consideration and agreement. LP0659 - Land rear of 302, Halifax Road, Todmorden We understand this site may have been impacted by the recent flood events. The above generic points should be applied. LP0177 - Land adjacent Ellistones Place The above generic points should be applied. Site specific Hydraulic Modelling and FRA may be required as the site is effected by an ordinary watercourse (not main river). (See attachment)

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/5628156

Comment ID **HRU1917** Site ref (if applicable):

Person ID: **1246472** Name: **Jon Heyes** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

We strongly disagree with the local plan on planning grounds because there is a complete lack of an infrastructure strategy to suppor any number of houses. We also strongly disagree with the proposal (b) that 'the Director, Regeneration and Strategy be given delegated authority to make any typographical or presentational/format changes to the Submission Draft Local Plan to address any errors and/or improve clarity prior to the start of the publication period'. This is simply not locally democratic. All changes need to have local democratic control by local residents.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1918** Site ref (if applicable):

Person ID: **1246473** Name: **Janet Heyes** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

We strongly disagree with the local plan on planning grounds because there is a complete lack of an infrastructure strategy to suppor any number of houses. We also strongly disagree with the proposal (b) that 'the Director, Regeneration and Strategy be given delegated authority to make any typographical or presentational/format changes to the Submission Draft Local Plan to address any errors and/or improve clarity prior to the start of the publication period'. This is simply not locally democratic. All changes need to have local democratic control by local residents.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1968** Site ref (if applicable):

Person ID: **1116260** Name: **Mrs Sarah Tindal** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

There are still significant concerns about the true availability of the funding that Calderdale are relying on to make much of the supporting infrastructure happen. The junction 24a has no future funding from any source and is unlikely to go ahead. If this is the case, what contingency plans do Calderdale have to deal with the road and transport impacts of the LP development? Funding coming from WYCA is not sustainable and history provides evidence that the Authority has over programmed and pulled back from many projects. Again, how can Calderdale rely on this funding? What contingency plans have they got to make sure the Local Plan is realistically sustainable even in light of economic changes and funding uncertainties?

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5632237

Comment ID **HRU2064** Site ref (if applicable):

Person ID: **956208** Name: **Mr Clive Booth** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

The objection form is far too complicated for normal folk to deal with , there are 56 objections, and I suspect 5000 more who cannot deal with the paperwork , You will in fact base your decisions on erroneous information,May I suggest that you invite the people of Greetland and district to submit a simple yes/no form through the council letterbox , thus you would get a more realistic view from the citizens who are affected,

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:

Comment ID **HRU2065** Site ref (if applicable):

Person ID: **844298** Name: **Cllr Howard Blagbrough** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

I have had a large number of residents contact me, not only with reference to the original local plan submitted but about the decision to increase the umber of houses required, rather than adjust the employment figure accordingly. A number of residents are very disappointed that their previous comments about the lack f infrastructure have gone unheard. The amended plan continue to cause great concern ; our roads cannot cope with the existing volume of traffic. This morning there was a small amount of snow, this somehow ground the traffic to a halt with nothing moving at all. The controlling group on Calderdale Council have just put in an amendment to increase their budget for emergency climate change ; (this will be mainly used to tackle issues of flooding) so therefore they acknowledge that there is a problem locally. The large number of houses planned with the additional sites included, causes me more concern ; these are planned in one of the poorest air quality zones ; surely we need to ensure that this is improved prior to proposing a built up area becomes even more polluted. I wish to feed in my comments with reference to the amendments to the Local Plan. I have previously made various comments about the disproportionate number of houses planned for the Brighouse area and I am disappointed that these comments have had no impact on the process. Instead I see that there is to be additional houses within the Brighouse area.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2125** Site ref (if applicable):

Person ID: **1246860** Name: **Mr Edward Greenwood** Organisation: **Treasurer & Spokesperson Greetland Norland and West Vale Neighbourhood Plan Committee**

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

I submit that the Local Plan is not legally compliant in the following circumstances: That reference to the Town and Country Planning (Local Planning)(England) Regulations 2012 Part 6 Sec18 (1) and (2) in that the Authority have not shown evidence that they have complied with the requirement to inform in the preparation of the plan

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

Sound Reason:

In the matter of soundness of the Local Plan, I submit that the Authority has significantly understated its density allocations and that the Corporate Lead has not addressed this issue as promised at the termination of the Stage 1 hearing. It is stated that the density shall be a minimum 30 per hectare yet there is an instance where this is less. Also the Local Authority's Director of Regeneration stated in his report that the update cannot change except for 'typographical errors and presentation in order to give clarity' yet on the 20/1/2020 a substantial change in developable area and residential capacity was made. The Corporate Lead also stated at the termination of the Stage 1 hearing that the subject of the Aspirational Economic Growth would be addressed. There is no evidence that this has taken place in this update despite evidence that the relationship between Economic growth and Housing is tenuous and that the Growth rate is not supported by nationalal available datasets.

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

Duty to Co-operate Reason:

Suggested Modifications:

That this update is recinded and it be merged into the original Local Plan so as to present a whole document and notice of such to be compliant with the Town and Country Planning (Local Planning) (England) Regulations 2012 Part 6 Sec18 (1) and (2). That the density calculations be re-assessed in line

with current development practices. That the Aspirational Econometric Growth be re-visited using national data information on productivity and not modelling of housing requirement and jobs.

Comments:

Additional Evidence Link:

Comment ID **HRU2160** Site ref (if applicable):

Person ID: **1138084** Name: **Ms Melanie Lindsley** Organisation: **Planning Liaison Manager The Coal Authority**

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 REPRESENATION As we provide the LPA with downloadable GIS data in respect of Development Risk and Surface Coal Resource plans we assume that all potential site allocations have been assessed against this data in order that coal risks/constraints are identified at an early stage in the process. Based on this, and due to the resource implications, we do not make detailed comments on individual sites proposed for allocation. On the basis of the above I can confirm that we have no specific comments to make on any of the additional new sites or the revised 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/5634157 ; http://calderdale-consult.objective.co.uk/file/5634162

Comment ID **HRU2218** Site ref (if applicable):

Person ID: **1130111** Name: **Mr Nigel Holden** 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 FOR FULL REPRESENTATION Please find below my comments on the latest consultation on the local development plan. The Planning Inspector has highlighted a numbers of concerns and contradiction in the first stage of the inspection process, and has written to Calderdale Council asking for clarification of the contradiction between Calderdale's economic ambitions for the area and its housing plans. I am not surprised that she is raising questions at the first stage and this somewhat reflects the fact that the local development plan has been poorly managed by the Council. The whole process is late, consultation has not been meaningful (short, late, over summer holiday periods, incomplete evidence) and the plan in my opinion, is not evidence based nor therefore sound. Whilst clearly a sensible long term plan for both employment and extra housing is to be welcomed for Calderdale, an ill-considered plan is not. The Local plan is flawed economically. The balance between employment ambitions and housing does not make sense ; even now after Calderdale has issued new proposals. Would the Council please consider the following: Why are you not consulting on the 'Economic Plan' before considering the housing need? This consultation assumes that the economics plan is accepted for Calderdale. It is not. The original consultation for the Local Plan included a draft Economic Land Survey. This was incomplete that it was not signed off or agreed by the Council. If this is to be used as the fundamental building blocks for the development of Calderdale and accompanying housing plans then surely this need to be rigorously reviewed, assessed, challenged and consulted on? Why has this not been put out for consultation? Are the economic growth aspirations realistic? It is difficult to assess the accuracy of the Calderdale's economic growth aspiration for the reason highlighted above. What I do know from my involvement in business and the local community raises serious doubts in my mind ; particularly around the proposed plans for the enterprise park at Clifton in Brighouse. Firstly, there is 1.5 million square feet of enterprise space vacant within 3 miles of the proposed site? This is an awkward sloping sites, which will take more money to develop than other location and can only accommodation smaller units. Why would businesses outside Calderdale come to this site? The argument that the sites will attract business from within Calderdale is also questionable. 88% of Calderdale business employs 5 people or less. Enterprise zones would be aimed at organisation outside Calderdale, thereby not creating new jobs in the Borough. Alternative large employers from within Calderdale might move from other locations (avoid flood risk etc..). This seems like economic madness for the Council to be promoting as I understand this would generate business rates income for the West Yorkshire Combined Authority (WYCA) whilst losing council tax income for Calderdale? It would also creating economically deprived areas within Calderdale if job and housing moved too. What would happen if everyone moved from Mythomroyd? I would also question that economic enterprise development outlined in Calderdale's plan will generate benefits for Calderdale (or indeed drive full demand for local housing). I understand that approximately 40 ; 50% of working residents in Brighouse work outside Calderdale. I for example work in Manchester, my wife and daughter both work in Leeds. Do the models accurately predict incoming travel and ignore outward commuting in housing demand projections? Why has the economic land requirements changed? Can Calderdale clarify why the area of economic land required in the plan has changed? Earlier information suggested that 46 hectares was sufficient. The Local plan then increased this to 73 hectares out of identified land of 111 hectares. Why has this increased so much? If so much land is available for development is the Clifton Enterprise zone necessary? If this Enterprise zone really an excuse to open up the wider Thornhill's housing development and therefore not economically sound? Where is the money coming from? It is clear from the plan and submission made at the first stage of the planning inspection that there is not a full economic plan behind the delivery of the proposed garden village at Thornhills. Developers themselves contradicted the Council about the time required to deliver the development. Council Officers were unconvincing that they has the finance in place to support the development with the vital infrastructure investment. Has the Council got a fully funded business and investment plan for developing both the enterprise zones, homes and supporting infrastructure? Recent budget submissions suggest that the Council & WYCA are under severe financial

pressure. Motorway investment looks to be dead? Highways England confirmed in writing that J25 M62 junction is at maximum capacity, and WYCA has confirmed that Â£18.5m is required to fund junction 24A. Their latest budget also confirms that they have no plans to spend anything between now and at least 2027/28? How is this a sustainable development plan when you are proposing so many houses around south East Calderdale ; including Brighouse, Elland, Greetland, & Northowram? Mismatch between houses and growth The inspectors has quite rightly pointed out the mismatch between the Local plans economic development aspiration and the number of dwelling. The Council could have reduced the economic aspiration to match the housing or increase the housing to match the economic aspirations ; noting my comments on the accuracy of these plan anyway. Uniquely, they have chosen to increase dwelling but not in-line with the economic growth?? They have also suddenly found additional sites for homes (again in South East Calderdale) from small brownfield sites ; previously discounted for example 200 more houses at Miln Royd ; yet again in Brighouse. The economics of growth and its financing are questionable. Now this approach highlights that other brownfield sites are available. If we had realistic economic growth plans (difficult to say without full disclosure & consultation), sensible associated dwelling numbers, would we be able to deliver a meaningful local plan using just brownfield sites and thereby reducing or eliminating the need to develop much if at all at sites such as Thornhills? The plan is very questionable on the grounds of Sustainability ; Climate change, flooding, traffic emissions Calderdale Council has recent declared a climate emergency asking for regional, national and global action of carbon emissions. With just a few week they have issues a local develop plan to build (in some case on green fields) thousands of new houses and businesses. Whilst I accept that some development will always be inevitable, this seems to be rather contradictory to their own declared policy position on sustainable development. Given a chance to review the plan by the inspector ; they chose to build more houses. Without proper infrastructure investment, this will add to existing traffic and car exhaust emissions around south east Calderdale. (Brighouse is on an official emission hotspot with NOx emissions exceeding health guidelines). Monitoring of the Council own traffics submission / modelling was proven to be inaccurate and not to national guidelines (independent traffic monitoring by the Clifton Neighbourhood forum and submitted to the council during consultation). This led to Calderdale admitting the flaws and committing to re-do the work. Recent flooding in Brighouse (see photo's below) has again highlighted the flood risk associated with the area. Extension building in the area would only exacerbate the issue around Clifton Common, Clifton Beck & the Wakefield road area. What is this situation going to be like when we have further climate change and heavier downpours? Again the Council work in this area looks to be flawed and rushed through. Summary This plan look to be fundamentally flawed economically. Changes look to be geared around ensuring the development of Clifton enterprise zone despite its obvious challenges and ensuring the retention of the garden village at Thornhills. The economics and financing are unclear and the latest buildability / development plan looks completely unrealistic. The plans do not appear to be sustainable with further traffic issues, flooding and emission problem a distinct possibility. It does not feels to be a strategic plan backed by facts and evidence but a road to piecemeal development at any cost. They appear to have decided on what it is they want to do and are then working really hard to find evidence to support it. Fortunately the gaps are obvious and I would suggest that the Council revisits its plan and the Inspector challenges them ; perhaps holding them to the latest 2019 Strategic Planning framework the Council clearly wanted to avoid

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/5634924

Comment ID **HRU2219** Site ref (if applicable):

Person ID: **1237802** Name: **Mrs Janet Belfield** Organisation: **Sports England**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

THIS COMMENT WAS RECEIVED AFTER THE CLOSURE OF THE REPRESENTATION PERIOD. Thank you for your consultation on the housing requirement update and potential supply consultation. Sport England has no comments to make in respect of the change to the housing requirement figure, but an additional number of homes would require the Council to consider additional needs for sport and recreation facilities, including pools, halls and sports pitches, from an increase in population. Should you require any advice in relation to a Playing Pitch Strategy, Built Facilities Strategy; or Sport England's Planning Tolls including the Sports Facility Calculator and Playing Pitch Calculator do not hesitate to get in touch.

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 **HRU2220** Site ref (if applicable):

Person ID: **1179095** Name: **Mr Victor Cooper** 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:

Once again the Council have been forced to AMEND the CHANGES to the Local Plan submission. This must underscore to the Planning Inspector that the Council have quality issues in their ability to undertake such an important and controversial exercise. If the cannot get the administration and mathematics correct,

what confidence does it build in the ability to carry out the task with due diligence and fair process? The uncovering of two mistakes is further grounds that the Planning Inspector should demand a further scrutiny of the submission in its entirety.

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 **HRU2282** Site ref (if applicable):

Person ID: **1246968** Name: **Mr Javid Bashir** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

Please accept these comments as official representation for the Local Plan. The consultation process for the Local Plan has been well on its way for several weeks and the deadline for comments and representation is 5pm on 24th February 2020. The 'current version' of the local plan was approved by Calderdale Council in October 2019 and is different from the one agreed in 2018. This current version which includes building sites on flood plains and green belt spaces and is a serious concern for theresidents of Calderdale. There has been a major setback to this process - namely Storm Ciara and Storm Dennis where swathes of land, properties and public spaces have been ravaged. This is what has been flagged up as the third flooding event in 8 years and it won't be the last. Residents across the borough of Calderdale have been affected. This petition is being set up to demand the consultation process be temporarily suspended with a view to providing more time for comments and revising elements of the local plan. Some developments that have been approved need to be revised to account for the events of the recent flooding. Many residents that have been affected by the flooding have not had the opportunity to seek advice, make representation or comments. The residents deserve to be heard. At the time of these comments the petition (https://www.change.org/p/calderdale-council-suspend-the-local-plan-for-calderdale)has received 450 signatories and the petition will be kept open.

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 **HRU2291** Site ref (if applicable):

Person ID: **1185621** Name: **Clifton Village Neighbourhood Forum** Organisation: **Clifton Village Neighbourhood Forum**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Please see attachment.

Do you consider the plan to be Sound?:

Sound Reason:

Please see attachment.

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

Duty to Co-operate Reason:

Please see attachment.

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5635643

Comment ID **HRU2314** Site ref (if applicable):

Person ID: **228336** Name: **Yorkshire Wildlife Trust** Organisation: **Yorkshire Wildlife Trust**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

See attachment for 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: http://calderdale-consult.objective.co.uk/file/5636156

Comment ID **HRU2315** Site ref (if applicable):

Person ID: **897896** Name: **Mr Merlin Ash** Organisation: **Natural England**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

THIS COMMENT WAS RECEIVED AFTER THE CLOSURE OF THE REPRESENTATION PERIOD. See attachment for 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: http://calderdale-consult.objective.co.uk/file/5636742

Comment ID **HRU2321** Site ref (if applicable):

Person ID: **1182876** Name: **Mr Craig Whittaker MP** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

See attachment for 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: http://calderdale-consult.objective.co.uk/file/5636807

Comment ID **HRU308** Site ref (if applicable): **LP1409**

Person ID: **1242273** Name: **mr Marco Rossi** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

Although I am not a legal expert, i would suggest that your planned residential development would infringe on the serious health and safety of both human life and wildlife. Also, choosing to build on greenbelt land over the vast options of Brown Belt land (which offer incentives to house builders to build on) would also show contempt and and infringement on local human rights in the pursuant of profit

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

Sound Reason:

I hope my points below outlines my extreme concern for this proposed development, and outlines the very reasons why this piece of land is not suitable at all for such purposes. Unsuitable road network ; Wood Lane is a far from a main public road due to its gradient and narrow dimensions. We already suffer from congestion with many commuters using this as a cut through from the likes of Fountain Head Village. The proposal to increase the number of houses and therefore residents who then own cars, makes no sense and would put further pressure on the road network which already endures issues on a daily basis.I have already witnessed first hand many accidents caused by cars due to the unsuitability of the road dimensions is ratio to the volume of traffic Public Transport ; The direct road/route is unsuitable for any form of public transport which means that non car residents would need to travel by foot, a considerable distance to access the nearest bus route Pedestrians ; Following on from point 2 above, there is no existing pedestrian access for current residents, with all parts of Wood Lane offering no pathways or safe routes to access the larger road network. There is also no feasible option of adding in such safe pathways due to the nature of the surrounding area. The proposal to inject more residents in to an already unsafe pedestrian route would inevitably cause accidents and potential harm to human life and well being. I have video evidence taken by my eldest daughter who has narrowly avoided physical harm from approaching cars on Wood Lane due to the poos visibility and lack of pedestrian access, meaning she needs to navigate the road to get home Environmental Impact ; The area surrounding Larch Close and beyond provides welcomed GREENBELT and an element of rurality for the enjoyment of residents, but also as a home to much wildlife which is already seeing a lot of existing re development projects reduce their natural habitat. The direct land behind Larch Close offers grazing for cows and horses; acts as an access route for the deer population; acts as a

bridleway; houses BADGERS, OWLS and other birdlife in the surrounding trees that line the beck. These are only a few examples of such wildlife that would be negatively impacted by these proposed developments Crime ; in an area which has suffered from more than its fair share of ongoing crime, it would be inevitable that providing more housing would be giving the green light for criminals to undertake their unlawful acts on a more frequent basis. More suitable land ; I can still not process how and why anyone involved in the proposed development would think this particular piece of land to be suitable for housing. The land is on a steep gradient, has no direct utilities, no suitable road or transport network, and would surely cost hundreds of thousands to excavate the beautiful greenery before any building works could be carried out. There a many example of more suitable brown land available for re development, on an already existing road, transport and utilities network and without the need for spending hundreds of thousands of tax payers money on excavating and creating a needless development in your proposed area. Examples include: The former school on Keighley Road (near to Beechwood Surgery). Surely it would cost less to demolish the existing site and re build many homes on this piece of land, which already has utilities and has direct access to a major road with public transport literally on its door step St Catherine's School in Holmfield. As per all my points above Former Car Lots on Queens Road, Pellon. This vast land mass has sat derelict for years and is surely is prime for re development. Old Lane (Off Keighley Road) a Former Mill Building and land in excess of 8 acres which is prime for re development These are only a few examples of more suitable land both from a physical re development and cost perspective Furthermore, with all the examples above, would it also make sense to build affordable and social housing in such areas which is made up of a social demographic that requires such housing support and requirements? I hope that by some miracle that the persons involved in this planning process and ultimate decision making, take all of the above concerns as real life examples of why this area of land (behind Larch Close) is ABSOLUTELY NOT SUITABLE for re development as housing. To ignore these FACTS would show a lack of planning and foresight in to the problems that would be caused by such a re development. PLEASE DO NOT PUT THE PROFIT MARGINS OF HOUSE BUILDERS ABOVE THE SAFETY AND CONCERN OF YOUR CALDERDALE RESIDENTS

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

Duty to Co-operate Reason:

Suggested Modifications:

There would be no modification that would make this proposed development of sound judgement and requirement. It must not be approved

Comments:

Additional Evidence Link:

Comment ID **HRU33** Site ref (if applicable):

Person ID: **1240507** Name: **Ms Belinda Darwin** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

I don't know whether this is the correct e-mail address for what I want to say. Which is ---- Don't forget Prefabs for housing. They can be erected quickly and easily. The come with all mod cons. and are insulated. Just what we need in this environmental aware age we live in. They are a lot different from the ones on at Ripponden and they have been there since the second world war. Surely they will be easier to maintain than the council houses which are there now. Just a thought.

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 **HRU41** Site ref (if applicable): **LP0177**

Person ID: **1239517** Name: **Mrs Nada Duckworth** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

Calderdale Council have failed to make the residents aware of the need to submit new objections to the updated Local Plan and the timescales for this. Calderdale Council has a responsibility to rectify this and ensure this is done in a fair, open, honest and transparent way. 1) I attach shocking photos of these fields taken in the Boxing Day floods 2015; as you can see the fields are a 'lake' not a field. Even without any development on these fields the fields were unable to absorb the rainfall causing severe flooding to the area, flooding of Black Brook at the bottom of these fields and into West Vale. Calderdale Council Planning Department has a duty of care to comply with current policy and legislation on flooding i.e "due to recent widescale flooding incidents in the country and the ever increasing threat of climate change new development in flood risk areas would only be when it is exceptionally necessary, and when it does not increase the risk of flooding in the develoment's community or elsewhere". - To build on these fields clearly will cause further flooding to surrounding areas, as already stated there was widespread flooding without any development on the fields and therfore I request that Calderdale Council Planning Department complies with current legislation and removes these fields from the Local Plan as we do not wish to be another Fishlake here in Greetland. Furthermore several months ago Saddleworth Road adjacent to these fields burst as it was unable to absorb the water flow (water constantly comes through the road and has had to be closed off several times due to repairs) on this occasion the road had to be closed off for several days contributing to a car accident on this busy road. These fields are a natural and essential soak off and any building on this land would further increase the flooding in this high risk flood area. - On the last Local Plan these fields were graded as a Class 1 Severe Risk Flood Area (LP0177) and were removed; in compliance with current legislation they should not have been put back on. 2) On the current Local Plan you have listed LP0177 as "green field" - this is not green field this is Green Belt land;

this is misrepresentation. - The Council, in its own evidence, concludes that the overall parcel within which the site is located performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly - I refer to Paragraph 80 of the NPPF . - When I have asked Calderdale Council Planners for a reason why they have put this high flood risk protected Green Belt land back on the Local Plan the only explantion they can give is "developers don't want to build on brown field sites". - This is not an exceptional circumstance and contrary to Central Government white paper. The CPRE also state "The develoment of brown fields sites should be a priority; there are more than enough brown field sites to fullfil the requirement without having to encroach onto Green Belt". I draw your attention to Esther McVey, current Housing Minister's written policy on Green Belt land and quote: "protecting the Green Belt goes beyond protection against development"I refer to the judicial review - Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Councill (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". Money has been obtained from the Woodland Trust and a large number of trees in excess of 1,000 have been planted on Cherry Tree Farm to preserve habitat for the wildlife in this wildlife corridor and aide the Clean Air Policy.

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

Sound Reason:

This site in the existing Green Belt should be removed from the Plan as the exceptional circumstances for its release do not exist. Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: (i) to check the unrestricted sprawl of large built-up areas (ii) to prevent neighbouring towns merging into one another (iii) to assist in safeguarding the countryside from encroachment (iv) to preserve the setting and special character of historic towns (v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The Council, in its own evidence, concludes that the overall parcel within which the site is located performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt but, most decisively, would see the coalescence of Greetland and West Vale and the deterioration of the identity of both places undermining the Council's Settlement Hierarchy. Notwithstanding this, the quantum of housing proposed in and around the site is undeliverable during a single plan period in plan-making terms and unsustainable in infrastructure terms in relation to the capacity of existing highways, schools and local services. We are coming out of the Euroean Union at the end of this month which will reduce immigration leading to a reduction in the amount of new housing required and therefore reduce the need to release Green Belt. There are plenty of brownfiled sites in Calderdale that would enhance the area by development and these are the sites Calderdale Council Planning Department should be targetting thus complying with the current legilsation and Central Govementment policy and I have been advised there are grants available. Furthermore the proposed site does not meet national policy with regards to flooding. Clean Air Policy ; even higher numbers of traffic would cause further pollution in what is already a bottleneck area of high congestion.

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

Duty to Co-operate Reason:

It does not conform to Central Government Policy;it does not conform with current legislation with regard to building on flood risk areas.

Suggested Modifications:

N/A.

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5588691

Comment ID **HRU507** Site ref (if applicable):

Person ID: **1115638** Name: **Mr Tony Perryman** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

I believe the Council in developing its economic argument has failed to explain the relationship between housing need and population. A cornerstone for example in the development of the garden suburbs is the need for the Employment Zone. The employment Zone will if built attract 1300 jobs to Brighouse. But will this development meet the housing needs of the whole Borough? Population and housing have been largely ignored in the local plan. The relationship however between population and housing is two-sided. On the one hand, population change leads to a changing demand for housing. Population growth, and particularly a growth in the number of households, leads to a growth in housing demand. Population decline might lead to a decrease in housing demand. This will, however, only happen in the long run, after not only the number of people but also the number of households has started to decline. The danger of population decline is greatest in remote rural areas and in areas with lower-quality housing. Areas like Illingworth and the top of the valley largely ignored in this plan; the largest housing concentration identified in the plan is the South-East Corner of the valley, which incidentally is where the more affluent population live. At the same time, the supply of housing influences the opportunities for population increase through migration. Adequate housing supply might attract migrants or influence their choice of residential location. So, simplistically if Calderdale improves its economic growth then it follows more homes will be required. This of course depends upon the number of people who decide to buy the new homes. This will be determined by infrastructure and the ability of the chosen area for development to support this potential growth. The plan is dependent upon the finance being available to build the necessary infrastructure. The evidence provided by the Council at stage 1 of the public inspection was vague about whether his funding would available as required, to the point where it was possible to conclude that it wasn't a given. Developers at the public inspection also questioned whether it was possible to build the houses planned within the plan time span. The suggestion was that it would take up to seven years before the developments were commenced. Moreover, the proximity of the Employment Zone to junction 25 of the M62 is likely to attract people who do not live in the area to come and work in Brighouse. Because of specific characteristics of the housing market, the relationship from population to housing is not as obvious as it may seem at first sight. In fact, jobs tend to follow people, rather than that people follow jobs. And also, people do not always want to live where the houses are built. Furthermore, the population in Calderdale is aging and 40% of those living in Brighouse for example work outside the area. What evidence economically is there that supports the need for an increase in housing numbers? The

Councils own figures show that we are an aging population, therefore less people available for work, with a different housing need. Why should the number of people in Brighouse, decide to now work in the town because of the employment zone? Brighouse is a dormitory town with a high level of professionals who work in Leeds and Manchester. The Council assumes that the demand is there for the housing that it proposes to build in Brighouse, Elland and Greetland, because of the proximity of these areas to the motorway. However, it ignores the potential impact that this may have on the rest of the Borough, which may go into population decline in the more rural areas of Calderdale. The local plan does not meet the economic and housing needs of the less well off in the valley. Who need affordable housing, and jobs within a reasonable traveling distance? Developers will want to manage the supply of houses into the market. Why, because, the supply of private housing is partly determined by house prices, together with a number of underlying determinants. In terms of house prices, the relationship between supply and price is positive, with higher prices encouraging supply. Rising prices encourage house builders to construct more housing. If we therefore accept the economic argument being proposed by the Council and the need for more houses because of the projected economic development, the houses will be needed within the time span of the local plan. This is unlikely given the evidence from developers at stage 1 The supply of housing is positively related to house prices, and the supply curve is upward sloping. However, supply is frequently inelastic because of time lags and legal complexities of getting all the landowners aligned. Moreover, the Developers will only want to build a predetermined number of houses per annuum to maintain margin through the management of housing supply. It is therefore unlikely the number of houses built will meet the economic aspirations of the Council. Let me turn to the economic assumptions being made by the Council. There is almost a notion here that planned housing in the local plan can be used as a tool to achieve an even geographic pattern of economic development. When however, the bulk of development is taking place in the South East corner of the Borough. I therefore believe the Council is making the evidence fit its economic aspirations instead of using this evidence to justify what the real housing need is, in Calderdale. The proposed figure in the local plan was probably nearer the mark than the revised figure even albeit the housing distribution is disproportionate. The NPPF introduced the -“presumption in favour of sustainable development"the definition of 'sustainable' has nothing to do with green issues or energy at all. It means one thing: commercially viable. Greenfield sites are being favoured by developers because they are cheaper to exploit than brownfield sites, which have much higher transaction costs. The Public Inspector has asked the question about the balance between the housing numbers and economic aspiration, and lo and behold we find brownfield sites being discovered capable of development. This is despite the council declaring that there were no more viable brownfield sites. The question is, why did the Council get the housing calculation wrong and why have they provided the following numbers which do not make mathematical sense. Options Housing Per year Economy extra jobs/15 years Notes Plan 840 10,318 Local Plan 2019 1 840 6441 2 910 7791 3 1040 10,318 4 997 ? (Approx. 9900 extra Jobs)) Options Housing Extra Jobs / 15 years Plan 840 10318 4 997 Not stated (9,900 new jobs) The concern here is that the Council still cannot get their statistics to make sense. This brings into question their ability to truly forecast the economic needs of Calderdale, which in turn suggests the housing figure is not accurate. Why should we be expected to accept their argument, therefore? The Council were posed a simple proposition either your economic aspirations are too great, or your housing numbers are too low, which is it? The decision they have taken is to increase the housing allocation. I struggle to see that they have considered fully the implications of this decision. The council will struggle to build the number of houses required within the timeframe, it is not a given that they will get the investment required for the needed infrastructure and they have not provided sufficient evidence to support their economic aspirations.

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

Duty to Co-operate Reason:

I believe the council have not cooperated sufficiently with bordering local authorities on the cumulative

effective of all the development taking place. The industrial and housing development taking place in Kirklees will have a significant impact upon Brighouse and the surrounding areas. There will be significant increase in traffic flowing through Brighouse and Junction 25 of the M62. I do not believe sufficient planning cooperation has taken place to mitigate the impact of the increased traffic or reduction in air quality that is likely to occur.

Suggested Modifications:

I believe there should a full analysis of all the economic needs of Calderdale and a plan devised that meets those needs

Comments:

Additional Evidence Link:

Comment ID **HRU525** Site ref (if applicable): **LP0026**

Person ID: **1241893** Name: **Carol McCambridge** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

The Local Plan is NOT legally compliant for the following reasons: The majority of local residents have not been informed on what is intended to happen in the area over the life of the Plan, exactly what areas it will affect, when it is due to take place, or how long it will take to be delivered. Furthermore, the whole process has been made extremely difficult for people, especially those with no experience of online platforms, such as Calderdale's online objection platform - which is Calderdale's preferred method of objection. Building in this area will run a high risk of conflict with some of the UK's rarest animals and the Wildlife & Countrylife Act 1981. The traditional materials, building methods and unmanaged buildings and gardens provide abundant sources of food and shelter for Bats, Great Crested Newts and Roe Deer, whilst also housing Kingfishers, Herons, Foxes, Rabbits, Owls, Ducks, Fish and many other forms of wildlife. Natural habitat in the form of trees, grass and shrubs, many of which can only be found around waterways such as Black Brook will be lost, not only do they provide food and shelter for wildlife, they also assist in preventing the disperse of flood water across West Vale and Greetland. The extra costs from protecting new houses against guaranteed flooding, will have to be factored in, which will increase the cost of these houses, making them unaffordable to the people they are supposed to be housing. 5 Following our withdrawal from Europe, there will be a reduction in the need for housing in West Vale / Greetland. Professional people seeking residency in the UK are targeting City Centre locations, where they can live in close proximity to their workplace to avoid lengthy commutes.

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

Sound Reason:

In terms of its' siting outside of the settlement envelope of the village, scale and design, the proposal would comprise an incongruous and isolated form of development within a location that would be visually discordant with and cause demonstrable harm to the character and appearance of the rural landscape contrary to the requirements of the aims of the National Planning Policy Framework (NPPF) in respect of promoting sustainable development in rural areas and enhancement of the built environment. The

location of residential development within this rural location outside of the settlement envelope of the village would result in an unwelcome intrusion of the built form into an open landscape that would be unsustainable by having a demonstrable and significant detriment upon the openness of this part of the village fringe resulting in an erosion of the views available from both the Public Rights of Way that pass close to the site and local properties. As such, the proposal would be contrary to maintaining both landscape and settlement character.

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

Duty to Co-operate Reason:

It does not conform to current Central Government Policy, high flood risk areas or building on suitable brown field sites.

Suggested Modifications:

In alignment with the requirements of NPPF (Paragraph 133 & 136), alternative brown field sites must be sought to accommodate this proposed development. This Local Plan cannot be amended to be compliant. Building on greenbelt will encourage urban sprawl; with negative impacts such as the loss of farmland and wildlife, increased car use and poor air quality due to the amount of traffic on the roads. Building on greenbelt that is prone to flooding will further drain our emergency services which are already massively overstretched, negatively affect home insurance in the area and cause untold damage to our environment for future generations. Our infrastructure simply cannot cope with this proposal; the local Doctors' Practice and schools are all over-subscribed, roads are in a constant state of disrepair - impacting hugely on daily commuting, local hospitals cannot cope with the current number of patients and all the time our emergency services are being reduced.

Comments:

Additional Evidence Link:

Comment ID **HRU606** Site ref (if applicable): **LP1451**

Person ID: **1174900** Name: **Mr Ian Bull** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

This plan is located on some of the best arable land in the county. It is a delicate ecosystem and flood water sponge for the River Calder. The plans show 2 roads to nowhere. One cuts through a green belt meadow to Woodhouse Gardens and is an area of veteran and notable trees which are registered and protected. Many of these trees have bat boxes. The other road crosses a railway and there have been no plans, designs, costings or arrangements made with Network Rail which make it viable. Without the above, you will have a road to nowhere which makes this plan unjustified - this remains to be the current status.

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

Sound Reason:

Unsuitable access All roads running through Woodhouse are narrow, some tree lined and there are serious traffic congestion and parking issues already. Large vehicles struggle to get through at current levels and hundreds of delivery wagons which bring the materials to the site will have no chance. The air quality is already fowl. Open your front door in peak times and the pollution is terrible and I worry for my family and residents. Delivery wagons, work force and then the extra residents passing through, will make the pollution considerably worse. It is dangerous as it is - would anyone be held to account? Arable Green Belt This is the best green belt arable land in Calderdale and amongst the best in the county. Is it worth destroying? The arable land is graded as the best you can get and is therefore a valuable resource. Alternative brownfield sites are being over looked. All buildings would each require a considerable amount of piling. This would have a massive environmental impact on materials and the production emissions. This also adds a large financial overhead to every building. The amount of water held back and draining is vast. The run off created by hard landscaping would fill most attenuation tanks quicker than they could cope with. Once the tanks are full, it is a green light for all flood water to head straight into the River Calder. The amount of excavation required for the tanks would bring nothing but misery for the wildlife and local residents. Unsuitable access through the plan As mentioned previously, two of the roads within the plan lead to nowhere. Both of these proposed roads are represented by a short blue dashed line in the plan. One of which is the most important road on the site and is expected to cross a railway line. From my experience of Civil Engineering Rail design, this project is going to cost Â£10's millions - who is going to fund this? When will the Network Rail approved design and timetable be available and justified? Without full justification, design, construction approval, agreed timetable and funding; this bridge will never ever happen. Therefore, it must be fully costed and designed before any road is started as without this, the plan is not sound. The other road cuts through a greenbelt meadow which contains many legally protected veteran and notable trees. This area is also a rich bat habitat which are protected. Again, without sufficient viable access routes and complete design, then the plan is not sound and is pure fantasy. Flooding The residents of Calderdale do not need reminding that there are serious flooding issues. Yet again, Calderdale is national headline news. LP1451 is going to make this worse. A previous plan was rejected decades ago, as it was proven that the next town down the river being Mirfield, would be flooded if the land designated LP1451 is built on. What has changed to prove this would not happen again? Many local business have been badly hit by flooding and this plan will make it considerably worse. Public Transport The local train network is already bursting at peak times. I recently had the misfortune of travelling to Leeds by train and I do not wish to attempt the journey again as it was dangerous. At Brighouse, I shared the space between the train doors with 4 people. At the next stop it was 8, then 12 and by Batley, it was 16 with 4 people standing in the toilet. People at Morley complained that this was the third train that morning, that they could not physically access. The buses in Brighouse have to queue and idle like all of the other traffic in the area. On days when the M62 closes, these routes already gridlock. Additional Commuting The plan has a disproportionate amount of new employment proposals for the amount of new residents which would require work. Therefore, the area will force a mass increase in the number of commuters coming in and going out of Brighouse. As mentioned above, the rail network cannot cope as it is, therefore, the proposed plan is not sound. Families attracted to the local being central to Leeds and Manchester will also be moving in, intending to be commuters only. This will also generate more pollution to the already illegal and dangerous levels. An average amount of cars per household will add approximately 1800 cars to this side of the valley alone; which would equate to approximately 5miles of bumper to bumper traffic trying to get in and out of the area. This is residents only and not taking into account, new schools and businesses. 5miles of additional traffic will gridlock the local existing access roads in Woodhouse and drive pollution to levels that do not bear thinking about - who is going to be held accountable if this happens and people become seriously ill?

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

Duty to Co-operate Reason:

The plan does not comply with local and national government policies.

Suggested Modifications:

The land is top grade arable and should be preserved and protected. Flooding, transport and pollution will be major challenges on a regular basis in the future. The only modification to make LP1451 legally compliant, would be to throw it out completely.

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5606075

Comment ID **HRU700** Site ref (if applicable): **LP0026**

Person ID: **1243144** Name: **Mr David Mitchell** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

This propasol of building houses on this land has been very poorly orchstraded & very little consultaion with the local resisents,the shear number of houses proposed is absurd as it will put even more strain on local infrastructurethat is struggling even at this time with roads schools & doctors surgerys that are barley coping now. It would seem that a long hard look at the infrastruture needs to be addressed before any planning decisions are taken & also that brown land sites should be looked at first before even contemplating building on green belt land.

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

Sound Reason:

the plan is not sound due to lack of infrastructure.

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

Duty to Co-operate Reason:

Not enough consultation with local residents & there is brown land areas that could be developed first.

Suggested Modifications:

To take a look at brown land & other derelict areas before building on green belt.

Comments:

Additional Evidence Link:

Comment ID **HRU734** Site ref (if applicable):

Person ID: **1242575** Name: **Mr Alan Rushworth** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

I'm not in a position to comment.

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

Sound Reason:

The Calderdale Local Plan targets for housing reflect the Leeds City Region Economic Strategic Plan, a highly ambitious Plan (too ambitious?) that was finalised four years ago and is now in need of serious revision. The economic climate has changed significantly since 2016 with GDP growth falling, not only within the UK but world-wide. Current economic indicators remain poor and predict only minimal increases to GDP for the next few years. Another factor specific to the UK is Brexit, an issue that arose after the Strategic Plan was finalised. All the indicators, even from the most optimistic commentators, suggest this will have a negative impact on growth in the short term. These factors must reduce the job growth predictions in the Economic Strategic Plan and for Calderdale to continue to believe it will create between 8,000 and 10,000 additional, not replacement, jobs is unrealistic. A reduction in additional jobs will have a knock-on impact to the population growth figures and, consequently, housing needs.

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

Duty to Co-operate Reason:

I'm not in a position to comment.

Suggested Modifications:

Reduce the additional jobs forecast to a more realistic figure and then consider the implications for population growth.

Comments:

Additional Evidence Link:

Comment ID **HRU782** Site ref (if applicable): **LP0075**

Person ID: **1243169** Name: **Mr Iain Crouch** Organisation:

Agent ID: **1243168** Name: **Mr Iain Crouch** Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Further to my previous comment, I would like to add the following: Many of the sites identified in the Draft Local Plan are not developable as they are either on land with unsuitable topography, or within floodplains. The latest flooding gives evidence to this. New private housing needs to be built in areas close to logical, sustainable access routes to existing shopping centres such as Halifax Town Centre. Certain sites currently proposed (for example sites at Clifton) are not sustainable in this respect. This site is developable now, it doesn't flood and it is capable of providing private housing of a design suitable for Calderdale's needs going forward for the lifetime of the Plan.

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

Duty to Co-operate Reason:

Suggested Modifications:

Inclusion of this site

Comments:

Additional Evidence Link:

Comment ID **HRU787** Site ref (if applicable): **LP0968**

Person ID: **1243169** Name: **Mr Iain Crouch** Organisation:

Agent ID: **1243168** Name: **Mr Iain Crouch** Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Further to my previous comment, I would like to add the following: Many of the sites identified in the Draft Local Plan are not developable as they are either on land with unsuitable topography, or within floodplains. The latest flooding gives evidence to this. New private housing needs to be built in areas close to logical, sustainable access routes to existing shopping centres such as Halifax Town Centre. Certain sites currently proposed (for example sites at Clifton) are not sustainable in this respect. This site is developable now, it doesn't flood and it is capable of providing private housing of a design suitable for Calderdale's needs going forward for the lifetime of the Plan.

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

Duty to Co-operate Reason:

Suggested Modifications:

Inclusion of this site

Comments:

Additional Evidence Link:

Comment ID **HRU816** Site ref (if applicable): **LP1407**

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

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

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

Sound Reason:

Since 2016 there has been a marked review downwards of the areas housing needs, which is not recognised in the Council's assessment. The prospects of economic growth that the Council predicts is overly optimistic. Brownfield sites have been mainly ignored, at the expense of one of the few remaining Green Belt areas in Calderdale. The following appear not to have been given due consideration. Flooding Highways Ecology Open Space Housing Services Environmental Health Other factors Green Belt Flooding Please add your comments below: With the extensive building already present on Saddleworth Road, the south side already takes the majority of the run-off of rainwater and springs. The proposal to build over six hundred additional dwellings, the majority being proposed on the south side, will cause a problem for the lower valley and West Vale. Whatever drainage is considered suitable will still direct the water to the lower valley and West Vale. Extreme weather conditions that we now seem to experience has shown how devastating the result can be in Calderdale. Highways Please add your comments below: Saddleworth Road has speed limits ranging from 50 mph, to 30, 20, and back to 30.With blatant speeding in the 30 mph zones, and stationary traffic in the 20 mph zone, at peak times, it is already difficult to navigate. There have been fatalities in addition to other serious incidents. With the prospect of over six hundred additional dwellings and two cars planned per household, Saddleworth Road will become a lengthy car park.There is no prospect of additional employment in the area, so all resident will be obliged to travel to work. Schools are already full subscribed, so would school children be expected to travel to school. Whatever is attempted at West Vale to ease traffic flow, roundabout, slip road, etc., traffic from four directions will still all converge on West Vale. Everyone is also aware that prospects of additional employment in Calderdale is limited, so any new developments on these sites will spawn commuters heading to and from Leeds and Manchester, with both additional pollution and traffic congestion Ecology Please add your comments below: Currently the valley enjoys the presence of; herons, squirrels, foxes, and other wildlife, who share the area, to the benefit of residents. Open Space Please add your comments below: Besides supporting farming, and the existing wildlife, the open spaces are enjoyed by walkers, cyclist, horse riders, and many others. They offer mental and physical wellbeing, dilute pollution, and allow vital recreation and exercise. Once greenbelt/open space is lost it will never be returned. Is this the bequest we wish to leave the next generation? The north side of Saddleworth Road has already been over developed. The area has already had a disproportionate level of building for its size. To turn the whole valley into a housing estate would be a travesty. The existing green belt should be allowed to remain, with efforts being made to fulfil the housing requirements with brownfield development. Environmental Health Please add your comments below: The further addition of possibly 2000 domestic vehicles, which would entail travel to places of employment, education, or social and pleasure, outside the immediate area, would certainly not make for a better environment. Other Factors Please add your comments below: I have found that Calderdale's

publicity surrounding these proposals to have been somewhat limited, and lacking in ensuring complete openness, and robust attempts at consultation with the community. I have found the website difficult to negotiate, and it has on occasion died on me. Calderdale's Local Plan Position Paper reports that there is -"considerable public disquiet over the allocation of land for housing on the south side of Saddleworth Road this disquiet does not seem to be well targeted other than objections to Calderdale MBC"Yes Calderdale MBC should be our first port of call, and if there are other bodies we should -"target"it would be helpful if OUR council made us fully aware of these. I would ask that the Council seriously reviews it's future requirements for housing to ensure that the figures it first submitted are brought up to date. Accessibility Please add your comments below: Access to and from Saddleworth road is difficult. West Vale is a bottleneck, Stainland road from Saddleworth Road, meanders through some single track country roads, and at Ripponden comes out at a busy T junction. Bus services are very limited, with West Vale being the closest hub. Green Belt Please add further details below Green Belt land has been removed from Local Plan proposals in other areas due to the ribbon effect. Because this is relevant to the land at the south side of Saddleworth Road, it should also be removed, otherwise it smacks of discrimination by Planning. On Calderdale's Local Plan in November 2016 the Green Belt survey for this area came out very strongly, and stated to be a -"highly sensitive area"This Green Belt is currently serving it's purpose;- It continues to be farmland for cattle, sheep, and horses. Helps to safeguard the countryside from encroachment and the merging of neighbouring towns. Helps to emphasise urban regeneration. The infrastructure, in respect transport, highways, education, and medical, are totally inadequate for any massive development. Because there are many other areas including Brownfield sites within Calderdale which have not been considered for inclusion in the in the Local Plan, it smacks of discrimination.

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

Duty to Co-operate Reason:

A plan formulated at Cabinet, without wider consultation

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU844** Site ref (if applicable): **LP1407**

Person ID: **1128728** Name: **Mr Vladimir Murawa** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

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

Sound Reason:

The Local Plan is flawed in respect of the following;- Flooding Highways Ecology Open Space Historic

Environment Employment Land Study Business and Economy Environmental Health Other factors Accessibility Green Belt Flooding Because of the many natural springs, together with the direct rainfall, the Saddleworth Road area is subject to flooding. Currently the Green Belt and it's trees south of Saddleworth Road absorb much of the excess water, but the lower fields are class 3 flood plains. If the areas south of Saddleworth Road have the massive development outlined in the Local Plan, filling the whole south side, the consequences for West Vale in terms of flooding are dire, as it will all flow down the valley, whatever drainage system might be planned. Calderdale is well aware of the effects of extreme weather in our area. Sewer Flooding The sewers that runs close in the Black Brook and down Saddleworth Road are already overloaded with combined sewer overflows (CSO) that discharge excess flows into the brook at time of rainfall. The proposed developments will more than double the number of houses connected to these sewer systems.These additional foul flows will almost double the flood volumes on the sewers and nearly double the annual spill volumes from the CSOs which will increase the pollution to the brook.This will have a negative impact on the fish and wildlife in the area.The Environment Agency have a no deterioration policy for CSOs but there are no plans to upgrade the sewer system in Greetland and West Vale to negate this impact. Highways Saddleworth Road carries a number of various speed restrictions along it's length.Varying from 20 mph to 50 mph.Traffic at peak times can often be stationary, and speeding within the 30 mph zones is regularly observed. Fatalities and other serious accidents do occur in Saddleworth Road. The proposal for in excess of six hundred homes in Saddleworth Road, and the planned two cars per household, the additional traffic volume would be horrendous. Limited prospects for employment in the immediate area would mean that the two cars per new household would be travelling through Saddleworth Road at peak times to and from their places of work in either Leeds or Manchester, with no economic benefit to Calderdale. However the effects on the pollution level would be horrendous. Because the local schools would not have the capacity for a further one thousand(approximately) children, would this then mean additional travelling from Saddleworth Road to more distant schools? West Vale is currently a serious bottleneck.Whatever plan is devised to try to alleviate traffic congestion, roads from four directions converge into West Vale, and the massive development proposed will only create a far greater problem. Ecology I believe that the ecology of the area is reasonably -“balanced"The valley enjoys the presence of all manner of wildlife including herons, squirrels, foxes, and other wildlife, who share the area, to the benefit of residents. Open Space Open Space preservation is necessary for the following reasons; To continue to support farming, existing fauna and flora of the area. Allow locals and visitors to enjoy the open spaces, namely walkers, cyclist, horse riders, and many others. Open Spaces offer mental and physical wellbeing, dilute pollution, and allow vital recreation and exercise. Once Green Belt/Open Space is lost it can never be returned. Surely we do not wish to deprive the next generation of what little Open Space we have remaining. A great swathe of Saddleworth Road has already been over developed, particularly on the north side.The area has already had a disproportionate level of building for its size.To turn the whole valley into a housing estate would be a travesty. Efforts should be made to fulfil the housing requirements with brownfield development.The existing green belt should be allowed to remain. Historic Environment The changes to the local areas environment had changed dramatically, and some of the area's historic past has been eroded by the mass urbanisation in the area.We need to preserve what little remains. Employment Land Study The area of Greetland does not have any prospects for meaningful additional employment, meaning new residents would have to travel to places of employment, adding to traffic and pollution problems. Business and Economy Because the area is predominantly agricultural and domestic dwellings, the addition of massive housing development will not change the business prospects or economy of the area. Environmental Health One definition of Environmental Health is -“ Environmental health is focused on the natural and built environments for the benefit of human health, whereas environmental protection is concerned with protecting the natural environment for the benefit of human health and the ecosystem "¦.. -“"¦. Environmental health and environmental protection are very much related" The loss of Green Belt, Open Space together with the addition of possibly 2000 more domestic vehicles, to enable travel to places of employment, education, or social and pleasure, outside the immediate area, would certainly not make for a better protected environment. Other

Factors Other factors I would ask to be considered are; I have found that Calderdale's publicity surrounding their Local Plan proposals to have been very limited, giving the appearance of an absence of complete openness. I do not believe the attempts at consultation with the community have adequate or thorough. Unlike the previous website comments procedure, I have found the website difficult to navigate much less reliable, making it difficult to register comments. Calderdale's Local Plan Position Paper reported that there is -“considerable public disquiet over the allocation of land for housing on the south side of Saddleworth Road this disquiet does not seem to be well targeted other than objections to Calderdale MBC"
Calderdale has also received petitions from the residents of Greetland pointing out their dismay and objections to the initial Local Plan. Perhaps it might be prudent for the Council to review it's more current housing requirements, as a result of changes in national and international situations, together with a brownfield site in West Vale and other areas in Calderdale now becoming available for development. Because the same problems and arguments apply, I would like to add designated areasLP1625, LP0177, LP0026, and LP1407 to my objections. Considering all the areas designated in the current Local Plan for Saddleworth Road, together with the existing development over a long number of years, it would suggest that Saddleworth Road, Greetland appears to have been unreasonably discriminated against, when comparing the areas size for the vast amount of development. The development of brownfield sites should be a priority according to the CPRE, there are more than enough brownfield sites to fulfil the requirements without encroaching into Green Belt. Accessibility Accessibility Access to and from Saddleworth road is difficult.West Vale is a bottleneck, as roads from four directions merge. Stainland road from Saddleworth Road, meanders through some single track country roads, and at Ripponden comes out at a busy T junction.The road is well used by HGVs, servicing Bosch in the valley, Sonoco, and quarries. Bus services are very limited, with West Vale being the closest hub to regular bus services. Green Belt NPPF Section 13 Protecting Green Belt Land Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: 1) to check the unrestricted sprawl of large built-up areas (2) to prevent neighbouring towns merging into one another (3) to assist in safeguarding the countryside from encroachment (4) to preserve the setting and special character of historic towns (5) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Calderdale Council, in its own evidence, concludes that this area of Green Belt performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly.The development of the land would be against all five functions of Green Belt. Esther McVey's (former Housing Minister up to Nov 2019) written policy on Green Belt land quotes:: "protecting the Green Belt goes beyond protection against development"The limited area of Green Belt remaining in Greetland should be retained because; Green Belt land has been removed from Local Plan proposals in other areas due to the ribbon effect. Because this is relevant to the land at the south side of Saddleworth Road, it should also be removed, otherwise it smacks of discrimination by Planning. On Calderdale's Local Plan in November 2016 the Green Belt survey for this area came out very strongly, and stated to be a -“highly sensitive area"It continues to be farmland for cattle, sheep, and horses. Helps to safeguard the countryside from encroachment and the merging of neighbouring towns. Helps to emphasise urban regeneration. Additional comments In regards to highways, education, transport and medical, the facilities are totally inadequate to be able to sustain any massive development. Much of the Green Belt in the Greetland area has already been consumed by housing development over the years, to a disproportionate degree. Work by CPRE suggests that there are enough brownfield sites in Yorkshire and Humberside to keep councils going for 89 years to meet their 5 year housing targets. It would appear that population growth is likely to be amended substantially downward in view of recent European events. The Local Authority should seriously look again at other possibilities.

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

Duty to Co-operate Reason:

Suggested Modifications:

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified where this relates to soundness. (Please note that any noncompliance with the Duty to Co-operate is incapable of modification at Examination).You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. The Green Belt at Saddleworth Road HX4 should be retained as Green Belt, and existing Brownfield sites planned for housing.

Comments:

Additional Evidence Link:

Comment ID **HRU863** Site ref (if applicable): **LP1567**

Person ID: **1243576** Name: **Mr Mark Greenwood** Organisation: **Officer Valley Mill residents**

Agent ID: **1243574** Name: **Mr MW Greenwood** Organisation:

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

Legal Compliance Reason:

1) Increased Road Traffic Park Road is already a congested route, especially during peak hours.With the potential ofan additional 900 vehicles requiring access to travel across Elland Bridge or to A629 sliproad to Halifax, the traffic situation would become untenable.As Valley Mill residents, wealready experience long delays waiting to turn onto Park Road into the extremely heavytraffic flow. There is currently residents-only access with no through traffic to Halifax via Exley Lane, butwith the building of 450 houseson the Park Road side of Exley, this rule would becomeimpossible to enforce, with traffic opting to use this route to Halifax instead of the morecongested Park Road and A629 route. 2) Local Infrastructure From a review of the Plan, there appears to be no consideration given to the localinfrastructure to support the residents of the additional 450 homes.We are very concernedabout the impact of the extra population on local doctors, dentists and schools, whichalready appear to be over-subscribed. 3) Flooding We would challenge the reference on the web site to the proposed building land being aslight slope.The field to the rear of Valley Mill banks quite steeply.In fact,there is a fall of40 metres from the houses at the end of the cul-de-sac off Exley Lane to Woodlands Road.This is comparable to Salterhebble Hill from the traffic lights at the top to the Shell garage atthe bottom!There is, therefore, a riskthat the apartments in our development that arebelow street level would be subject to flooding.In fact, on Sunday 9 February 2020, theyards of the apartments adjacent to Woodlands Road had considerable water ingress.Weknow that when it rains heavily, the company to the rear of the Mill, Colson, floods, andinwinter the field is permanentlywater-logged, with water continuously drainingonto theroad to the rear of Valley Mill.Already, the properties alongside Park Road are unable to secure flood insurance due to theflood risk from the adjacent canal.Building homes to the rear of these properties wouldexacerbate the issue, meaning that these houses risk being flooded from both sides.

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

Sound Reason:

Please find attached a list of 45 individuals who own property at HX59GY & HX59GZ who would be directly and adversely affected by this plan and who object to this planning

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

Duty to Co-operate Reason:

Please find attached a list of 45 individuals who wn property at HX5 9GY & Hx5 9GZ object to this plan.

Suggested Modifications:

None

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5608877

Comment ID **HRU875** Site ref (if applicable): **LP1407**

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

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

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

Sound Reason:

please select from the following options. A text box will appear below for each option selected. The Local Plan is flawed in respect of the following; Flooding Highways Ecology Open Space Housing Services Environmental Health Other factors Green Belt Flooding With the extensive building already present on Saddleworth Road, the south side already takes the majority of the run-off of rainwater and springs. The proposal to build over six hundred additional dwellings, the majority being proposed on the south side, will cause a problem for the lower valley and West Vale. Whatever drainage is considered suitable will still direct the water to the lower valley and West Vale. Extreme weather conditions that we now seem to experience has shown how devastating the result can be in Calderdale. Highways Saddleworth Road has speed limits ranging from 50 mph, to 30, 20, and back to 30.With blatant speeding in the 30 mph zones, and stationary traffic in the 20 mph zone, at peak times, it is already difficult to navigate. There have been fatalities in addition to other serious incidents. With the prospect of over six hundred additional dwellings and two cars planned per household, Saddleworth Road will become a lengthy car park.There is no prospect of additional employment in the area, so all resident will be obliged to travel to work. Schools are already full subscribed, so would school children be expected to travel to school. Whatever is attempted at West Vale to ease traffic flow, roundabout, slip road, etc., traffic from four directions will still all converge on West Vale. Everyone is also aware that prospects of additional employment in Calderdale is limited, so any new developments on these sites will spawn commuters heading to and from Leeds and Manchester, with both additional pollution and traffic congestion Ecology Currently the valley enjoys the presence of; herons, squirrels, foxes, and other wildlife, who share the area, to the benefit of residents. Open Space Besides supporting farming, and the existing wildlife, the open spaces are enjoyed by walkers, cyclist, horse riders, and many others. They offer mental and physical wellbeing, dilute pollution, and allow vital

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

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

Duty to Co-operate Reason:

Suggested Modifications:

The Green Belt at Saddleworth Road HX4 should be retained as Green Belt, and existing Brownfield sites planned for housing, together with land already owned by Calderdale in north Halifax.

Comments:

Additional Evidence Link:

Comment ID **HRU909** Site ref (if applicable):

Person ID: **1106506** Name: **Mr Kelvin Lawton** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

I cannot comment on the legal compliance of the Plan

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

Sound Reason:

I believe that this plan is not sound. Since the Plan was drawn up the current and future potential flooding of parts of the Calder Valley necessitates a full review of the environmental issues of the proposed numerous large scale housing developments in the Lower Valley. Flood risks are highlighted in nearly every proposed development. Where is there an honest and accurate report from the Environment Agency concerning the increased flood risks of these schemes. How can residents be reassured that housing built on fields on the sides of valley slopes will not increase the amount of run off water gong down in to the becks and rivers? Flood prevention measures n the Upper Valley will surely increase the flow of water down stream to already affected communities in Elland and Brighouse, where there are proposed major housing developments. There is currently local and national concern about the flooding risks to communities. This has to be addressed by the Local Authority and the community deserve honest answers about the impacts of both residential and housing developments. Social factors and a decent quality of life should surely be more important than a drive for increased economic growth which Calderdale MBC have assured us is at the heart of the Local Plan

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

Duty to Co-operate Reason:

I do not wish to comment on this aspect of the Plan.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU976** Site ref (if applicable):

Person ID: **1122742** Name: **Mrs Jackie Haley** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

1. The proposed change to the number of houses. So, the council has chosen to increase housing to match the economic growth forecast in the initial plan. Given that economic growth is a fundamental tool used to assess housing needs, I am deeply concerned that there is a lack of information regarding these economic aspirations. Other than the proposed Clifton Enterprise Zone, I am unable to find much information on the other allocated business sites. Surely the residents and existing businesses (particularly in Brighouse)

should be consulted/engaged with to find out what the economic growth needs are before solely using the NPPF model. This model recognises that the relationship between housing and economic growth is complex so therefore in itself is not entirely reliable or accurate. The council has not demonstrated where or how this economic growth is going to be realised. At the council meeting it was stated that the inspector had guided the council to choose the option of increasing the housing to match economic growth, and that she would likely fail the plan if the option to reduce economic growth was chosen instead. Then why did she give them a choice in the first place? Would she really want to delay an already delayed plan only to fail it if her preferred option wasn't chosen? The proposed Clifton Enterprise Zone is based on its proximity to the M62 motorway, and apparently 5 businesses, from within the borough,are wanting to relocate because of this access to the M62. However existing businesses opposite the EZ are already adversely affected/hindered because of the proximity to the M62 and the heavily congested junction 25 Not only might these 5 businesses be disappointed but the council would lose business rates as they are to be paid to WYCA. What happens to the empty premises left by these businesses? Are they just left to go derelict? Good business sense??? Don't think so. The plan to ease congestion around junction 25 by creating a new junction 24a now seems to be a "non starter" and WYCA have confirmed there is no planned spend for this junction between now and 2027/28. 2. Additional sites. My concerns regarding the additional sites mainly relate to the miraculous finding of some brownfield sites that the council claimed did not exist. Why weren't they used in the first place instead of the large expanse of greenbelt sites that are currently being proposed? It brings into question the honesty and integrity of this council and therefore the soundness of the plan. They claim to be committed to "minimising incursion into green belt" but quite clearly they aren't. I strongly suspect there are other brownfield sites available also. The exceptional circumstances used to justify the massive loss of green belt in order to build 2 " garden suburbs" (formerly known as estates) is therefore not valid. Secondly the amount of housing allocated to South East Calderdale is disproportionate and unfair, particularly in Brighouse who stand to lose the biggest proportion of greenbelt. Brighouse does not have much greenbelt to start with. Brighouse only has a very small railway station with limited parking and wouldn't support the planned housing. 3. Sustainability By increasing the housing in South East Calderdale, I believe will only add to the existing road traffic congestion in and around Brighouse. The recent flooding in Brighouse, which will only increase, has given a snapshot of what is to come ,only worse. Yes, other towns suffer very badly from flooding but why condemn another town to the same fate. Has the council allowed for and addressed these flooding issues in the plan? Is there sufficient funding available for flood defences and the necessary infrastructure? If so where is it coming from? 4. Habitat. Obviously the habitat is going to be massively adversely affected and I strongly disagree with the councils view that there is an opportunity to increase biodiversity. How can replacing greenbelt with large housing projects increase biodiversity.? It's just ludicrous and insulting to the residents who put in a lot of effort to protect and sustain wildlife and their habitat. In conclusion I totally oppose the councils plan to increase housing, in fact given the unprecedented situation post Brexit,and increasing occasions of flooding, perhaps they should be considering scaling it back a bit. The council should also be made to provide us with more information regarding their economic aspirations.

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

Duty to Co-operate Reason:

There is no evidence to show that the council have engaged with Kirklees regarding the traffic issues around junction 25.Are they aware of the thousands of houses due to be built at the other side of junction 25, in Mirfield.Presumably Kirklees council are using the same justification of the proximity to the motorway to build their huge housing estates.So two councils both proposing large housing developments close to an already heavily congested motorway junction (25) and Bradford council also building large housing developments around the next junction (26). Smart motorways are becoming dangerous and their continued use is being reviewed. Should these motorways revert back to 3 lanes traffic congestion will

increase. Councils need to consider whether building so many houses near to the motorway is still a viable justification. There is a saturation point and these junctions cannot support the housing.

Suggested Modifications:

Reduce the amount of housing in the South East Calderdale areas and use ALL brownfield sites before greenbelt. The council needs to be clearer about its economic aspirations and the specific business site allocations.

Comments:

Additional Evidence Link:

Main Issues and Council Response

Legal Compliance

Main Issues:

1. Lack of Infrastructure, e.g. schools

2. The Sustainability Appraisal does not consider cumulative effects, nor does it provide any analysis of cost implications.

3. Planned mitigation for proposed developments are not detailed, therefore not possible to reach informed decision regarding the sustainability or viability of sites.

4. Site appraisals lack detail around required interventions, a view on their suitability is difficult to reach without understanding any interventions.

5. As the IDP was not updated at the same time to be sure that interventions are appropriate and can be funded.

6. Council has not challenged the housing numbers from central government.

Council's Response:

1. The Infrastructure Delivery Plan is a compendium of projected infrastructure provision and it helps to ensure that this infrastructure is provided in a timely manner and in a coordinated and sustainable way. It sets out the infrastructure that will support the level of development that is proposed in the Calderdale Local Plan. The IDP is a living document, updated on at least a yearly basis and contains a chapter on healthcare, education provision, utilities and public transport.

2. The SA is part of the Local Plan preparation process and its purpose is to inform the development of the plan; it is not the sole contributor to proposing or rejecting site allocations. The purpose of the SA is to inform the plan preparation process by appraising the Local Plan's Objectives, Policies, and Allocations in relation to their sustainability, establishing their likely impacts, cumulative impacts, and the scope for mitigating any possible negative impacts. The methodology for assessing the impacts was part of the SA Framework that has been developed over a number of years. The SA Framework has been subject to a number of public consultations.

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

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

5. Further work is underway on infrastructure requirements including an update of the Calderdale Infrastructure Delivery Plan, 2019 (EV 42.1).

6. In order for its Local Plan to be found sound the Council must make provision for the housing requirement identified in the SHMA to be either met within the district or in neighbouring districts. As the surrounding authorities have agreed through the Leeds City Region Statement of Common Ground to meet their own housing requirement this latter option is precluded.

Test of Soundness

Main Issues:

1. The use of pre-fabs for housing should be considered.

2. Council has failed to explain the relationship between housing need and population. Will the Enterprise Zone site in Brighouse meet the housing need of the whole borough?

3. Evidence provided at Stage 1 Hearings was vague regarding the funding of infrastructure that would be required to support housing growth. This impacts on the desirability of an area as a place to live, and therefore support growth.

4. Where is the economic evidence that supports the need for an increase in housing? Information regarding level of job growth arising from new housing requirement figure is missing.

5. Council ignored the issue that directing all development to one area, may result in population decline in other parts of the borough.

6. If the Council's argument is accepted that the new homes are required because of economic growth, the homes will be needed in the Plan period, which is unlikely given evidence heard at Stage 1 Hearings.

7. The Council is making the evidence fit its economic aspirations instead of using this evidence to justify what the real housing need is.

8. Why did the Council get the housing calculation wrong and why have they provided figures which do not make sense?

9. Council not fully considered the implications of increasing the housing allocations. Infrastructure funding is not a given, and there is not sufficient evidence to support economic aspirations.

10. The economic circumstances have changed and the Leeds City region Economic Strategic Plan is possible too ambitious.

11. Where is information from the Environment Agency to provide reassurance regarding flooding risk.

12. As a number of brownfield sites have been put forward as additional sites, the Council, in the

Publication Draft plan took an easy option in ignoring the potential of brownfield sites.

13. The level of employment allocations is too high, based on the site size of the Enterprise Zone and the number of expected jobs created.

14. Impact on flooding.

15. Prioritisation of brownfield sites in site assessment process.

16. The level of uncertainty over the impacts of the Plan as assessed in the Sustainability Appraisal is concerning.

17. Guarantees have yet to be provided that funding will be available to provide the necessary infrastructure required to sustain this significant growth.

18. Impact of enterprise zones on existing employment sites.

19. No consideration of re-evaluating the economic strategy. Selective editing of the Inspector's letter has focused on increasing number of homes without considering the second option. It would also be prudent to re-evaluate the economic strategy to confirm the approach is still acceptable and deliverable.

20. The Plan does not respond to the Climate Emergency.

21. The methodologies for site allocations have been applied inconsistently and without adequate weightings. Question methodology for selecting sites.

22. Recognising the impact of flood risk on developing some brownfield sites in the valley bottom, sites within the Green Belt should be development to retain vibrancy and vitality of communities.

23. Addition of mixed use sites is not a viable way of addressing housing need, due to constraints and financial obstacles.

24. Council has not challenged the housing numbers from central government.

25. Environment Agency has stated that, in generic terms, site assessments should make clear the requirements relating to the deliverability of
site in relation to flood risk include, but not be limited to;
- Following a sequential approach to the layout of the site – i.e. locating
development in areas of least flood risk.
- To include the requirement of site specific FRA
- To include the potential requirement of flood risk hydraulic modelling
- To specify for sites contained in flood zones 2 and 3 that any more or highly vulnerable uses may not be permitted on the ground floor.
- Emergency Access and egress plans must be provided to the LPA for
consideration and agreement with their emergency planners.
- Specific consideration being given to impacts from historic flooding, such as recent flood events in Calderdale.

26. The Environment Agency has requested clarification of how sites have been considered in terms of flood risk impacts and as part the sequential test and SA process to ensure deliverability of updated

requirements.

27. Yorkshire Wildlife Trust has raised several concerns regarding consultation comments not being actioned for this and previous consultation events.

28. Natural England have raised several points regarding this consultation.

Council's Response:

1. The use of modern construction methods, which includes prefabricated housing is a potential that the Council is keen to encourage.

2. See EV35 - Strategic Housing Market Assessment, Turley, 2015, EV 36 - Strategic Housing Market Assessment, Turley, 2018 and CC21 – Modelling the economic implications of proposed housing requirement, Turley, 2019.

3. Further work is underway on infrastructure requirements including an update of the Calderdale Infrastructure Delivery Plan, 2019 (EV 42.1).

4. See CC21 – Modelling the economic implications of the proposed housing requirement.

5. This consultation concerns the additional sites to meet the increased housing requirement. For the Plan's overall approach to distribution see EV 51.1 (Site Allocations Assessment Methodology – Publication Draft, 2018). A further document is in preparation to explain site selection in the revisions document (CC39). It is notable that the additional housing allocations are in other parts of the district (than Brighouse). The physical constraints in the Upper Valley area mitigate against substantive allocations in this area.

6. Information submitted by developers since the Stage 1 hearings indicates allocated sites will be built out in the Plan period. Reviews of the Plan, once adopted, will address any delivery issues.

7. See CC21 – Modelling the economic implications of proposed housing requirement, Turley, 2019. The Council is planning to meet its housing requirement as opposed to its housing need.

8. 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.

9. Further work is underway on infrastructure requirements including an update of the Calderdale Infrastructure Delivery Plan, 2019 (EV 42.1). The Council has demonstrated its commitment to meeting its economic ambitions through Policy SD4 of the Local Plan and the associated employment allocations.

10. Economic circumstances will fluctuate throughout the Plan period but the Council must plan with regard to the average over the longer term. The overall ambitions of the LCR SEP are not a matter to be addressed through the Calderdale Local Plan.

11. The Environment Agency has been fully consulted at all stages of Local Plan preparation and their views fully incorporated into policy and site allocations.

12. A number of brownfield sites were not included in the Publication Draft of the Plan due to viability issues. The previously developed sites included in the current consultation document (CC39) are now believed to be deliverable as they are associated with other Council led initiatives.

13. The scale of the employment allocations was discussed at the stage 1 hearings and the Inspector will present her conclusions on this issue in due course.

14. The NPPF makes it clear that 'inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere'. Supported by the Calder Catchment Strategic Flood Risk Assessment 2016 (SFRA), the Local Plan is focused upon managing flood risk from all sources and applying a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change.

15. 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.

16. This issue has been responded to under 'Legal Compliance'.

17. The Local Plan is supported by the Infrastructure Development Plan which sets out the infrastructure requirements resulting from the growth proposed in the borough.
The IDP has been updated to include a table setting out the Local Plan housing trajectory and the provision of critical infrastructure. This table shows the cumulative trajectory; the individual infrastructure projects that need to be delivered by that point in time; funding status; regulatory status; construction status and lead agency/partners.

18. The assessment of future growth in the context of the Calderdale economy is presented in the Employment Land Study (EV1), and the Council considers that the methodology adopted to assess the employment land requirement meets the requirements of National Planning Policy Guidance 2015.

19.The Council's Cabinet agreed the adopted approach, which has been the subject of this consultation, following consideration of different options. (see CC31 Report to Councils cabinet – 14th October 2019 potential modifications to the draft Local Plan following receipt of the Planning Inspector's post stage 1 hearings letter, CC32 Minutes of the Cabinet meeting 14th October 2019, and CC33. Sustainability Appraisal of options

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

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

22. 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.

23. These aspects have been considered in the Site Assessments and Viability assessment reports. However the contributions to the housing supply from the additional mixed use sites will be explored in more detail in a' Mixed Use Sites Capacity Review' to be undertaken by consultants on behalf of the Council prior to the next set of hearings.

24. In order for its Local Plan to be found sound the Council must make provision for the housing requirement identified in the SHMA to be either met within the district or in neighbouring districts. As the surrounding authorities have agreed through the Leeds City Region Statement of Common Ground to meet their own housing requirement this latter option is precluded.

25. Environment Agency comments to be integrated in site assessment summary where appropriate.

26. Clarification of the Council's approach to site allocations in relation to the sequential approach is provided in the Council's Environment Agency Position Note produced as part of the Council's response to PHN3.

27. Yorkshire Wildlife comments have been actioned where appropriate.

28. Natural England comments will be actioned where appropriate.

Duty to Co-operate

Main Issues:

1. Council not cooperated fully with neighbouring authorities on the cumulative effects, including increase in traffic and air pollution.

2.There is no evidence that the Council has engaged with Kirklees Council regarding issues around Junction 25.

3. The junctions of the M62 cannot support the amount of housing coming forward in Calderdale, Kirklees and Bradford.

4. Inadequate public consultation

5. Impact on drainage and flooding

6. Prioritise brownfield land

7. Council has not challenged the housing numbers from central government.

Council's Response:

1. See Submission Document SD 13 Duty to Cooperate Statement Including Statements of Common Ground

(January 2019). Discussions with neighbouring authorities and other prescribed bodies have continued since Submission of the Local Plan.

2. The Council is undertaking a joint masterplanning process with Kirklees Council, and is confident that its on going responsibilities for the Duty to Cooperate are demonstrated.

3. Highways England have stated that there would be no significant impact on the strategic highway network.

4. 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).

5. Issue dealt with under 'soundness'.

6. Issue dealt with under 'soundness'.

7. Issue dealt with under 'soundness'

Suggested Modifications

1. Full analysis of all economic needs of Calderdale, and a plan devised that meets those needs.

2. Reduce the economic aspirations to match current housing at 840dpa number or change the spatial distribution of sites to distribute growth across the borough

3.That the density calculations be re-assessed in line with current development practices.

4. That the Aspirational Econometric Growth be re-visited using national data information on productivity and not modelling of housing requirement and jobs.

5. That this update is rescinded and it be merged into the original Local Plan so as to present a whole document and notice of such to be compliant with the Town and Country Planning (Local Planning) (England) Regulations 2012 Part 6 Sec18 (1) and (2).

Council's Response:

1. The Council believes the Local Plan as submitted, together with the revisions which are the subject of this consultations (CC39), is based on appropriate evidence, and no modification is proposed.

2.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 Strategic Economic Plan (SEP). 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).

The distribution of allocations reflects constraints in the western part of the Borough, notably the Special Protection Area and Special Area of Conservation as well as the physical constraints in the Upper Valley area

mitigating against substantive allocations in this area. For these reasons no modification is proposed.

3. Density is either based on recognised density multipliers or information provided by developers. For mixed use sites the capacities/densities are to be explored in the' Mixed Use Sites Capacity Review' to be undertaken by consultants on behalf of the Council and prior to the next set of hearings. No modification required.

4. The Regional Econometric Model is a complex economic database and impact model for Yorkshire ad Humber, and data in the model consists of historical employment, output, productivity, population estimates and forecasts, and other labour market and environmental information. The Model provides a consistent database which underpins the economic policies of the LEP and other Districts in the Leeds city Region.
No modification required.

5. The statutory regulations for plan making will be adhered to. No modification required.

Document Section: 1 Consultation Arrangements

Representations

Comment ID **HRU1059** Site ref (if applicable):

Person ID: **1122768** Name: **Dr Sarah Vickers** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

There hasn't been adequate notification and consultation of the housing requirement update with local residents. Especially those residents without access to the internet so they may be unaware of the revised housing requirements or of how to comment on the plan. Although the council states that comments can be made in writing or email this information is only obvious once you are already logged into the consultation portal. There are people who would find using the councils consultation portal difficult and confusing to use. When the draft plan was initially produced in 2017 a letter was written to the local residents. This has not been done for these revised housing requirements.

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:

Adequate contact to all potentially affected residents should be made in a form (eg post) that everyone can access. Contact and information about the local plan and the updated housing requirements and how to submit a comment should be supplied.

Comments:

Additional Evidence Link:

Comment ID **HRU2116** Site ref (if applicable):

Person ID: **1139521** Name: **Cllr Sophie Whittaker** Organisation: **Councillor**

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

Issues with the consultation arrangements Before commenting on the main issues pertaining to the consultation, I would like to make the following points about the way this consultation has been arranged and conducted: I was surprised and very disappointed to learn that the vast majority of the businesses in Rastrick, particularly those located on Birds Royd Lane and its surrounding streets (Mission Street, River Street, etc.) were totally unaware of Calderdale's Local Housing Plan and the significant development plans for Brighouse and Rastrick, until this was brought to their attention by a group of active residents (Woodhouse Residents Association). Those who had some awareness of the Plans happen to live in the area and have received literature from Local Councillors. The lack of awareness from businesses was even more surprising given that they are located in the heart of the proposed 5,000+ new residential properties in the Brighouse/Rastrick area, and their close proximity to the largest sites proposed in the Plan - Woodhouse 'Garden Suburb', the Clifton 'Garden Suburb', and the Clifton Enterprise Zone. Following on from the previous point, I am informed that discussions have not been had with existing businesses (who already contribute substantially to the growth and prosperity of the local economy) in an effort to obtain a full and accurate picture of how the excessive employment growth strategy will impact on these businesses. Had these discussions been had from the outset, Calderdale Council may have found that the direction of many existing businesses to increase productivity and efficiency does not align with that of the Council. Calderdale's employment growth strategy and the figures attributed to new employment generated in the area may therefore be different had these discussions taken place. I therefore believe it has been a monumental failure of the Council's to engage effectively with the local business community, identify their needs, and work with them to produce and a positive and meaningful Plan for the area that does not jeopardise their operations and ability to contribute to the Calderdale economy. It came to my attention the week before the consultation deadline that there was a discrepancy in one of the main supporting documents released for the consultation. This document was CC21 -“Modelling the economic implications of the prosed housing requirement ; report prepared by Turley on behalf of the Council, August 2019."One version of the document (the correct one) could be found in the Examination Library, but the document linked on the Local Plan News page on the Council's website, and the document in the Objective consultation were another (incorrect) version. Although the Council confirmed that there were no substantive differences in terms of the outcome of the reports, it is not sound for responders to the consultation to be commenting on the wrong document. The correct version underpins the changes of which responders are making comments. Without the correct evidence document, this could provoke irrelevancy and misdirection in comments. My second concern relates to why the documents different and how they were changed given that the report is a consultant report, not a Council document. It would therefore be highly inappropriate for the Council to change a consultant's report without their prior approval. I hope this is not the case.

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:

Comment ID **HRU2181** Site ref (if applicable):

Person ID: **1243954** Name: **Mr Edward Drury** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

I was not aware of the Local Plan and the significant development proposals planned for Brighouse until now. Furthermore, I only know about this current consultation following an alert from local residents, it is not because of the C ouncil's communication efforts. The planned proposals will have a significant impact on my business and would add to the issues I already experience. It is disappointing that whilst the Council are forging ahead with an excessive employment growth strategy that they have not felt it necessary to discuss these plans with existing businesses to understand the impacts it will have. My business already contributes significant growth and prosperity to the Calderdale economy and in line with current national direction, we are focusing on increasing productivity to strengthen this further. The co uncil's plans will not support this. My main priority is running my business and ensuring its viability. Dealing with day to day operations makes it very difficult to engage with concerns beyond this such as the local plan consultation. Unless information is handed to me directly and is easily accessible it can easily pass me by. The Council appears to have totally failed to recognise the different pressures on the business community and the need to consult according and this is unsound. I would be interested to know how many businesses have actually responded to the plan and what specific efforts the council has made in this respect to gain a meaningful response.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5634612

Comment ID **HRU2217** Site ref (if applicable):

Person ID: **1120427** Name: **Mrs Hazel Jones** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

I wish to object to the current Local Plan as unsound based on the following: The process has been undemocratic. First, Calderdale Council insisted that Clifton Neighbourhood Forum could not include residents from Thornhills - the hamlet most affected by the proposed Garden village proposals and so also excluded from the Forum's Neighbourhood Plan which has been compiled by local people to work with Calderdale during the execution of this plan. This is inherently undemocratic. Secondly in this current iteration, Calderdale have only consulted on the detail of their chosen option and not the choice of options. Calderdale residents have the right to have a view on the balance of growth and development in the Borough and not be presented with details relating to a fait accompli. Lack of evidence. This consultation looks at newMy identified housing sites (having already decided additional housing rather than to balance growth with existing ambitious housing targets). However the fact these new sites have been considered at this stage demonstrates that there has been insufficient rigorous analysis of available locations for housing throughout the Plan. The inequitable distribution of proposed housing particularly in relation to the Brighouse and Clifton area would have been less controversial had there been proper analysis of opportunities throughout the preparation of this Plan. There would not have been the need to propose such a density of new housing in Clifton if appropriate analysis had been undertaken in the first place. In addition, there has been a case made for a need for affordable local housing for Calderdale's ageing population, but there is NO evidence of how this will actually be achieved (as oppose to potential large detached properties. Lack of mitigation. The Local Plan does not sufficiently cover mitigation measures in relation to: impact on local traffic - particularly A643 and access to M62; mitigation measures in relation to air pollution from increased traffic; and most crucially - mitigation measures re potential flooding in relation to building on the higher ground above the River Calder in Brighouse which has been subjected, once again, to devastating floods whilst at the same time the Council and Secretary of State for the Environment (rightly) advocate the importance of catchment management and the need for better land management to mitigate run off. I hope that although I have failed to successfully negotiate the online form, these comments will nevertheless be taken into account as part of continued deliberations.

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 **HRU2221** Site ref (if applicable):

Person ID: **1246930** Name: **Woodhouse Residents Association** Organisation: **Woodhouse Residents Association**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

See attachment

Do you consider the plan to be Sound?:

Sound Reason:

See attachment

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5635134 ; http://calderdale-consult.objective.co.uk/file/5635135 ; http://calderdale-consult.objective.co.uk/file/5635136

Comment ID **HRU2223** Site ref (if applicable):

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

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

SEE ATTACHED FOR FULL REPRESENTATION

Do you consider the plan to be Sound?:

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION

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

Duty to Co-operate Reason:

SEE ATTACHED FOR FULL REPRESENTATION

Suggested Modifications:

SEE ATTACHED FOR FULL REPRESENTATION

Comments:

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

Comment ID **HRU2228** Site ref (if applicable):

Person ID: **1181961** Name: **Mrs Julie Bullen** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

See attached

Do you consider the plan to be Sound?:

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/5635148

Comment ID **HRU2234** Site ref (if applicable):

Person ID: **1184942** Name: **Mr Mark Bullen** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

See attached

Do you consider the plan to be Sound?:

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/5635184

Comment ID **HRU520** Site ref (if applicable): **LP052**

Person ID: **1241893** Name: **Carol McCambridge** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

The Local Plan is NOT legally compliant for the following reasons: The majority of local residents have not been informed on what is intended to happen in the area over the life of the Plan, exactly what areas it will affect, when it is due to take place, or how long it will take to be delivered. Furthermore, the whole process has been made extremely difficult for people, especially those with no experience of online platforms, such as Calderdale's online objection platform - which is Calderdale's preferred method of objection. Building in this area will run a high risk of conflict with some of the UK's rarest animals and the Wildlife & Countrylife Act 1981. The traditional materials, building methods and unmanaged buildings and gardens provide abundant sources of food and shelter for Bats, Great Crested Newts and Roe Deer, whilst also housing Kingfishers, Herons, Foxes, Rabbits, Owls, Ducks, Fish and many other forms of wildlife. Natural habitat in the form of trees, grass and shrubs, many of which can only be found around waterways such as Black Brook will be lost, not only do they provide food and shelter for wildlife, they also assist in preventing the disperse of flood water across West Vale and Greetland. The extra costs from protecting new houses against guaranteed flooding, will have to be factored in, which will increase the cost of these houses, making them unaffordable to the people they are supposed to be housing. Following our withdrawal from Europe, there will be a reduction in the need for housing in West Vale / Greetland. Professional people seeking residency in the UK are targeting City Centre locations, where they can live in close proximity to their workplace to avoid lengthy commutes.

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

Sound Reason:

In terms of its' siting outside of the settlement envelope of the village, scale and design, the proposal would comprise an incongruous and isolated form of development within a location that would be visually discordant with and cause demonstrable harm to the character and appearance of the rural landscape contrary to the requirements of the aims of the National Planning Policy Framework (NPPF) in respect of promoting sustainable development in rural areas and enhancement of the built environment. The location of residential development within this rural location outside of the settlement envelope of the village would result in an unwelcome intrusion of the built form into an open landscape that would be unsustainable by having a demonstrable and significant detriment upon the openness of this part of the village fringe resulting in an erosion of the views available from both the Public Rights of Way that pass close to the site and local properties. As such, the proposal would be contrary to maintaining both landscape and settlement character.

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

Duty to Co-operate Reason:

It does not conform to current Central Government Policy, high flood risk areas or building on suitable

brown field sites.

Suggested Modifications:

In alignment with the requirements of NPPF (Paragraph 133 & 136), alternative brown field sites must be sought to accommodate this proposed development. This Local Plan cannot be amended to be compliant. Building on greenbelt will encourage urban sprawl; with negative impacts such asthe loss of farmland and wildlife, increased car use and poor air quality due to the amount of traffic on the roads. Building on greenbelt that is prone to flooding will further drain our emergency services which are already massively overstretched, negatively affect home insurance in the area and cause untold damage to our environment for future generations. Our infrastructure simply cannot cope with this proposal; the local Doctors' Practice and schools are all over-subscribed, roads are in a constant state of disrepair - impacting hugely on daily commuting, local hospitals cannot cope with the current number of patients and all the time our emergency services are being reduced.

Comments:

Additional Evidence Link:

Comment ID **HRU528** Site ref (if applicable): **LP0177**

Person ID: **1241893** Name: **Carol McCambridge** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

The Local Plan is NOT legally compliant for the following reasons: The majority of local residents have not been informed on what is intended to happen in the area over the life of the Plan, exactly what areas it will affect, when it is due to take place, or how long it will take to be delivered. Furthermore, the whole process has been made extremely difficult for people, especially those with no experience of online platforms, such as Calderdale's online objection platform - which is Calderdale's preferred method of objection. Building in this area will run a high risk of conflict with some of the UK's rarest animals and the Wildlife & Countrylife Act 1981. The traditional materials, building methods and unmanaged buildings and gardens provide abundant sources of food and shelter for Bats, Great Crested Newts and Roe Deer, whilst also housing Kingfishers, Herons, Foxes, Rabbits, Owls, Ducks, Fish and many other forms of wildlife. Natural habitat in the form of trees, grass and shrubs, many of which can only be found around waterways such as Black Brook will be lost, not only do they provide food and shelter for wildlife, they also assist in preventing the disperse of flood water across West Vale and Greetland. The extra costs from protecting new houses against guaranteed flooding, will have to be factored in, which will increase the cost of these houses, making them unaffordable to the people they are supposed to be housing. Following our withdrawal from the European Union, there will be a reduction in the need for housing in West Vale / Greetland. Professional people seeking residency in the UK are targeting City Centre locations, where they can live in close proximity to their workplace to avoid lengthy commutes.

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

Sound Reason:

In terms of its' siting outside of the settlement envelope of the village, scale and design, the proposal

would comprise an incongruous and isolated form of development within a location that would be visually discordant with and cause demonstrable harm to the character and appearance of the rural landscape contrary to the requirements of the aims of the National Planning Policy Framework (NPPF) in respect of promoting sustainable development in rural areas and enhancement of the built environment. The location of residential development within this rural location outside of the settlement envelope of the village would result in an unwelcome intrusion of the built form into an open landscape that would be unsustainable by having a demonstrable and significant detriment upon the openness of this part of the village fringe resulting in an erosion of the views available from both the Public Rights of Way that pass close to the site and local properties. As such, the proposal would be contrary to maintaining both landscape and settlement character.

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

Duty to Co-operate Reason:

It does not conform to current Central Government Policy, high flood risk areas or building on suitable brown field sites.

Suggested Modifications:

In alignment with the requirements of NPPF (Paragraph 133 & 136), alternative brown field sites must be sought to accommodate this proposed development. This Local Plan cannot be amended to be compliant. Building on greenbelt will encourage urban sprawl; with negative impacts such as the loss of farmland and wildlife, increased car use and poor air quality due to the amount of traffic on the roads. Building on greenbelt that is prone to flooding will further drain our emergency services which are already massively overstretched, negatively affect home insurance in the area and cause untold damage to our environment for future generations.

Comments:

Additional Evidence Link:

Comment ID **HRU529** Site ref (if applicable): **LP1625**

Person ID: **1241893** Name: **Carol McCambridge** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

The Local Plan is NOT legally compliant for the following reasons: The majority of local residents have not been informed on what is intended to happen in the area over the life of the Plan, exactly what areas it will affect, when it is due to take place, or how long it will take to be delivered. Furthermore, the whole process has been made extremely difficult for people, especially those with no experience of online platforms, such as Calderdale's online objection platform - which is Calderdale's preferred method of objection. Building in this area will run a high risk of conflict with some of the UK's rarest animals and the Wildlife & Countrylife Act 1981. The traditional materials, building methods and unmanaged buildings and gardens provide abundant sources of food and shelter for Bats, Great Crested Newts and Roe Deer, whilst also housing Kingfishers, Herons, Foxes, Rabbits, Owls, Ducks, Fish and many other forms of wildlife. Natural habitat in the form of trees, grass and shrubs, many of which can only be found around waterways

such as Black Brook will be lost, not only do they provide food and shelter for wildlife, they also assist in preventing the disperse of flood water across West Vale and Greetland. The extra costs from protecting new houses against guaranteed flooding, will have to be factored in, which will increase the cost of these houses, making them unaffordable to the people they are supposed to be housing. Following our withdrawal from the European Union, there will be a reduction in the need for housing in West Vale / Greetland. Professional people seeking residency in the UK are targeting City Centre locations, where they can live in close proximity to their workplace to avoid lengthy commutes.

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

Sound Reason:

In terms of its' siting outside of the settlement envelope of the village, scale and design, the proposal would comprise an incongruous and isolated form of development within a location that would be visually discordant with and cause demonstrable harm to the character and appearance of the rural landscape contrary to the requirements of the aims of the National Planning Policy Framework (NPPF) in respect of promoting sustainable development in rural areas and enhancement of the built environment. The location of residential development within this rural location outside of the settlement envelope of the village would result in an unwelcome intrusion of the built form into an open landscape that would be unsustainable by having a demonstrable and significant detriment upon the openness of this part of the village fringe resulting in an erosion of the views available from both the Public Rights of Way that pass close to the site and local properties. As such, the proposal would be contrary to maintaining both landscape and settlement character.

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

Duty to Co-operate Reason:

It does not conform to current Central Government Policy, high flood risk areas or building on suitable brown field sites.

Suggested Modifications:

In alignment with the requirements of NPPF (Paragraph 133 & 136), alternative brown field sites must be sought to accommodate this proposed development. This Local Plan cannot be amended to be compliant. Building on greenbelt will encourage urban sprawl; with negative impacts such as the loss of farmland and wildlife, increased car use and poor air quality due to the amount of traffic on the roads. Building on greenbelt that is prone to flooding will further drain our emergency services which are already massively overstretched, negatively affect home insurance in the area and cause untold damage to our environment for future generations. Our infrastructure simply cannot cope with this proposal; the local Doctors' Practice and schools are all over-subscribed, roads are in a constant state of disrepair - impacting hugely on daily commuting, local hospitals cannot cope with the current number of patients and all the time our emergency services are being reduced.

Comments:

Additional Evidence Link:

Comment ID **HRU857** Site ref (if applicable):

Person ID: **1241652** Name: **R Graham Maslen** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Presumably the Local Authority is adhering to national or statutory guidance in relation to this consultation. Requiring people who are commenting on these proposals to structure their comments into judgements about legality, soundness and a duty to cooperate may be administratively convenient but it makes it difficult for a lay person (ie. someone who lives in the Local Authority area and is concerned about developments in their area but does not have a professional qualificationin planning and/or an infinite amount of time to undertake all the background reading) to make informed comments. Consultation should be less about bureaucratic niceties and much more about maximising involvement in these important decisions. If I wanted to devise a consultation exercise which would absolutely minimise the number of comments on a proposal then this process would be perfect. Why is there no 'Don't Know' option? That is the option I would tick if available.

Do you consider the plan to be Sound?:

Sound Reason:

The narrowly defined categories in which residents are required to comment (Positively prepared, Justified, Effective and Consistent with National Policy) restrict the grounds on which people may wish to comment. This severely restricts accessibility and involvement. Just because it is 'national policy' doesn't make it right!

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

Duty to Co-operate Reason:

It is not clear in this consultation with whom the Local Authority has a 'duty to co-operate.

Suggested Modifications:

Future consultations should be made much more accessible and comprehensible for ordinary people.

Comments:

Additional Evidence Link:

Main Issues and Council Response

Legal Compliance

Main Issues:

1. Inadequate community involvement.

2. It was not clear whether comments were sought on filtered sites. It was difficult to find information on the rejected sites.

3. Discrepancy in the Turley Report

Council's Response:

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. There was a consultation point in chapter 5 which enabled representations to be made against filtered sites. Information on filtered sites was available through the interactive policies map.

3. The final version of the 'Modelling the economic implications of the proposed housing requirement' report was written and issued by Turley. However, before the final version of any consultant's report is issued feedback is provided by the client. In this instance the feedback was intended to clarify aspects of the report in order to make it more understandable. There were no changes made to the substance or overall conclusions of the report.

Test of Soundness

Main Issues:

Council's Response:

Duty to Co-operate

Main Issues:

Council's Response:

Suggested Modifications

1. Future consultations should be made much more accessible and comprehensible.

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).

Document Section: 2 Introduction

Representations

Comment ID **HRU1487** Site ref (if applicable):

Person ID: **10988** Name: **Mr Anthony Rae** Organisation: **Coordinator Calderdale Friends of the Earth**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

See my comments in paragraphs 1-19 of the attached single response to the consultation. Addendum: There's a one word typo in para.8, with the wrong would in bold. The original This approach to the presentation of the inspector's paragraph 12 - whereby the alternative approach suggested in sentence 6 is simply removed from consideration - runs throughout the consultation documentation. In document C38 'Addendum to Exceptional circumstances for the release of Green Belt Technical Paper', the request by the inspector is misquoted in two ways which will affect consultees understanding of her intention so as to make it appear she was more definitive in simply requesting an increased housing allocation. 'Following the Stage 1 Hearings into the Calderdale Local Plan Publication Draft, the Inspector raised concerns in that it was considered the Plan's provision for housing would not adequately support the employment growth advanced in the Plan. It was suggested that further work would be necessary to assess the implications of housing need and requirement figures which align more closely to the Plan's economic strategy.' FOE emphasis should read 'Following the Stage 1 Hearings into the Calderdale Local Plan Publication Draft, the Inspector raised concerns in that it was considered the Plan's provision for housing would not adequately support the employment growth advanced in the Plan. It was suggested that further work would be necessary to assess the implications of housing need and requirement figures which align more closely to the Plan's economic strategy.' FOE emphasis

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

Duty to Co-operate Reason:

Suggested Modifications:

The proposed additional housing should be withdrawn.

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5609809

Comment ID **HRU1541** Site ref (if applicable):

Person ID: **1242640** Name: **Mr James Firth** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

See attachment

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610088

Comment ID **HRU2229** Site ref (if applicable):

Person ID: **1181961** Name: **Mrs Julie Bullen** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

See attached

Do you consider the plan to be Sound?:

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/5635148

Comment ID **HRU2235** Site ref (if applicable):

Person ID: **1184942** Name: **Mr Mark Bullen** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

See attached

Do you consider the plan to be Sound?:

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/5635184

Comment ID **HRU2341** Site ref (if applicable):

Person ID: **1246930** Name: **Woodhouse Residents Association** Organisation: **Woodhouse Residents Association**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

See attachment

Do you consider the plan to be Sound?:

Sound Reason:

See attachment

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5635134 ; http://calderdale-consult.objective.co.uk/file/5635135 ; http://calderdale-consult.objective.co.uk/file/5635136

Comment ID **HRU241** Site ref (if applicable):

Person ID: **1242160** Name: **Mr David Astley** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

Green Belt is a protected resource and the council has a duty of care to protect this. There is no excuse for including green belt sites only laziness on the part of those involved who could not be bothered to put the efffort in identifying brownfield sites. The council should immediately remove those that failed in this task and replace them so that the plan can be done properly

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

Sound Reason:

Green Belt is a protected resource and the council has a duty of care to protect this. There is no excuse for including green belt sites only laziness on the part of those involved who could not be bothered to put the efffort in identifying brownfield sites. The council should immediately remove those that failed in this task and replace them so that the plan can be done properly

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

Duty to Co-operate Reason:

No residents want to lose their green belt sites, this has been made clear many times

Suggested Modifications:

Remove all green belt sites from the plan and use the brownfield sites that are making all the towns in the area look so underused and unloved. Actually put some effort in to it this time please.

Comments:

Additional Evidence Link:

Comment ID **HRU479** Site ref (if applicable): **LP1409**

Person ID: **1242680** Name: **mr Craig Martin** Organisation:

Agent ID: Name: Organisation:

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 that adding another 100+ houses to this area is detrimental not only to the wildlife but residents in the Hebble vale drive area. The increase in traffic since the last housing development down wood lane is ridiculous and the amount of near misses that happens is frightening. Having lived in this house for 15 years, only since the new houses at the brewery were built have I seen the water raise to dangerous levels. Building new houses on the proposed plot will undoubtedly add to this and flooding will become common place for those who live at the bottom of the valley. The road above this proposed development already floods and filters into the fields that disperse this water without this there is no natural barrier to stop it just careering into the beck and causing flash flooding. There is some wonderful wildlife around this area and that is slowly dwindling as deer have been knocked down through the increased traffic, and I am sure that all other wildlife will suffer from this

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

Duty to Co-operate Reason:

Suggested Modifications:

flood defences would be required as well as traffic management for the whole area

Comments:

Additional Evidence Link:

Main Issues and Council Response

Legal Compliance

Main Issues:

1. Loss of Green Belt

2. Brownfield land should be prioritised

Council's Response:

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

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

Test of Soundness

Main Issues:

1. Loss of Green Belt

2. Brownfield land should be prioritised

3. The Local Plan should quantify the scale of economic growth with using productivity growth or GVA. Neither automatically require increased labour supply needing to be housed.

4. Local Plan analysis also relies on the dated approach of transport infrastructure having a positive effect on economic growth. WYCA are reviewing and calculating the carbon impacts - it is probable that the review will call into question some road schemes in Calderdale (a foundation for the Policy On Plus Transport scenario).

5. The Council ignored the Inspector's alternative suggested approach of revisit the economic strategy, and failed to refer to it as an alternative within the consultation documents. Cabinet were misadvised in reaching their decision to increase the housing allocation, by failing to take up the suggestion of the Inspector to consider both increasing housing allocations or reassessing the economic strategy.

6. Continued reliance on approach within the 2016 Regional Economic Strategy (jobs growth as priority outcome), which no longer represents the LCR LEP current approach to enhancing economic activity (correctly focusing on enhancing productivity).

Council's Response:

1. The purpose of the Green Belt Review is to provide an understanding of the current strengths and weaknesses of the existing Green Belt and provide the basis for recommendations to change the Green Belt where appropriate. In order to assess Green Belt land against the NPPF purposes, a set of questions for each purpose has been developed including the need to prevent neighbouring towns from merging into one another and to preserve the setting and special character of historic towns.
In terms of the site assessment process, in order to identify the most sustainable sites a 'sequential' approach to housing allocations has been adopted that prioritises brownfield sites in the urban area, only using the most sensitive Green Belt when all alternative sites were used.
Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the Council has examined fully all other reasonable options for meeting its identified need for development. Document EV 09 Exceptional Circumstances for the Release of Green Belt (2018) considers the process that the Council has followed in relation to the potential need to release land from the Green Belt. The proposed changes to the Calderdale Green Belt are clearly a last resort and have been minimised. Furthermore, the boundary changes are essential to achieving a sustainable future for Calderdale – one that reconciles economic, social and environmental sustainability.

2. 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.

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

4. The Council considers the assessment of job growth and employment land requirement to be soundly base. The Regional Econometric Model is updated on a regular basis and any changes in forecasts will be monitored and taken into account when reviewing the Plan.

5.The Council's Cabinet agreed the adopted approach, which has been the subject of this consultation, following consideration of different options. (see CC31 Report to Councils Cabinet – 14th October 2019 Potential modifications to the draft Local Plan following receipt of the Planning Inspector's post stage 1 hearings letter, CC32 Minutes of the Cabinet meeting 14th October 2019, and CC33. Sustainability Appraisal of Options)

6. The Council considers the assessment of job growth and employment land requirement to be soundly base. The Regional Econometric Model is updated on a regular basis and any changes in forecasts will be monitored and taken into account when reviewing the Plan.

Duty to Co-operate

Main Issues:

1. Loss of Green Belt

Council's Response:

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

Suggested Modifications

1. The proposed additional housing should be withdrawn.

Council's Response:

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

Document Section: 3 Background

Representations

Comment ID **HRU1167** Site ref (if applicable):

Person ID: **1241652** Name: **R Graham Maslen** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

It is impossible to assess whether this consultation is legal or not without a background in planning legislation.

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

Sound Reason:

The revisions to the Local Plan that are the subject of this consultation are not sound. Philip Tetlock in his work over forty years has shown that forecasts made by experts are generally no more accurate than a 'chimp with a dartboard'. However we necessarily have to engage with forecasts in order to plan our future as best we can with the current information. Calderdale Council is locked into optimistic forecasts about employment growth over the next 15 years or so because Calderdale is part of the West Yorkshire Combined Authority and an agent in the Leeds City Region's StrategicEconomic Plan (SEP) which envisages an increase of up to 50,000 jobs by 2036. As the Council acknowledges, its forecasts are based on many assumptions (unemployment maintained at 4.1% over the period of the Plan etc), and it has exercised some caution in translating employment growth into houses needed. However it has not gone far enough. Population estimates indicate that there will in fact be a decrease in the working age population in Calderdale up to 2041. There is little evidence other than the unduly optimistic SEP to support the increase.

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

Duty to Co-operate Reason:

Suggested Modifications:

The Local Plan should not be changed to increase the number of houses to be built over the next 15 years.

Comments:

Additional Evidence Link:

Comment ID **HRU1376** Site ref (if applicable):

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

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

The council is not being open and honest with residents when stating the content of the Inspector's letter dated 16 July 2019 following the Stage 1 hearings. In the letter the inspector said "¦. -“ Further work may (being mis-quoted by the Council as 'would') be necessary to assess the implications of housing need and requirement figures which align more closely with the Plan's economic strategy"¦"¦.."Or alternatively the council may wish to revisit the economic strategy to better align with housing growth"The Council usually conveniently forget to mention this second option because it does not fit with their desire for more houses. In short, the inspector suggested an increase in housing numbers to meet the economic strategy OR review the economic strategy to align with the lower housing numbers. It is important to note the term ECONOMIC STRATEGY being used by the inspector, not employment strategy, not jobs numbers but the whole ECONOMIC STRATEGY. In light of a national, regional and local reduction in the working age population; Central Government, Leeds City Region and even the council's own Inclusive Economy Strategy now recognise that simple jobs growth is not sufficient to grow the economy. It is only one strand of the economy but there are others equally likely to succeed, e.g. increased productivity, skills training, reducing unemployment (higher participation rates), greater investment and innovation. The Council's INCLUSIVE ECONOMY STRATEGY (IES) makes great play on including more local people in the economy, bringing them back into work, better skills training, jobs for the less able members of our communities. Of course, most of these local people do not need houses because they already live here. So, where does the INCLUSIVE ECONOMY STRATEGY fit into the current proposals for more housing? The answer is that it doesn't because the Council seem to be ignoring any benefit from it. Consultants Turley were asked to establish the labour force growth and by association job growth, that could be expected to occur if 840 homes per year were built. Their report concludes that if we build 840 homes per year this will bring enough new people into the borough to fill 6,441 jobs, completely ignoring the fact that some of this labour force ALREADY EXISTS in the borough. Turley make it quite clear in their report that they have not considered ANY benefit from the INCLUSIVE ECONOMY STRATEGY and that further judgements on the effectiveness of the IES would have to be considered separately. The report also makes it clear that there will be the same unemployment rate as before so even some of those new people will be unemployed! We are building houses for people who currently do not live here and who will be unemployed when they move here. Meanwhile unemployed or underprivileged local people will stay unemployed and underprivileged, where is the INCLUSIVITY in that strategy. Throughout several questions to Cabinet, questions to Councillors and points raised at a scrutiny meeting, the council have steadfastly refused to commit to a review of their Economic Strategy or quantify any benefits brought by the IES. Instead they have simply taken the easiest option to build more houses and factories and destroy more green belt. NPPF para 137 states: Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. Unless and until the Council carries out a full, fair and quantified review of their Economic Strategy (not just their jobs growth) as required by NPPF and suggested by the Inspector in the post Stage 1 hearing letter, then the Local Plan cannot be considered to comply with NPPF 137 and must be considered unsound. Additionally, NPPF para 81 states that local planning authorities should: -“ Set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth" Whilst the council has something of a vision in the IES, there is no evidence of a strategy to achieve that vision nor to use it to achieve sustainable economic growth which does not at the same time destroy large areas of 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:

Comment ID **HRU1687** Site ref (if applicable):

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?: **No**

Legal Compliance Reason:

The Sustainability Appraisl Report is totally inadequate, see fuller comment at 3.5

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

Sound Reason:

In her letter of 16 July 2019, the Inspector drew attention to the mismatch between the Plan's projected job and housing numbers and said (para. 12) ""¦. the Council may determine it necessary to identify additional housing sites. Or alternatively the Council may wish to revisit the economic strategy to better align with housing growth." In the event, the Council chose not to revisit the economic strategy, but left Turley to align the housing numbers to the admitted aspirational job growth flowing largely from the Leeds City Region Strategic Economic Plan (SEP). This major error in the Council's approach is the root of the unsoundness of the current proposed main modifications to the Local Plan. The problem is compounded since, despite the reasonableness of delegating the modelling to experts (Turley) and to their sub-contractors (Edge Analytics), their report has been uncritically accepted, without giving proper weight to other reliable data sources, or to the thorough evaluation of the series of assumptions made by both Turley and Edge. The result is a job projection that does not stand up to the objective population evidence, and the housing requirement that flows from it is therefore similarly flawed.

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

Duty to Co-operate Reason:

Suggested Modifications:

The population and job projections should be revisited. The Sustainabilty Appraisal should be re-written with a much more critical and detailed approach.

Comments:

Additional Evidence Link:

Comment ID **HRU1787** Site ref (if applicable):

Person ID: **11797** Name: **Mr & Mrs Mark & Amanda Tattersall** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Inspector's Stage 1 post hearing's letter The Inspector's wording for the option of reconsidering the economic strategy has been misquoted and the second clause of the Inspector's options has been omitted in the Exceptional Circumstances for the release of Green Belt Technical Paper and the Site Reports for the additional sites. This has changed the meaning the Inspector intended and how she suggested the Council should proceed. The Inspector's Stage 1 Post Hearings Letter para 12 says: -“Further work may be necessary to assess the implications of housing need and requirement figures which align more closely with the Plan's economic strategy. Linked to this the Council may determine it necessary to identify additional housing sites. Or alternatively the Council may wish to revisit the economic strategy to better align with housing growth."(underlining added) The wording in the Addendum to Exceptional Circumstances for the release of Green Belt Technical Paper and the site reports replace may with would and omit to include the remainder of the Inspector's point (which is -“Or alternatively the Council may wish to revisit the economic strategy to better align with housing growth." Excerpt below from the Technical Paper: -“It was suggested that further work would be necessary to assess the implications of housing need and requirement figures which align more closely to the Plan's economic strategy."(underlining added) Turley Document Modelling the economic implications of the proposed requirement The reference to commuting and almost all references to the Inclusive Economy Strategy were removed from the Turley document for some 5 weeks of this consultation period on the Council's consultation portal. On highlighting this, the document reverted to the original version. The potential for an alternative to the additional dwellings on Green Belt has unfortunately been hidden for that time from consultees.

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 **HRU2236** Site ref (if applicable):

Person ID: **1184942** Name: **Mr Mark Bullen** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

See attached

Do you consider the plan to be Sound?:

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/5635184

Comment ID **HRU2240** Site ref (if applicable):

Person ID: **1181961** Name: **Mrs Julie Bullen** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

See attached

Do you consider the plan to be Sound?:

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/5635148

Comment ID **HRU2342** Site ref (if applicable):

Person ID: **1246930** Name: **Woodhouse Residents Association** Organisation: **Woodhouse Residents Association**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

See attachment

Do you consider the plan to be Sound?:

Sound Reason:

See attachment

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5635134 ; http://calderdale-consult.objective.co.uk/file/5635135 ; http://calderdale-consult.objective.co.uk/file/5635136

Comment ID **HRU441** Site ref (if applicable):

Person ID: **1125251** Name: **Dr Andrew McElligott** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

The plan is probably compliant within the very tight definition of legality but that should not distract from its numerous shortcomings in other respects which, hopefully, will be given just as much weight; just because something can be done, does not mean it should be done.

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

Sound Reason:

The revised plan is based on the wildly over-optimistic, policy-on with transport economic growth aspirations. In her letter, the Inspector gave the Local Authority the option of rowing back on these aspirations in order that the original housing estimates would work. The Local Authority however, seemingly in thrall to the collective economic growth fever of WYCA, chose to dismiss this option out of hand and, instead, decided to identify more land to build even more houses on. The economic growth estimates are a fantasy; it would not be so bad if this wishful thinking was just that (thoughts) but, unfortunately, it has concrete, detrimental consequences in the form of existing green field and green belt sites being earmarked for future development. Even if the building doesn't happen immediately, there is no chance of those sites ever reverting to green field / green belt status and so they will, ultimately, be lost as a green resource for future generations. All this in the middle of a climate emergency and recurrent severe flooding in the Calder Valley. The Local Authority should be re-assessing its entire economic growth strategy to take into account the new paradigm whereby economic growth must be weighed against damage to our local, national and global environment. The Local Authority should put a moratorium on development of any sites which act as 'sponges' and should identify sites for mass tree planting. The current plan, has not been properly prepared in that future need and infrastructure requirements have not been objectively assessed. The plan is not justified as it would be better based on a more realistic and more environmentally-friendly economic growth strategy. The plan is not effective as it will not be deliverable. The plan is hubristic and must be challenged.

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

Duty to Co-operate Reason:

Suggested Modifications:

Revisit the economic growth strategy so that it is based on realistic, sustainable and climate-friendly assumptions rather than the current fantasy projections; this, in turn, should allow more existing green field / green belt sites to be retained and planted for the benefit of future generations.

Comments:

Additional Evidence Link:

Comment ID **HRU874** Site ref (if applicable):

Person ID: **1242585** Name: **Mrs Lesley Maslen** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

I am not qualified to know whether this plan is 'legal'. I can say that originally LP0026, LP0177, LP0952,LP1625 were removed from the Local Plan. The residents in Greetland were not informed that these sites had been put back on the LP. In fact a Lib DemCounsellor Marilyn Greenwood told me this had been done at a 'closed' meeting by Labour Counsellors. Firstly I wish to say that rather than identifying this as 4 separate plots in Greetland, LP0026, LP0177, LP0952 and LP1625 should be treated as one unit. By splitting these up, you are not seeing the true picture. These 4 plots need to be considered together. My second point would be that the Council have made it extremely difficult to access to Calderdale web site. There has been no help in this. In fact it would almost seem deliberate that the Council has remained silent

and distant throughout this 6 week period. My third point is that the basis for the economic growth for WYCA is the most ridiculous plan I have ever read. They are basing the need to build tens of thousands of new homes based on figures that are not achievable - more a pigs might fly theory. 30,000-60,000 houses based on their economic growth figures which would assume an over optimistic growth for an area that has underperformed, to suddenly outflank every other Council in the land! How ridiculous. And will we surrender our countryside, open spaces and Green Belt for this plan? The revised plan is based on this optimistic economic growth target, and which the Inspectorate Katie Child suggested. Calderdale should review and instead keep to the original housing estimates. Instead Calderdale have actually INCREASED the housing figure, which required them to use MORE land to build houses on. This plan is based on unrealistic economic growth estimates, and the result will be that Calderdale will build too many houses, and, even worse, encroach onto the existing GREEN BELT. This cannot be acceptable. The Government has stated that GREEN BELT should not be built on, except in EXCEPTIONAL circumstance. Once these fields have been developed they will not go back to rural open space. Greetland is a small rural community. It is not West Vale, and it is not Elland, but Calderdale Council seem to think that by calling this area ELLAND, it makes a better case for itself. It does not. Greetland has about 1300 houses. Building 600 extra houses in a small area, within 1 kilometre of each other will totally change the nature of the area. The 4 sites are all designated GREEN BELT, and these 600 houses will destroy 38% of the Greetland Green Belt. there is NO evidence that Calderdale have even attempted to use Brown Field, derelict or empty sites. They have chosen to place these extra houses, not in the north of the town of Halifax, but all in this area of Green Belt. As I am writing this, Calderdale has yet again been flooded. In 2015 the area also suffered flooding. This part of the Calder Valley has numerous streams and underground springs. 3 of the plots are already flooded. LP0026 has also flooded. Building on any of these sites is a tremendous Flood Risk. In this stage of Climate Emergency, instead of building on our flood plains and soak-up land there should be a complete ban on building on these sites. If this land is built on, it will not be able to soak up water, resulting in more flooding in future. Who would buy houses on a flood plain? Instead we should be planting more trees in this area. Not just for Calderdale, but because our Global conscience demands it. The existing infrastructure cannot cope with a development of 600 houses. Lack of school places, doctors surgeries, dentists, local transport make this plan totally unworkable. Then add a further 1000-1200 extra cars to the one road, Saddleworth Road and you are just building in chaos, gridlock and pollution. The councils answer to this, apparently, is to 'adjust' the timings on the traffic lights. It would be laughable in any other situation. Calderdale's Local Plan needs to be stopped, and COMPLETELY rethought. The Inspector Katie Child must step in and prevent this massacre of our countryside.

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

Sound Reason:

See above

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

Duty to Co-operate Reason:

See above

Suggested Modifications:

Comments:

Additional Evidence Link:

Main Issues and Council Response

Main Issues and Council Response

Legal Compliance

Main Issues:

1. Sites along Saddleworth Road should be assessed together not separately.

2. Ineffective community consultation.

3. WYCA have ridiculous economic growth. It is not achievable.

4. The Council have gone against the advice of the Inspector and increased housing numbers rather than review economic growth assumptions.

5. There is no evidence that the Council has attempted to use brownfield, derelict or empty sites.

6. issues relating to flooding.

7. Lack of infrastructure (including schools, doctors, dentists and public transport).

Council's Response:

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

2. Extensive and inclusive consultation has been carried out throughout all stages of the Local Plan preparation process in accordance with the Council's adopted Statement of Community Involvement and is detailed in the Consultation Statement (Regulation 22).

3. The planned growth by WYCA for the sub-region is not a matter that can be addressed in the Calderdale Local Plan.

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

5. Document EV 51.1 Site Allocations Assessment Methodology - Publication Draft (2018) details the process the Council has followed in relation to the site assessment process. The document outlines the various stages of assessment from initial site identification to the implementation of the Sequential Approach. 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.

6. The NPPF makes it clear that 'inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere'. Supported by the Calder Catchment Strategic Flood Risk Assessment 2016 (SFRA), the Local Plan is focused upon managing flood risk from all sources and applying a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change.

7. The Infrastructure Delivery Plan is a compendium of projected infrastructure provision and it helps to ensure that this infrastructure is provided in a timely manner and in a coordinated and sustainable way. It

sets out the infrastructure that will support the level of development that is proposed in the Calderdale Local Plan.

Test of Soundness

Main Issues:

1. The revised plan is based on over-optimistic, policy-on with transport economic growth aspirations.

2. The Council have wrongly decided not to revisit the economic growth aspirations. Therefore, the requirement to find additional housing will have detrimental consequences to the Green Belt.

3. The Council has not taken into consideration the Council's 'Inclusive Economic Strategy' which could potentially reduce the impact on additional housing requirement.

4. The housing forecasts are likely to change, as we have left the European Union.

5. The Council need to review their Economic Strategy otherwise the Local Plan cannot be considered to comply with NPPF 137.

6. The Turley report has been uncritically accepted. The result is a job projection that does not stand up to the objective population evidence, and the housing requirement that flows from it is therefore similarly flawed.

Council's Response:

1.The Council considers that the methodology adopted in the Employment Land Study (EV1) meets the requirements of National Planning Policy Guidance and is soundly based. The report presents a number of growth scenarios, and the most appropriate scale of growth relates to the expected jobs created by the increased accessibility and transport improvements in the West Yorkshire plus Transport Fund programme, in the context of the policy objectives of the SEP.

2.The Council's Cabinet agreed the adopted approach, which has been the subject of this consultation, following consideration of different options. (see CC31 Report to Councils cabinet – 14th October 2019 Potential Modifications to the draft Local Plan following receipt of the Planning Inspector's post stage 1 hearings letter, CC32 Minutes of the Cabinet meeting 14th October 2019, and CC33. Sustainability Appraisal of Options)
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.

3. The Council considers that the assessments undertaken are consistent with Regional, sub regional and local growth strategies, as evidenced at Examination Stage 1 Hearings.

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

followed and also that Local Plans should be in place as soon as practicable.

5. For the reasons set out in CC21 – Modelling the economic implications of the proposed housing requirement Turley, 2019 and the consultation document " Housing Requirement Update and Potential supply" (CC39) the Council does not consider it appropriate or pragmatic to revisit the economic strategy at this stage in the plan making process. Such an exercise would be more appropriate in the first review of the Plan.

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.

6. The Turley report was undertaken by consultants specialising in this area of work in order to further examine the relationship between economic growth and housing. Given that local authorities must provide for the housing requirement in their SHMAs, in order to have a sound plan, the Council would run the risk of the plan being found unsound should it ignore its findings. These were discussed in detail with the consultants rather than simply accepted. By adopting the baseline growth scenario for the latter part of the Plan period the Plan does not fully reflect its findings.

Duty to Co-operate

Main Issues:

Council's Response:

Suggested Modifications

1. Revisit the economic strategy.

2. The local plan needs to be stopped and completely rethought.

3. Reduce the number of additional housing requirement.

Council's Response:

1. For the reasons set out in CC21 – Modelling the economic implications of the proposed housing requirement Turley, 2019 and the consultation document " Housing Requirement Update and Potential supply" (CC39) the Council does not consider it appropriate or pragmatic to revisit the economic strategy at this stage in the plan making process. Such an exercise would be more appropriate in the first review of the Plan.

2. The Government requires Local Plans to be adopted as soon as possible and will intervene where plans are not making adequate progress. The Calderdale Local Plan is at an advanced stage of preparation and will be reviewed after 5 years as required by planning guidance.

3. 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. Given this evidence the Council is not at liberty to simply lower the housing requirement.

Document Section: 3.4 Paragraph

Representations

Comment ID **HRU1378** Site ref (if applicable):

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

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

It is claimed that the 'Sustainable Option' has saved much green belt but we submit that it should go even further. Housing density figures should be much higher (suggest 45dpha or greater) and there should be greater use of brownfield urban sites, to remove entirely the take of 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:

Comment ID **HRU2275** Site ref (if applicable):

Person ID: **11354** Name: **Mrs Patricia Watson** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

See 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/5635450

Main Issues and Council Response

Legal Compliance

Main Issues:

Council's Response:

Test of Soundness

Main Issues:

1. Housing density figures should be higher.

2. There should be greater use of brownfield urban sites.

Council's Response:

1. Density multipliers were considered in order that the site capacities were reflected as accurately as possible, and without overstating capacity. The density multipliers agreed by the SHLAA Working Group were based on those included in 'Tapping the Potential'7 published in 2000. These have been used in assessing the housing allocations in order to determine indicative site capacity.

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

Duty to Co-operate

Main Issues:

Council's Response:

Suggested Modifications

Council's Response:

Document Section: Sustainability Appraisal

Representations

Comment ID **HRU1382** Site ref (if applicable):

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

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

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:

We disagree with the positive outcomes of SA 1. To Ensure Quality housing is available to everyone and SA3. To create and retain healthy, vibrant and inclusive communities in so far as they refer to affordable housing. Policy HS6, Table 16.6 identifies Zo

Additional Evidence Link:

Comment ID **HRU1504** Site ref (if applicable):

Person ID: **1244055** Name: **Mr Andrew Wood** Organisation: **Consultant Planner CPRE West Yorkshire**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Unfortunately, the Sustainability Appraisal of Options report (CC33) is wholly unfit for purpose, as it provides no meaningful basis on which to compare the sustainability merits and impacts of the proposed changes or consideration of reasonable alternati

Additional Evidence Link:

Comment ID **HRU1692** Site ref (if applicable):

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?:

Sound Reason:

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

This has been commented on more fully by Andrew Wood (CPRE). It seems to be an example of superficial box-ticking at its worst and regretfully, we have to agree with his view that the sustainability appraisal is wholly unfit for purpose. The details of th

Additional Evidence Link:

Comment ID **HRU1799** Site ref (if applicable):

Person ID: **1116208** Name: **Mrs Carol French Deol** 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:

SEE ATTACHED FOR FULL REPRESENTATION

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5635273

Comment ID **HRU18** Site ref (if applicable):

Person ID: **972696** Name: **Mr Keith Woodhouse** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

Calderdale have failed to make the local plans and objections to it accessible to the wider public. Even using this on line service is very complex and outside the limits of the majority of Calderdale people.

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

Sound Reason:

Calderdale have failed to provide details on Transport infrastructure changes, environmental impact such as pollution, impact on habitat and availability of services such as schools, doctors etc.

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

Duty to Co-operate Reason:

Calderdale have made the commentary process so complex by making small changes to the local plan and then re-issuing and expecting people to re submit their objections. It's like a war of attrition.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1905** Site ref (if applicable):

Person ID: **1242976** Name: **Mrs Lesley Pollacco** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

I am writing to object to the proposed plans for all of the above sites based on the following: - Objective 2 - TO IMPROVE SAFETY AND SECURITY FOR PEOPLE AND PROPERTY - This development will not improve this SA as there is no local police station or fire

Additional Evidence Link:

Comment ID **HRU1967** Site ref (if applicable):

Person ID: **1116260** Name: **Mrs Sarah Tindal** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

The sustainability appraisal is not realistic in its conclusions. To conclude that there will be a positive economic growth and that maintaining existing commuting patterns is a positive thing is not fully understanding the situation on the ground as a re

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5632237

Comment ID **HRU2039** Site ref (if applicable):

Person ID: **1185901** Name: **Avant Homes** Organisation:

Agent ID: **1139514** Name: **Nathan McLoughlin** Organisation: **Mcloughlin Planning**

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

SEE ATTACHED FOR FULL REPRESENTATION Avant has the following comments to make on the Sustainability Appraisal. The starting point for the document is to consider 4 options based on an annual housing target of "¢ Option 1 - 840 dwellings per annum. "¢ Opti

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

Comment ID **HRU2198** Site ref (if applicable):

Person ID: **1181617** Name: **Miss Allison Rushton** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

"¢ The sustainability document produced to address this aspect is not an in depth analysis of the issues and appears to have been produced simply to 'jump through the hoops' required under the legislative process rather than being a serious comprehensive

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5634787 ; http://calderdale-consult.objective.co.uk/file/5634785 ; http://calderdale-consult.objective.co.uk/file/5634788 ; http://calderdale-consult.objective.co.uk/file/5634789 ; http://calderdale-consult.o

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Comment ID **HRU2215** Site ref (if applicable):

Person ID: **1164799** Name: **Mr Stephen Webster** 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:

c. The Sustainability Appraisal (2019) supporting the proposed changes There is a distinct lack of funding around the local planning, what do the council believe they can therefor sustain their proposals? Junction 24a appears to be the lynch pin, there is

Additional Evidence Link:

Comment ID **HRU2226** Site ref (if applicable):

Person ID: **1246930** Name: **Woodhouse Residents Association** Organisation: **Woodhouse Residents Association**

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:

See attachment

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5635134 ; http://calderdale-consult.objective.co.uk/file/5635135 ; http://calderdale-consult.objective.co.uk/file/5635136

Comment ID **HRU2230** Site ref (if applicable):

Person ID: **1181961** Name: **Mrs Julie Bullen** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

See attached

Do you consider the plan to be Sound?:

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/5635148

Comment ID **HRU2237** Site ref (if applicable):

Person ID: **1184942** Name: **Mr Mark Bullen** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

See attached

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5635184

Comment ID **HRU2252** 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:

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

SEE ATTACHED FOR FULL REPRESENTATION We do not have any comments to make on the Sustainability Appraisal (2019) or the Habitats Regulation Assessment: Recreational Use and Urban Edge Impacts Update (2019).

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

Main Issues and Council Response

Legal Compliance

Main Issues:

1. The nature of the Sustainability Appraisal as published means that the proposals are probably not legally compliant, despite the fact of publication of the Sustainability Appraisal.

Council's Response:

1. The Sustainability Appraisal was undertaken using the Sustainability Appraisal Framework developed and adopted by the Council following consultation earlier in the plan making process. The revised housing requirement figure and additional allocations have been appraised against these objectives with the results influencing the final decisions.

Test of Soundness

Main Issues:

1. Objection to outcome of Sustainability Appraisal assessments. The Sustainability of Options (CC33) is unfit for purpose. There are too many 'uncertain' impacts. Superficial box ticking exercise.

2. Lack of affordable housing in the western settlements.

3. Before identifying a 'positive' outcome for SA1 and SA3, the plan must quantify the actual requirement for affordable homes on a settlement basis so a comparison can be made with the number to be delivered by this policy.

4. The Sustainability Appraisal of Options (1 to 4) was not produced until Dec 2019, long after the 14 Oct Cabinet meeting which decided to adopt Option 4. As it was not available to cabinet members at the decision meeting it was impossible to make a judgement on sustainability grounds.

5. No attempt to consider whether the different options (in CC33) could be delivered more or less sustainably through different spatial scenarios. No attempt has been made to increase densities, changing the approach to windfalls.

6. SA13 (To ensure the efficient use of land) should be negative on all 4 appraisals. The proposals do not go far enough in terms of making use of previously developed land and the use of mixed use, high density development.

7. Appraisal has not addressed in detail the issue of water run-off, especially given recent flooding events.

Council's Response:

1. The Council considers that the supporting text contained within the Sustainability Appraisal adequately explains the approach utilised.
The SA is part of the Local Plan preparation process and its purpose is to inform the development of the plan; it is not the sole contributor to proposing or rejecting site allocations. The methodology for assessing the impacts was part of the SA Framework that has been developed over a number of years. The SA Framework has been subject to a number of public consultations.

2. Policy HS6 is seeking to address the issue of affordable housing in the borough.

3. Affordable Housing Market Zones are shown in Map 16.1 of the Local Plan Publication Draft. Policy HS6 seeks to ensure that affordable housing is delivered across the borough, with differing levels required, taking into account market location, site size and financial viability.

4. The Sustainability Appraisal was completed prior to the Cabinet meeting of October 4th 2019. The key results were extracted and included in the report that was presented to Cabinet. Ultimately, Cabinet had regard to the Sustainability Assessment that was carried out against the 3 housing requirement options and elected to choose a fourth option which was subject to appraisal prior to formal consultation.

5. The purpose of the SA is to inform the plan preparation process by appraising the Local Plan's Objectives, Policies, and Allocations in relation to their sustainability, establishing their likely impacts, cumulative impacts, and the scope for mitigating any possible negative impacts. The SA is part of the Local Plan preparation process and its purpose is to inform the development of the plan; it is not the sole contributor to proposing or rejecting site allocations. The methodology for assessing the impacts was part of the SA Framework that has been developed over a number of years. The SA Framework has been subject to a number of public consultations.

6. The site 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.

7. SA Objective 7 considers flooding, and the impact of flooding on people and property.

Duty to Co-operate

Main Issues:

Council's Response:

Suggested Modifications

Council's Response:

Document Section: Habitats Regulations Assessment

Representations

Comment ID **HRU2199** Site ref (if applicable):

Person ID: **1181617** Name: **Miss Allison Rushton** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

This assessment does not address my concerns because in its opening paragraphs it specifically states that it does not address the implications relating to Air Quality on the M62 or the Class A Roads within Calderdale where they are within the 200 m of th

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5634787 ; http://calderdale-consult.objective.co.uk/file/5634785 ; http://calderdale-consult.objective.co.uk/file/5634788 ; http://calderdale-consult.objective.co.uk/file/5634789 ; http://calderdale-consult.o

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Comment ID **HRU2214** Site ref (if applicable):

Person ID: **1164799** Name: **Mr Stephen Webster** 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:

d. Habitats Regulations Assessment: Recreational Use and Urban Edge Impacts Update (2019) . How can the council think that by building over greenbelt areas the residents of Calderdale will gain in biodiversity? there is no need for quite the significant l

Additional Evidence Link:

Comment ID **HRU2253** 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:

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

SEE ATTACHED FOR FULL REPRESENTATION We do not have any comments to make on the Sustainability Appraisal (2019) or the Habitats Regulation Assessment: Recreational Use and Urban Edge Impacts Update (2019).

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

Main Issues and Council Response

Legal Compliance

Main Issues:

Council's Response:

Council's Response:

Test of Soundness

Main Issues:

1. Objection to loss of Green Belt and impact on biodiversity.

Council's Response:

1. 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.

Duty to Co-operate

Main Issues:

Council's Response:

Suggested Modifications

Council's Response:

Document Section: 4 Housing requirement 2018/19 to 2032/33

Representations

Comment ID **HRU1060** Site ref (if applicable):

Person ID: **1122768** Name: **Dr Sarah Vickers** 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 calculated increase in housing requirement comes from figures calculated before we had left the European Union. There are likely to be changes and probably reduction in housing requirements because of this. The changes in immigration law that will occur once we have completely left the European union will have more people locating to the cities for higher paid jobs that to Calderdale. Part of the increase in housing requirement is to provide housing for jobs being generated in Leeds. Calderdale has declared a climate emergency. More housing within Calderdale that destroys natural habitats and requires a commute to the place of work usually in cars and on congested roads is only going to exacerbate the climate emergency.

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

Duty to Co-operate Reason:

Suggested Modifications:

Reduce the number of additional housing requirement. It is based on out of date predictions and is unlikely to be required.

Comments:

Additional Evidence Link:

Comment ID **HRU1385** Site ref (if applicable):

Person ID: **980588** Name: **Mr Mark Baxendale** Organisation:

Agent ID: **960432** Name: **Mrs Charlotte McKay** Organisation: **Principal IOP Consulting**

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

Legal Compliance Reason:

See attached letter

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

Sound Reason:

See attached letter

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

Duty to Co-operate Reason:

We consider that the Council have seriously failed in their duty to cooperate given the fact that they seem to have given no consideration to the developments within Kirklees which will be relying on the same infrastructure as the proposed allocations and this seriously jeopardises whether the plan can be effective.

Suggested Modifications:

Please see attached letter

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5609784

Comment ID **HRU1386** Site ref (if applicable):

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

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

The report -" Modelling the economic implications of the proposed housing requirement" produced by Turley in 2019, is being used by the Council as the sole driver behind the allocation of additional sites and need for increased housing numbers above 840dpa. However, Turley make it clear in paragraph 2.11 that ; -"They do not seek to take account of changes associated with the Council's Inclusive Economic Strategy. This would require separate judgement to be made as to the likelihood of the success of proposed interventions and their alignment with the types of jobs forecast to be created." Similar statements are made in paras 2.16, 2.20 and 4.7 of the report. Having identified a potential housing requirement of 1040dpa,Turley are clear that they have NOT included any benefits coming from the Council's Inclusive Economy Strategy and that a review of these would require additional, separate work (by the council). In her letter to the Council following the Stage 1 hearings the Inspector suggested "¦" Or alternatively the council may wish to revisit the economic strategy to better align with housing growth" So, we have the Inspector and their own consultants suggesting that a review of the Economic Strategy could be carried out to identify benefits to employment and housing numbers. NPPF 137 states:-" Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making

authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development"? Yet the Council steadfastly refuses to consider any beneficial impact on housing numbers coming from its own supposedly inclusive strategy and ploughs on regardless with a programme of green belt destruction. The only possibly conclusion therefore is that this Plan is unsound.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1488** Site ref (if applicable):

Person ID: **10988** Name: **Mr Anthony Rae** Organisation: **Coordinator Calderdale Friends of the Earth**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

See my comments in paragraph 20 of the attached single response to the consultation.

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

Duty to Co-operate Reason:

Suggested Modifications:

The proposed additional housing should be withdrawn.

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5609810

Comment ID **HRU1509** Site ref (if applicable):

Person ID: **1244055** Name: **Mr Andrew Wood** Organisation: **Consultant Planner CPRE West Yorkshire**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

General Comment for Section 4: CPRE believes that Local Plans should aim to meet all genuine housing needs sustainably, by enabling the right amounts and types of development in the right places. In our view, it is entirely possible to achieve these aims whilst also enhancing the quality of the built and natural environment and people's access to it. In the light of the climate emergency, no stone should be left unturned in making new development contribute to better, more resilient places, which means that design, carbon emissions and green and blue spaces and engaged communities must be central considerations for all Plans, and these considerations are supported by NPPF. Walkability, active travel and drastically reducing dependence on car travel are specific, necessary and urgent objectives which we wish to see reflected in all Local Plans and planning decisions. The amended plan fails to engage with the climate, placemaking and sustainability implications of the proposed amendments, and is therefore neither positively prepared nor justified by the best available evidence.

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

Duty to Co-operate Reason:

Suggested Modifications:

The Plan must include specific policies and targets, to ensure that additional growth results in additional, commensurate reductions in greenhouse gas emissions, in order to be legally compliant and to beconsistent with NPPF(2012) para 95. Additional site allocations must specify how they will directly contribute to enhancing walkability, active travel and placemaking, and reducing car dependence.

Comments:

Additional Evidence Link:

Comment ID **HRU1823** Site ref (if applicable):

Person ID: **1130110** Name: **Mr John Rowlands** 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:

1new homes. I can see no evidence of how calderdale has reached the new figures for housing needs have

been reached. It seems the figures have been increased to accommodate calderdale,sincrease in economic growth figures, which has nostanding. They do not appear to have the amount of land needed to support the economic growth as pointed out by the public inspector and yetThe council seems hellbent on building the enterprise zone at clifton even though it will be of no benefit to the council in terms of rates as I understand these are to go to leeds council to begin with. The impact on the town fromall the extra traffic will be horrendous it is already nigh impossible to get through Brighouse at peak times, add to the traffic the numbers of people travelling from the proposed garden villages in clifton and wood house lane and the effect will be catastrophic.. 2 additional sites.it's strange that these new proposed brown sitebuilding plots have now been found when we were told that there were no brown sites available when the plans were annnounced to destroy the green belt around Brighouse. How come there is barely any new sites around Halifax a much larger town better able to cope with increased houses and population? 3sustainability there seems to be little in the way of improving the infrastructure to support the amount of building proposed for the Brighouse area .Brighouse is a small town sitting in the bottom of a valley with only two ways in and out. The river,canal and railway make this the only options. The proposed development is going to increase the traffic flow in and out of Brighouse by a horrendous amount, I just can't see how this is going to work, Brighouse is often gridlocked at peak times as it is,what is going to be done to help with this problem? Also all that standing traffic is going to be detrimental to the already poor air quality. TheFlooding that we have experienced these last two weekends just prove that everything is overloaded in Brighouse, the rivers, the beck that runs through the park and across to the Calder burst it's banks throwing huge coping stones across Wakefield road, people literally had to run for their lives, is this what calderdale wants on their conscience? Wakefield road was closed due to all the flood water ...yet again another problem for through traffic as there is no other way to the m62. 4 habitat. The area around clifton and Brighouse is an area of outstanding beauty, thepeople of Brighouse enjoy the walks around there to experience the joys of wild animals, such as deer, badgers, and the birds of which there are may endangered species nesting in the fields, like the curlew and tree sparrow. People need somewhere to relax and unwind there is not the same effect walking through housing estates . I feel strongly that green belt should be protected in line with government guidelines once it's gone it's gone!

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 **HRU1840** Site ref (if applicable):

Person ID: **1182803** Name: **Miss Sally Turgoose** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

I object to the proposal for the increase in the total Housing Requirement for Calderdale which will bring additional housing in Brighouse. The amount allocated to Brighouse ; 5168 homes - is disproportionate to other areas of Calderdale. In the proposed plan Brighouse will be taking the highest level of homes 35%, more than Halifax which seems unreasonable, particularly with the current infrastructure problems creating serious traffic and pollution issues in Brighouse. I experience the bottlenecks in Brighouse every day on my journey to work. The impact on me is also that as Huddersfield Road gets busier drivers use Woodhouse Lane as an alternative route. They pass by my house at speed (which is an issue I certainly don't think will be resolved by the creation of speed bumps) and carry on down to Birds Royd Lane through the industrial estate; this road is now in a terrible condition as a result. Schools, roads and GP surgeries are already at capacity. I also challenge the calculation of the need for so many additional houses due to economic growth and the creation of additional jobs. Current focus in business is on productivity rather than job creation and the decline in the working age population has to be taken into consideration. I am aware that Bradford has recently reduced its employment land and jobs targets to provide a more realistic economic projection. Building a total of 5168 homes in the Brighouse area would assume that a comparative number of local jobs would need to be available to provide employment to these new residents ; how can that be justified under the present calculations?

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

Duty to Co-operate Reason:

Suggested Modifications:

The plan should be modified to reflect a more realistic jobs growth figure, consequently reducing the number of houses required. I also strongly believe that there should be a fairer distribution of homes across the district and in relation to this I object to the large number of houses proposed in the Woodhouse Garden Suburb (LP1451).

Comments:

Additional Evidence Link:

Comment ID **HRU1965** Site ref (if applicable):

Person ID: **1116260** Name: **Mrs Sarah Tindal** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

The council have chosen option 4 from the potential decisions which has led to the increase in housing requirement. The council have not asked for comments from Calderdale residents regarding this decision which has a huge impact on the quality of life for everyone involved. The decision to increase the housing rather than reduce the economic ambition I believe is flawed. The plan is not realistic in being able to

deliver the economic plan. There are currently many warehousing and other employment premises vacant in Calderdale (currently 84 premises listed); what makes the council believe that further employment land such as the EZ at Clifton (as well as other developments required to fulfil the economic growth ambition ; an additional 9 sites the same size as Clifton EZ) will be filled? Current suggestions are that there are businesses within Calderdale who would move their business from one part of the borough to another which will not provide economic growth but will rather create an area of Calderdale that becomes more deprived while another area becomes richer. In addition, the council would lose a significant sum of business rates as the money goes to Leeds rather than locally, further exacerbating the deprivation in some areas. The flooding issues experienced throughout the borough (which are worsening on each occasion) are a significant factor that I do not feel the council have robustly addressed. An increase in housing (even with flood mitigation) will make the flooding problems worse. In particular, building on Thornhills, above Brighouse, will mean a greater flow of water into the town, making the flooding in Brighouse worse. I believe the most appropriate option would be option 1 which is to reduce the economic growth to match the housing need for the borough. This option will also mean that the loss of greenbelt can now be avoided as the need can be met from the allocations found in the option to increase housing to meet economic growth option. The original claim by the council that there were exceptional circumstances to use a significant area of greenbelt across Brighouse must now, in hindsight, be unsound. The claim that there were no alternatives

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5632237

Comment ID **HRU2038** Site ref (if applicable):

Person ID: **1185901** Name: **Avant Homes** Organisation:

Agent ID: **1139514** Name: **Nathan McLoughlin** Organisation: **Mcloughlin Planning**

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION In addition to the submissions in the BW Consortium submission, Avant welcome the acceptance in Section 4 of the RAU that the Plan needs to increase its housing requirement. The Inspector's Interim Conclusions set out in paragraph 11 of EiP document INS07, was that the Plan's evidence indicated a higher housing requirement and that the Inspector considered the amount to be -“at least 1001 dpa"mirroring employment growth baseline and the SHMA recommendations. Avant's position is that this is a minimum and the Plan has to provide a higher level of housing meet economic aspirations, affordable housing requirements and address historic under-delivery.

To support this position, as required by NPPF Paragraph 47 (first bullet point), a Plan has to meet its full objectively assessed needs. In this case, the HRU does not go far enough in this respect. It is Avant's position that whilst the 1040 dpa target is proposed, meeting the need requirements would provide the Plan with more flexibility and robustness in terms of the delivery of housing sites. Turning to Table 1 and Paragraph 4.1, reference is made to the need to review the Plan 5 years from date of adoption. In undertaking a review, guidance in Paragraph 33 of the 2019 Framework and Regulation 10A of the TCPA (Local Planning) (England) (Amendment)Regulations 2017 only requires LPAs to review Plans to see if they need updating or not. Crucially, neither the Regulation or the Framework require a mandatory review of the Plan, but rather allow a LPA to -"self-certify" as to whether there is the need for a Plan review. This could mean that from 5-years of adoption, the LPA concludes that there is no need for a review. Therefore, it is inappropriate for the HRU to plan for a review which may or may not happen. As a result, the HRU should plan for a higher level of housing now.

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

Duty to Co-operate Reason:

Suggested Modifications:

The HRU should plan for a higher level of housing now.

Comments:

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

Comment ID **HRU2057** Site ref (if applicable):

Person ID: **1246735** Name: **Mark Mullany** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

I do not accept the need for additional Green Belt sites to be allocated because the Council had the opportunity to revise its economic strategy to align with the minimum housing requirement originally submitted, but opted to increase its housing figure to match economic predictions which are highly uncertain and unreliable beyond the first years of the Plan. The Council's decision to pursue increased jobs and housing growth is unsustainable as evidenced by the need to allocate large areas of Green Belt land and signals a 'business as usual' approach at odds with its commitment to tackling the climate emergency.

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 **HRU2117** Site ref (if applicable):

Person ID: **1139521** Name: **Cllr Sophie Whittaker** Organisation: **Councillor**

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:

Section 4 - The proposed change to the housing requirement I strongly object to the proposed change to the housing requirement made by Calderdale Council due to the sheer lack of existing infrastructure we have to support the additional growth in houses, and in the absence of an adequate and sound infrastructure plan. I also strongly object to the proposals that will see the Brighouse and Rastrick area significantly overdeveloped with an additional 5,168 new homes plus several employment sites (including an Enterprise Zone). This equates to 35% of all homes proposed for Calderdale as a whole, which is more than the largest town's (Halifax) proposed intake. This will grow Brighouse by a third of its current size and put the area at risk of 'urban sprawl', turning our town into a 'commuter belt' due to its location to the M62. As a Councillor for Rastrick, I have reiterated my comments in previous consultations about the community's concern about our already overstretched infrastructure - not just GP surgeries, schools and other frontline services, but the capacity of our highways, train services, our drainage and sewerage systems, and number of little remaining floodplains/Greenfields (including Green Belt) in our area. Calderdale already struggles to retain staff working in the Public Service (GPs, Council Officers, hospital staff, etc.) due to the competing salaries of the two cities commutable from our area (Leeds & Manchester). In fact, in 5 years' time, a large percentage of our Calderdale doctors will be reaching retirement age meaning that a huge challenge lies ahead for our health services to replace and retain GPs to not only continue to provide a good level of care and service to existing residents of Calderdale, but to accommodate for the increase in population. I therefore have real concerns about the future of the Brighouse area in particular, due to the sheer volume of proposed new houses, coupled with an inadequate infrastructure plan with no evidence of funding or deliverability, and no guarantee that those moving into these new houses will be those who work in the area. This will result in more traffic on already heavily congested roads (try getting into Brighouse along Wakefield Road on a Friday lunchtime from Junction 25 on the M62 ; and that's not even a Peak Time), deteriorate air quality , pollution and associated health and wellbeing of residents, see the loss of the majority of our Green Belt (certainly in Rastrick), will increase the flood risk , and push our already overburdened public and frontline services past breaking point. Furthermore, the Local Plan goes against its own 'Climate Change Emergency' declared on 30.01.2019 with regards to air quality, transport and flooding. The recent events of Storm Chiara (09.02.2020) and Storm Dennis shortly following (16.02.2020) illustrated the Calder Valley's vulnerability when it comes to flooding. I received reports from residents living in Rastrick saying that they had witnessed flooding where previously it had not flooded, even on Boxing Day 2015 which was the most

recent serious flooding event in Calder Valley. Disproportionate and overdevelopment of our area, as is recommended in the Local Plan, would decimate our area, leave very little Green Belt/open spaces for residents and wildlife to enjoy (in fact only a few tiny parcels in Rastrick would remain), rapidly deteriorate our air quality (increasing mortality rates and risk) and exacerbate flooding in our area. I would suggest that in order to mitigate against the potentially irreversible effects of their housing and employment plans for Brighouse/Rastrick, the Council start by: Reducing jobs growth so it is more achievable and realistic Reducing the numbers of homes required Distributing homes more fairly across the district Producing a sufficient and deliverable infrastructure plan for our area that will support housing and employment growth

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 **HRU2163** Site ref (if applicable):

Person ID: **1184963** Name: **Kim Boothroyd** 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 FOR FULL REPRESENTATION Calderdale has not sufficiently explained the relationship between housing need, population and the justification for their economic growth aspirations. The previous plan suggested South East Calderdale would take over 40% of the borough's development because of the proximity to M62. The Local plan does not in any way, shape or form look after the interests of the residents in Thornhills, Clifton and Brighouse, it is completely the opposite. The interests and health and wellbeing of the community within Clifton have been completely disregarded and discounted. The proposed development in the Thornhills area of Clifton and Brighouse is categorically disproportionate to the whole of Calderdale. Clifton is a settlement which will be lost should the plan be implemented. Following the initial submitting of the Local Plan, I understand that the Planning Inspector gave Calderdale Council two options, reducing economic growth to match the current housing numbers or increasing housing sites. Of the two options available to Calderdale they have proposed to actually increase the number of housing, in an area they were already proposing to vastly over-develop, inexplicably proposing a further growth of development in South East Calderdale. Why is this? The Inspector did not say that Calderdale should increase the number of houses. Calderdale have chosen to do this. These are their aspirations. By Calderdale doing this they have denied us the chance to discuss economics and they have no justification as to why they have chosen this option. Why is the number of houses not correlated in a

justifiable manner? There is no correlation between what we need in Thornhills and Brighouse in general and what they are proposing. Moreover, there has 2 been no opportunity for the public to debate the inspector's options. Calderdale were, in fact, told to match the housing to the economical aspirations. We have not had chance to make a choice. What is the link between housing and economic aspirations? Can Calderdale explain where these figures have come from? The economic land survey was in draft form and was not published therefore what confidence is there that the figures are correct? It appears that Calderdale have commited themseves to following Leeds City region's regional growth strategy and aspirations. Why is this? Surely the question should be what should we, in Calderdale, be doing? I would ask where are all the jobs coming from to justify the number of houses Calderdale wish to build? Why has the housing allocation increased to be in line with economic number? Why does the new figure (997 dpa) that Calderdale are proposing for housing NOT correlate with their own calculations (formula)? There is no sound correlation between what Calderdale are proposing and what is actually needed. Based on the economic land survey it suggests the 'fudged' economic figures have created the housing allocations which one would think this appears to be a mismatched made up figure. Can Calderdale justify their calculations with real factual data? The inspector gave two options to Calderdale regarding their mismatched figures. How can Calderdale justify increasing housing in the Brighouse area? Is Calderdale able to prove an economic demand for the housing in Thornills and Brighouse? How was the original plan ever sound?

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/5634795 ; http://calderdale-consult.objective.co.uk/file/5634798

Comment ID **HRU2166** Site ref (if applicable):

Person ID: **1183705** Name: **Mrs Adele Hannah** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

I object to the Council's proposal to increase the total number of houses required in the plan. Already the traffic in and out of Brighouse is heavy but further homes could effectively make Brighouse a commuter town due to its location on the M62 motorway. Inevitably not all the people that move into these homes will work here ; meaning the addition will result in more traffic movements, pollution and impact on climate change. In an age where we are supposed to be encouraging more eco-friendly options, this addition goes against the Council's own climate emergency policy - impacting on air quality which affects

my family's well-being and health. Just recently we have seen more flooding then ever before in Brighouse and yet the council plan to take away the green belt and replace it with housing ; surely this will only make things worse! I have seen no evidence that transport and infrastructure improvements will be in place to support this amount of growth. Our Doctors are already overstretched with some people unable to make appointments for weeks. How can these already overloaded services cope with even more homes and families? In addition, the schools cannot expand on their current sites meaning further buildings would be needed, or the students shipped out to other areas "¦.. meaning more traffic, pollution, etc. The idea specifically that even more homes are proposed for Brighouse than before is ludicrous. Brighouse is getting more than its fair share of development; I appreciate the need for some new homes (although I would like to see reordering and refurbishment of derelict areas first) but the demand should be catered for more equally, spread throughout Calderdale and if one area was to see a higher increase, why should that not be Halifax as the largest town in our borough? I would like to see the plans modified to reduce the planned job growth, making it more achievable and realistic. The number of homes required could then be reduced and distributed more fairly across the district.

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 **HRU2169** Site ref (if applicable):

Person ID: **1129942** Name: **Norah Smith** Organisation:

Agent ID: **1246896** Name: **Gen Kenington** Organisation: **Associate Director Johnson Mowat Planning Ltd**

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION The Council propose to increase the Housing Requirement to 1,040 dwellings per annum for the first 10 years (Policy-on plus transport growth) and 910 dwellings per annum for years 10 ; 15 of the plan period based on the baseline growth figure in the Turley report. Over the 15-year plan period this equates to an annual requirement of 997 dwellings. It is disappointing that the Council have chosen to reduce the housing requirement for the last 5 years of the Plan, citing the uncertainty around the complexity and assumptions around modelling. Whilst we welcome the increase in the housing requirement from the Publication Draft version, it is considered that the 'policy-on plus transport growth scenario' should continue for the duration of the plan period, and be referenced in Table 1 as a minimum requirement. The overly cautious approach of reducing the requirement for the last 5 years of the plan does not align with the Council's growth aspirations and Local Plan vision. It is

recommended that the Housing Requirement for the Total Plan Period 2028/29 to 2032/33 (Table 1) is increased to 15,600 (1,040 dpa) As a result of the recommended increase in the housing requirement additional sites should be identified.

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

Duty to Co-operate Reason:

Suggested Modifications:

Increase housing requirement to minimum of 15,600 Identify additional housing sites Identify LP1472 as a Housing Allocation

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5634580

Comment ID **HRU2176** Site ref (if applicable):

Person ID: **1182117** Name: **Mr Stewart Brown** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

Disproportionate amount of development proposed for the Brighouse and Rastrick area. 1.1. The Council's assumptions on Housing Requirement fail to meet the needs of the population of the whole authority area. With Brighouse scheduled to get 35% of all homes proposed it is obvious that after also taking out the numbers scheduled for Halifax (30%) the remaining numbers are very small for the rest of the Authority. 1.2. Halifax is the largest town in the borough and should naturally receive the largest proportion of employment and housing development. Halifax is scheduled to take 4,448 new homes but Brighouse is scheduled to take 5168 new homes, which includes a new Brownfield site at Millroyd Street, not even mentioned in the first Draft Plan. 1.3. There is an abundance of land of little agricultural value higher up the valley (particularly in the light of current thoughts on climate change and CO2 emissions) upon which housing developments could take place. Why therefore plan to develop the Woodhouse site which is entirely Green Belt, and would totally remove an area of valuable prime agricultural cropland, land which is to be found nowhere else within the Authority's area (and which Calderdale have said they value). This same land has protection for Bats, Hedgerows, Notable and Ancient trees, and provides valuable drainage for surrounding areas. The recent flooding in the Calder valley has highlighted the folly of large concentrated developments in localised areas such as being suggested for Clifton and Woodhouse. Clearly Brighouse cannot cope with existing flood risks so to add extra housing drainage and run-off would dangerously exacerbate the problem. Carefully managed building land higher up the valley however could be engineered to mitigate flood risks. The size of the developments proposed will lead to Brighouse becoming a dormitory town with significant increases in commuter traffic to Leeds and Manchester which will make Calderdale's Climate Change Targets impossible to achieve. The Authority have wrongly stated

there are no more Brownfield sites than those mentioned in the original Plan, however, mysteriously a number of sites have 'suddenly' been discovered. Development of these would allow better dispersal of the populations' housing needs and reduce the demand for new 'greenfield' sites. It is not sufficient for the Authority to claim they are unsuitable, without carrying out full survey work and stating the reasons why they should be discarded, the details of which they have so far appeared not to have published. A recent study by Bradford Council (population 530,000) which is more than double that of Calderdale (210,000) has caused it to revise its land and jobs target from 135ha to 60ha of employment land compared to Calderdale's 97ha. Why should the smaller authority need 62% more than the larger authority? I strongly recommend Calderdale be requested to examine their figures again and come up with realistic targets rather than -“back of a fag packet"dreams. 5.1. The revised -“Modelling the Economic Implications of the Proposed Housing Requirement"by Turley seems to be a very circular report based on out of date employment figures assessed by Calderdale Council. These figures are at best dubious and at worst guesswork when compared with other authorities' more scientific calculations (as above). To balance the 'books' it would seem the removal of a large Garden Suburb Plan could be removed from the Local Plan without detriment to the future housing requirement. 5.2. Recognition should be given to industry's desire to see efficiency improvements through technology rather than numbers of the workforce. 5.3. Displacement of the workforce also needs to be recognised which is certainly going to be increased following the detrimental effects on businesses in the area damaged by the recent floods thus reducing the overall number of new jobs. I would like to challenge Calderdale on its assessment of Sustainability. Nowhere is there information on studies or even detailed reference to Climate Change, Bio-Diversity, Carbon Emissions, Landscape. Nowhere in the Plan have I seen reference to what will happen to transport and roads. There appears to be a belief that it will mysteriously just sort itself out, to accommodate the additional increased numbers of residents, theoretically up to 7500 extra journeys per day. The infrastructure in general to support all of the proposed new development sites around Brighouse has sadly been completely omitted from the Plan. Doctors Surgeries struggle now to serve the existing population, secondary schools will not be able to accept the increase in students, air pollution will increase with additional traffic flow and quality of life will deteriorate. 8.1. I currently travel by car at all times daily from South to North through Brighouse and rarely am I able to progress in less than 15 minutes for a 1.25 mile journey. This is on a normal day (including weekends) when no special circumstances cause additional congestion. If the M62 is blocked or there is a diversion or road works it may take up to an hour or more to get through the town, even using avoidance routes and cut-throughs. What will happen if the Garden Suburbs are developed without the infrastructure? 8.2. Any additional M62 exit slip such as the proposed Junction 24a would have a devastating effect on Brighouse which cannot cope now. 8.3. The town centre traffic flow is poorly designed now leading to bottlenecks and delays. The proposed Millroyd Street Development could alleviate one small part of this problem if expertly designed, taking into account existing businesses, overall traffic flows, flooding etc. 8.4. Nowhere in the Plan is there a reference to Infrastructure planning or funding from which we must assume that Calderdale believe no changes are necessary or someone else will pay. I wonder who that will be? CONCLUSIONS 9.1. I believe that further changes proposed through the consultation process have not been considered and numerous issues still remain unaddressed. I therefore believe the Plan is unsound. 9.2. There is evidence that much more work is required by Calderdale Council to produce a Plan that is Sound.

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 **HRU2185** Site ref (if applicable):

Person ID: **1118404** Name: **Mr Andy Speck** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

My objections and comments are detailed below. Sections 4, 5.3 and 7. Congestion resulting from an increased population not working in Brighouse. The majority of the residents for the 5000 new houses will not be employed in Brighouse and therefore will be commuting, putting a significant pressure on the existing road and rail infrastructure, both of which are at capacity. Therefore congestion and pollution will increase, contradicting the councils climate change and environment policies and objectives. For example, most days of the week, including Saturdays, the queue on Huddersfield road is back into Kirklees. The noise and emissions is significant, even the move to electrification won't help as there are significant trucks and buses were electrification isn't an option. Green belt spaces allow for air movement and distribution and dilution of fumes. Building houses and roads on green belt land not only increases exhaust fumes from the vehicles accessing these houses but also reduces air movement and dilution of fumes , meaning both existing residents and new residents will be subjected to poorer air quality with the associated detrimental impact on health. Retaining green belt land for Brighouse residents will ensure a healthy population and prevent the loss of habitat and valuable green space. Policy on Climate Change. Building on green belt land reduces the available vegetation that captures CO2. This appears to be at odds with the councils stated policy on Climate Change. Brown field sites such as Milroyd Street are better options for house building. Flood risk. The flood risk in Brighouse, recently tested and found wanting, is a major concern to the region. Converting a large area of green belt land such as the Woodhouse Garden Suburb into roads , houses and driveways will reduce the ability of the land to soak up water and is highly likely to increase the volume and flow of water draining into the canal and River Calder in Brighouse town centre , increasing the flood risk. Also once the flood defences have been completed in Hebden Bridge and Mytholmroyd this could also move the flood risk further down the Calder Valley into Brighouse. Limiting building to brown field land should be the Council's strategy. Whilst I agree that Brighouse should accommodate a degree of increased housing , the amount proposed is totally disproportionate to the size of the town and its infrastructure , will add to the already unacceptable congestion on all main roads , will worsen air quality for its residents and increase flood risk. The council should reduce the number of houses planned to be built in Brighouse and allocate in more appropriate areas of Calderdale. The housing in Brighouse should be limited to brownfield sites and not green belt land such as the Woodhouse Garden Suburb. This will reduce the impact on air quality , congestion and flooding and make Brighouse a more pleasant place to live.

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 **HRU2187** Site ref (if applicable):

Person ID: **1104200** Name: **Mrs Jennifer Rowlands** 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:

1- New homes Ifeel strongly that there has been no explanation to the public how calderdale has worked out the need for the increased number of housing, in relation to the economic growth projectionsand why it has to be primarilyaround the Brighouse area.where have the figures come from relating to new jobs expected to be created? If the economic growth projection is incorrect then calderdale does not need to build as many new houses. It would appear to the lay man that figures are just dreamt up to correlate with the supposed economic growth.if the proposed enterprise zone is built in Brighouse and the units are taken by existing businesses from higher up the valley then not only will calderdale lose the rents from existing units but will not get any from the enterprise zone as these are going to leeds....seems bad business sense to me. Also, This will create more traffic through Brighouse as workers will have to travel further to work. The whole forcast and plan seems flawed.

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 **HRU2195** Site ref (if applicable):

Person ID: **1181617** Name: **Miss Allison Rushton** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

The proposed changes to the number of homes which are needed over the next 15 years I do not believe that Calderdale council has sufficiently explained the relationship between housing need, population growth and how it has arrived at the figures for the economic growth aspirations. The proposed changes to the number of houses should be linked to the economic strategy and aspirations for Calderdale but there appears to be a mis-match between these two elements and no explanation of the economic land figures that correspond to the revised housing figures. The revised housing figures do not match any of the options that were previously suggested by the inspector. As the economic aspirations are fundamental to the local plan overall, and underpin the number of houses needed, I consider them to be a fundamental aspect of the plan. However, it is extremely disconcerting that these vital economic growth issues have not been reviewed, consulted upon as part of this consultation or justified by Calderdale I do not consider that Calderdale's economic aspiration figures have been objectively assessed or evidenced, nor am I confident that Calderdale's economic growth for cast is realistic or achievable I am concerned that the finance exists to add extra development in South East Calderdale because of Calderdale's documented current funding issues. Calderdale council and West Yorkshire Combined Authority recently published their budgets. Both accept there are funding issues, the amount of future funding is uncertain and it is likely both will require further cuts or borrowing to fund their growth aspirations. It is known that Calderdale Council has asked for permission to receive Â£90 million back from West Yorkshire Combined Authority and this casts doubt on whether the finance exists to add extra development in South East Calderdale. Although Calderdale were asked to consider the options of identifying additional housing sites or reconsidering their economic strategy: the option of matching their economic strategy to the housing numbers in the original draft plan has not been discussed in detail. It appears that Calderdale has assumed that Calderdale's residents support and agree with their growth plans which is not necessarily the case. I do not believe that this approach is justifiable and Calderdale has failed to provide a robust evidence based explanation for this decision In my opinion Calderdale should have selected the option of aligning the housing needs to the economic forecast containing in the previous plan submission to the economic forecast in that plan, rather than simply increasing the housing allocation in the latest version of the draft There are already a significant number of empty industrial units in Calderdale and the business trend is away from manufacturing and towards service based industries and warehousing. The warehousing sector is seeking large industrial units and the size of units proposed for the Clifton Enterpize zone are far too small to attract this type of business and in any event, the gradient of the approach road make this site unrealistic for the size of transport needed by such businesses. Calderdale seem to have failed to explain how they will make up within their economic data the loss of business rates that will arise if the proposed Clifton Enterprize Zone is implemented. I understand that some employers in Calderdale have already been approached by the council about possibly re-locating to the potential Enterprize Zone. I understand that businesses who occupy the business park will benefit from not having to pay business rates for the 5 years under the Business Rates Relief Scheme. In addition any subsequent income generated from business rate will be paid to the Leeds City region rather than Calderdale and over a 25 year period this is predicted to amount to cÂ£100 million. In my opinion this loss of revenue is a vital factor when reviewing the economic growth aspirations and how these impact on the allocations for housing. It is now known that the large Crosslees factory at Hipperholme near Halifax is due to close. The area of this site is approximately the same as the proposed new Clifton Enterprize Zone. This represents a huge potential development site which could be used instead of the proposed site at Clifton. I would imagine that the re-development of the existing site could be achieved at a significantly lower cost than a new development in Clifton whilst avoiding the need for major new road and infrastructure work. Using this alternative site would also preserve the farmland, habitat, wildlife and woodland at the proposed Clifton Enterprize Zone site. From a

commercial perspective re-developing the Crosslees site would be a more sensible, viable and sustainable option because it would enable Calderdale council to retain business rates revenue that would otherwise be lost to Leeds City region. My concerns regarding the economic growth forecasts and lack of an explanation of the revised economic growth aspiration figure related to the revised housing needs figures is in part influenced by Calderdale's use of flawed data within their planning application for the road within the proposed Enterprize Zone. Although the latest draft plan submission increases the housing need figure I cannot see an understandable explanation of why this does not include an attempt to quantify the associate economic land requirement. In addition, there does to appear to be an explanation of why Calderdale has chosen to not use one of the options outlined previously by the Government Inspector to address this aspect i.e. the amended proposed housing figure of 997 does not match any of the figures of 840, 910 or 1040 In reality the cost of development of the Clifton Enterprize zone is likely to be greater than currently predicted due to the difficulty of building on a hillside with a steep gradient and the issues that will be involved in trying to mitigate the flooding issues which will be worsened by developing what is currently fields and woodland. Although the intention is to use containment tanks to store surface water run off the proposed Enterprize Zone this will represent a further cost to developers, more technical difficulties in implementing the plans and I am not convinces that in reality such facilities will be sufficient to prevent further flooding. These factors will make the site less attractive to potential developers of the site and this in turn means that the economic growth generated and the timing of this growth is likely to be less and slower than anticipated. I believe that this in turn will have a knock on effect on the number of properties required i.e. the increased housing numbers need to be revised downwards from the revised proposed figure of 997 p.a. I have known this area of Clifton for over 50 years and am therefore very aware of the flooding that currently occurs on Wakefield Road which borders the proposed Clifton Enterprize Zone. The floods which occurred on 15 th January 2020 resulted in the police closing this road at the junction where it meets Clifton Common because of the dangerous amount of water. In the latest submission, Calderdale claimed that the proposed housing development in the Thornhills area of Clifton would be built out in 5 years. This conflicts with the previous draft plan submission which indicated that 600 dwellings could not be delivered with the plan timescale. What has changed in the intervening period to make such a change possible? I cannot see that this significant change has been explained within the latest submission or any evidenced based rationale for this change. I do not feel that it is realistic to believe that this number of properties could be built and sold within the timescale envisaged. This is because this type of development would have to be built in a number of phases with properties released for sale over a long period of time. It is well known that commercial developers use this approach to avoid tying up capital and resources before revenue is generated from the sale of properties from each stage of the development. If a large number of properties are built at outset the principle of supply and demand will result in potentially buyers only being willing to pay a lower price than it the supply of residential property was more limited.

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 **HRU2203** Site ref (if applicable):

Person ID: **1163507** Name: **Mrs Janet Stanley** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

We totally disagree with Calderdale Council's plans to increase housing numbers as there is a clear mismatch between the Council's housing allocations and economic growth. There has been no clear explanation from the council about the link between housing and economic growth. The council have not explained where the jobs are going to come from for the people moving into the new houses, which will lead to increased commuting out of the area which will lead to a further impact on the already heavily burdened road infrastructure. The house building needs should be carefully matched to current economic forecast. Why has the council not asked for our views on the economic goals? We want the council to explain to us where the jobs are going to come from. The National Planning Forum view is that economics should be correct before moving on to the housing ; and the economic argument is fundamental to the overall Calderdale Local plan, but the council has not consulted on this. Currently, many warehousing and other employment properties are vacant in Calderdale (currently 84 listed premises). What makes Calderdale council believe that further employment land such as the Enterprise Zone in Clifton be filled? Businesses moving from one part of Calderdale to another will just redistribute empty warehousing. It will not create economic growth. It will create unfair distribution of economic success. The planned Clifton Enterprise Zone will not help Calderdale financially as all rates will be paid to Leeds ; in fact it will impede Calderdale's wealth as if businesses move out of Calderdale rate paying premises (and those premises cannot be filled) to the planned Clifton EZ, then Calderdale will receive less money.

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 **HRU2205** Site ref (if applicable):

Person ID: **11325** Name: **Mr Graham Stanley** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

We totally disagree with Calderdale Council's plans to increase housing numbers as there is a clear mismatch between the Council's housing allocations and economic growth. There has been no clear explanation from the council about the link between housing and economic growth. The council have not explained where the jobs are going to come from for the people moving into the new houses, which will lead to increased commuting out of the area which will lead to a further impact on the already heavily burdened road infrastructure. The house building needs should be carefully matched to current economic forecast. Why has the council not asked for our views on the economic goals? We want the council to explain to us where the jobs are going to come from. The National Planning Forum view is that economics should be correct before moving on to the housing ; and the economic argument is fundamental to the overall Calderdale Local plan, but the council has not consulted on this. Currently, many warehousing and other employment properties are vacant in Calderdale (currently 84 listed premises). What makes Calderdale council believe that further employment land such as the Enterprise Zone in Clifton be filled? Businesses moving from one part of Calderdale to another will just redistribute empty warehousing. It will not create economic growth. It will create unfair distribution of economic success. The planned Clifton Enterprise Zone will not help Calderdale financially as all rates will be paid to Leeds ; in fact it will impede Calderdale's wealth as if businesses move out of Calderdale rate paying premises (and those premises cannot be filled) to the planned Clifton EZ, then Calderdale will receive less money.

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 **HRU2206** Site ref (if applicable):

Person ID: **1139653** Name: **Mr James Leslie Stanley** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

We totally disagree with Calderdale Council's plans to increase housing numbers as there is a clear mismatch between the Council's housing allocations and economic growth. There has been no clear explanation from the council about the link between housing and economic growth. The council have not explained where the jobs are going to come from for the people moving into the new houses, which will lead to increased commuting out of the area which will lead to a further impact on the already heavily

burdened road infrastructure. The house building needs should be carefully matched to current economic forecast. Why has the council not asked for our views on the economic goals? We want the council to explain to us where the jobs are going to come from. The National Planning Forum view is that economics should be correct before moving on to the housing ; and the economic argument is fundamental to the overall Calderdale Local plan, but the council has not consulted on this. Currently, many warehousing and other employment properties are vacant in Calderdale (currently 84 listed premises). What makes Calderdale council believe that further employment land such as the Enterprise Zone in Clifton be filled? Businesses moving from one part of Calderdale to another will just redistribute empty warehousing. It will not create economic growth. It will create unfair distribution of economic success. The planned Clifton Enterprise Zone will not help Calderdale financially as all rates will be paid to Leeds ; in fact it will impede Calderdale's wealth as if businesses move out of Calderdale rate paying premises (and those premises cannot be filled) to the planned Clifton EZ, then Calderdale will receive less money.

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 **HRU2213** Site ref (if applicable):

Person ID: **1164799** Name: **Mr Stephen Webster** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

The council have opted to increase the amount of housing in order to promote the industrial/economic growth in calderdale especially the south east of Brighouse. The plan is not realistic as this requires the development of Clifton enterprise zone and proposed road. the council since the start of consultation have found 9 suitable sites around calderdale that are suitable for housing and are on the prefered brownfield sites which should be used before Greenbelt land and thus does not require the exceptional circumstances to build on the only greenbelt south east of Brighouse. The proposed Jct 24a will not be built as stated by WYCA due to lack of funding before 2027, therefore any further increase in traffic from the M62 will compound the already congestion situation around Brighouse.

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 **HRU2216** Site ref (if applicable):

Person ID: **1164799** Name: **Mr Stephen Webster** 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:

Additional sites that would be needed to meet the increased housing requirement There are many empty warehouses and industrial sites around calderdale that can be used to provide the requirements of any new businesses without the need for the EZ, where do the council think the ez will benefit when the only businesses showing any interest are already established in calderdale and should they move to the ez their business rates will then go to Leeds, WYCA.

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 **HRU2241** Site ref (if applicable):

Person ID: **1246935** Name: **Janet Richardson** 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:

In response to the Planning Inspector examining the Calderdale Local Plan, we are putting forward potential amendments. This includes a revision to the Housing Requirement and an increased supply of sites to meet this need. We are consulting on these and also seek comments on: Sustainability Appraisal (2019) supporting the proposed changes; and the update to the Habitats Regulation Assessment. Pleasefind below my comments for thecurrent consultation. The points being asked for comment on are very selective and give the impression that there has been an agreement that the councils economic growth strategy is sound andachievable. My concern is that the economicforecastis overambitious and there will not be the need for this increased supply of housing and as such thisrisks unnecessary loss of greenbelt to attempt to meet this. If the council believes these newsites are appropriate fordevelopment and the economicgrowth strategy is overestimated, I would hope this will help reduced the size of the development proposed in the garden suburbs and minimise the loss ofgreenbelt. Brownfield sites shouldsurly be used before exceptional circumstances can be claimed to use greenbelt. I am also unaware of any involvement with Calderdaleresidents in the vision of this economic strategy. As I drove along Wakefield road today into Brighouse I saw a number of adverts for existing industrial units to let, which makes me questionwhen there are already unusedindustrialunits,are new businesses really going toarrive andoffer the number of jobs locally to support the increased housing in the way that is forecast? I am concerned that the council believes thatthe vastmajority of residents in the houses of the garden villageswill be employed locally by the Clifton Enterprise zoneand thus will not add to traffic congestion and air pollution by this development. Ibelieve this model not adequatelyevidenced and isnaiveand as suchoffering such a largedevelopment in thelimited area of Calderdaleriskssimply provide a housingdevelopment forpeople to commute easily to Leeds. The councils reports on theinvestment in the A629 corridor "driving economic growth by addressing transport andaccessibility issues along that route". This should thennegate the need for suchdisproportionatedevelopment in Brighouse and open up opportunities of development along the A629corridor for the benefit of other areasof Calderdale. The recurrent flooding in the Brighouse area is furtherevidence that thesustainability of this project is flawed. The loss of the fields in the Thornhills area above Brighouse would increase surface run off and worsen the local flooding problems. The light pollution would alsoeffect the current bat populations of this area. Overall Ibelieve the councilshould reduce the forecast of economic growth andproportionately reduce the number of houses proposed. Ibelieve the sustainability of the project is questionable andreliant onunsecured funding for infrastructure in the area of Brighouse. Ibelieve brownfield sites should be prioritised over greenbeltfor development. I believe the councilshould not be reliant on supportingthe disproportionatedevelopment in the Brighouse area in the hope that developerswill find a solution to the recurrent floodingproblems with the higher risk of worsening the problem in the process. Thank you for taking my comments into account.

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 **HRU516** Site ref (if applicable):

Person ID: **1241652** Name: **R Graham Maslen** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

The Council has complied with the general requirements of the Local Plan process but there is a question about appropriate community involvementbecause there were no working party meetings ahead of the Council's Cabinet Meeting of October 14th 2019 at which the decision to increase the housing numbers was made. Local councillors were therefore prevented from discussing the issues ahead of the Cabinet meeting.

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

Sound Reason:

I have challenged the assertion that the Plan has been positively prepared elsewhere as the Council has not evidenced its economic and employment growth forecasts, it has failed to differentiate between housing need and housing requirement and failed to justify its chosen option.

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

Duty to Co-operate Reason:

It is not clear what the Council has to do in relation to the Plan to be 'compliant' therefore how can residents in Calderdale make a judgement about something which has not been explained.

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5602891

Main Issues and Council Response

Legal Compliance

Main Issues:

1. Inappropriate community involvement, lack of local councillor involvement in discussing the issue of increasing the housing requirement.

Council's Response:

1. The update to the housing requirement has been subject to public consultation as per the relevant planning regulations whilst the volume of representations received demonstrates the community has taken the opportunity to submit its views. Calderdale Councillors discussed the proposed revisions to the Local Plan at the Cabinet Meeting of 14th October, at which local Councillors as well as the public were able to express their views.

Test of Soundness

Main Issues:

1. Council not evidenced economic/employment growth forecasts. The forecasts are too high, particularly when compared to Bradford.

2. Failed to differentiate between housing need and housing requirement.

3. Failed to justify the chosen option. Turley report based on out of date figures and generalisations.

4. The Council has not taken into consideration the Council's 'Inclusive Economic Strategy' which could potentially reduce the impact on additional housing requirement.

5. Revised housing requirement figure is still too low. The Council have ignored their own evidence. The Plan lack any flexibility for non delivery of planning permissions, windfalls or allocations.

6. Housing requirement is overstated. The Turley report is unsound as it relies on data from 2014. Brexit should be taken into account.

7. The Plan fails to engage with the climate, placemaking and sustainability implications of the proposed amendments, and is therefore neither positively prepared nor justified by the best available evidence.

8. Do not accept the modelling work which has been done to underpin the Local Plan. Increasing the housing requirement will further exacerbate the negative impacts of the draft Plan.

9. Inappropriate to plan for a review which may or may not happen. The Plan should plan for a higher level of housing now.

10. Why did the Council choose to increase its housing requirement rather than reduce economic growth assumptions?

11. Council should reduce economic assumptions and housing growth, and then redistribute planned housing more fairly around the borough. Challenge to chosen distribution, particularly regarding the Brighouse and Rastrick area and over reliance on delivery of Clifton Enterprise Zone.

Council's Response:

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

2. The current consultation document CC39 refers to the housing requirement whilst the Publication version of the Local Plan (SD 01.1) referred to housing need. References in Section 4 are to need when quoting the figure in the Publication version (derived through use of the standard method as set out in the PPG) and requirement when referring to the figure in the current consultation document which is need plus policy-on additions as explained in CC21 (and derived through use of the SHMA). This is not covered in detail in the consultation document as its purpose was to seek views on the revised housing figure following the additional research (CC21). However, given the different method of determining the housing figure compared to the Publication version of the Local Plan, the reasoned justification to Policy SD3 will be re-drafted as part of the modifications procedure to explain how the housing requirement figures was derived.

3. Explanation of the 'option' chosen is provided in CC32 (Minutes of the Cabinet Meeting – 14th October 2019) and CC37) Potential Sites – considered and rejected, November 2019 – Report on options rejected) with further evidence included in CC33 (Sustainability of Options, October 2019).

4. The Council considers that the assessments undertaken are consistent with Regional, sub regional and local growth strategies, as evidenced at Examination Stage 1 Hearings.

5. The overall HRF is only marginally below the higher figure in the Turley report due to use of the baseline economic scenario towards the end of the Plan period, reflecting the difficulties of accurately forecasting economic growth this far into the future. As the plan will be reviewed every 5 years any new evidence will inform these reviews. Through the examination process the Council is exploring the use of a stepped housing trajectory with the first part of the Plan period being lower given that notwithstanding supply a higher figure will not be delivered. Current calculations of supply demonstrate a buffer whilst assumptions around the delivery of extant planning permissions and windfalls have been conservative.

6. 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.

7. The additional allocations required to meet the revised housing requirement figure are accompanied by site specific requirements (sections 7 to 14) in order that climate, placemaking and sustainability issues are adequately addressed.

8. The Turley report was undertaken by consultants specialising in this area of work in order to further examine the relationship between economic growth and housing. Given that local authorities must provide for the housing requirement in their SHMAs, in order to have a sound plan, the Council would run the risk of the plan being found unsound should it ignore its findings. Whilst additional allocations will have impacts site specific requirements for developments, together with infrastructure improvements and additions, should mitigate these.

9. The revised HRF is significantly above that in the Publication version of the Local Plan which has to be reviewed every 5 years. Irrespective of the level of supply it is highly unlikely that a significant increase in delivery will take place in the early part of the Plan period (the 'Housing Delivery Test Action Plan' supports this view).

10.The Council's Cabinet agreed the adopted approach, which has been the subject of this consultation, following consideration of different options. (see CC31 Report to Councils cabinet – 14th October 2019 Potential Modifications to the draft Local Plan following receipt of the Planning Inspector's post stage 1 hearings letter, CC32 Minutes of the Cabinet meeting 14th October 2019, and CC33. Sustainability Appraisal of Options)
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.

11. The Council considers that the methodology adopted in the Employment Land Study (EV01) the Employment Technical Paper (EV02) and the response to the Inspector's Stage 1 MIQs (CC.01) meets the requirements of National Planning Policy Guidance and is soundly based.

The Turley report was undertaken by consultants specialising in this area of work in order to further examine the relationship between economic growth and housing. Given that local authorities must provide for the housing requirement in their SHMAs, in order to have a sound plan, the Council would run the risk of the plan being found unsound should it ignore its findings.

Duty to Co-operate

Main Issues:

Council's Response:

Suggested Modifications

1. Increase the housing requirement, to at least 1040dpa, but should be closer to 1129 (policy-on plus transport).

2. The proposed additional housing should be withdrawn.

3. There should be a more realistic jobs growth figure, consequently reducing the number of houses required.

Council's Response:

1. Given that the proposed HRF represents a significant increase on previous plans, including the Publication Draft Local Pan, the requirement to review every 5 years and the fact that increasing supply will not lead to a significant increase in delivery no further modification is proposed.

2. Given that the proposed HRF correlates with the latest evidence in the form of the Turley report no further modification is proposed.

3. The Council considers that the methodology adopted in the Employment Land Study (EV1) meets the requirements of National Planning Policy Guidance and is soundly based. The report presents a number of growth scenarios, and the most appropriate scale of growth relates to the expected jobs created by the increased accessibility and transport improvements in the West Yorkshire plus Transport Fund programme, in the context of the policy objectives of the SEP.

The revised housing requirement is based on the most up-to-date evidence produced by specialist consultants (the Turley report) and therefore no further modification is proposed.

Document Section: 4.1 Paragraph

Representations

Comment ID **HRU1390** Site ref (if applicable):

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

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

We agree that the Turley report identifies a 'policy on + transport' housing requirement of 1040dpa for the life of the plan but note also the large number of assumptions and uncertainties behind this suggested requirement. However, unless and until the Council carries out a full and fair review of its ENTIRE Economic Strategy, even the 997dpa now being proposed cannot be relied upon and must be judged to be unsound.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1506** Site ref (if applicable):

Person ID: **1244055** Name: **Mr Andrew Wood** Organisation: **Consultant Planner CPRE West Yorkshire**

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

Probably the most significant change in the policy context for the Local Plan since our September 2018 representations is the Government's commitment to net zero carbon emissions by 2050. It is fundamental to the soundness and legal compliance of the Plan that it adequately contribute to this target.The Plan period covers around half the time between now and the 2050 target, so measures must be put in place

immediately that set the required trajectory for the full 30 year period and beyond. Additional economic growth and land-use change associated with the Plan creates an additional challenge, for further carbon reduction measures beyond those needed to achieve the 2050 target on past-trend trajectories. This means that the Plan must not only include measures to achieve the 2050 target based on existing trends, but also in specific relation to the additional growth it proposes to facilitate. In CPRE's view the Plan's failure to address this, including with specific reference to additional measures to respond to climate impacts of above-trend growth in employment and housing, put the Plan at odds with the Council's obligations in relation to the Climate Change Act 2008 (2050 Target Amendment).

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

Sound Reason:

Para 2.4 of the Turley report (CC21) notes a baseline assumption that commuting rates will remain at the 2011 level. Given the pressing need to reduce car traffic, to address the climate emergency and other objectives, the crucial issue must not be the net commute (about 3,000 outward), but the gross total amount of movements resulting from it (about 55,000). This gross figure can be addressed at least in part by modal shift to rail, bus and to active modes, all of which have spatial implications for the location of new development and the types of transport investment. We agree with the Inspector's interim finding that the draft housing and employment figures do not align; and indeed we made this point in detail in earlier representations. However, as we set out previously, we consider that the employment growth ambitions ; laudable as they may be in principle, would require a level of net in-migration to Calderdale that is contingent upon major policy interventions well outside the Council's control. Simply increasing the planned housing requirement to produce a numerical match blithely ignores the fact that the new, economically active households must come from somewhere else, and no evidence has been provided to show that other local authority areas are planning for a comparable out-migration to produce the necessary supply. Revising the employment ambitions - to focus on increasing activity rates and reducing out-commuting is therefore, in our view, the only rational way to align the employment and housing numbers, and consequently we cannot support the proposed increase in planned housing requirement.

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

Duty to Co-operate Reason:

Suggested Modifications:

Revising the employment ambitions - to focus on increasing activity rates and reducing out-commuting is therefore, in our view, the only rational way to align the employment and housing numbers.

Comments:

Additional Evidence Link:

Comment ID **HRU1528** Site ref (if applicable):

Person ID: **855422** Name: **Mr Phil Kelly** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

I'm sure I'm not the only one thinking that Calderdale and Central Government should be giving serious thoughts to all housing plans ; given our recent repeated experience of severe flooding ; there is a need to review and revise all housing plans. Flood risk and protecting flood plains and our hillsides from encroachment becomes even more important!! It's time to stop and re-think all these Housing Plans and undertake a thorough revision of all risk assessments and implications for flooding. The recent weather is no longer 'exceptional', is expected to become a regular feature of our geography and needs to be specifically taken into account. The Environment Agency have been on TV explaining that there is a limit to what they can achieve - given the topography, Steep hills, narrow valleys and many water courses. We should be ensuring that no housing is built that is not definitely flood resilient as a minimum and we should avoid any building on flood plains and hillsides until we are satisfied that appropriate and adequate measures are in place.

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

Duty to Co-operate Reason:

Local Residents in the Calder Valley and especially the Upper Calder Valley have been trying to convince Calderdale, and through them Central Government, that a simplistic approach to housing and overall housing requirements in our area is irresponsible and will have serious consequences in the future.

Suggested Modifications:

I have suggested that all housing plans should be re-examined in the light of recent events and experience of serious flooding.

Comments:

Additional Evidence Link:

Comment ID **HRU1797** Site ref (if applicable):

Person ID: **1116208** Name: **Mrs Carol French Deol** 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 FOR FULL REPRESENTATION

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/5635273

Comment ID **HRU1977** Site ref (if applicable):

Person ID: **1246540** Name: **Countryside Properties** Organisation: **Countryside Properties**

Agent ID: **691692** Name: **Ms Lucie Jowett** Organisation: **Senior Planner Barton Willmore**

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

Legal Compliance Reason:

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

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION Summary Our Client agrees that the most appropriate scenario in determining the housing requirement for Calderdale is the 'policy-on with transport' economic growth aspiration. This should be applied over the whole of the plan period rather than just the first 10 years. If the Council apply the scenario to the first 10 years only then this would result in an average of only 997 dwellings per annum which would not be sufficient to deliver even the baseline job growth forecast. 2.16 The Council has clear aspirations to support the Leeds City Region LEP and so the housing target of the Local Plan will need to be sufficient to achieve the economic growth aspirations set out within the Local Plan.

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

Duty to Co-operate Reason:

Suggested Modifications:

Our Client agrees that the most appropriate scenario in determining the housing requirement for Calderdale is the 'policy-on with transport' economic growth aspiration. This should be applied over the whole of the plan period rather than just the first 10 years. If the Council apply the scenario to the first 10 years only then this would result in an average of only 997 dwellings per annum which would not be sufficient to deliver even the baseline job growth forecast.

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5632466

Comment ID **HRU1988** Site ref (if applicable):

Person ID: **855708** Name: **Barratt Homes & David Wilson Homes** Organisation: **Barratt Homes & David Wilson Homes**

Agent ID: **691692** Name: **Ms Lucie Jowett** Organisation: **Senior Planner Barton Willmore**

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

Legal Compliance Reason:

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

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION Our Client forms part a consortium of housebuilders who have submitted separate representations prepared by ourselves in relation to the proposed housing requirement. They should be read alongside these representations, which are appended to this report. In summary, the Council has identified that the most appropriate scenario in determining the housing requirement for Calderdale is the 'policy-on with transport' economic growth aspiration. Our Client agrees that this is the most appropriate scenario which identifies a requirement of 1,040 dwellings per annum. The Council has however only applied this to the first 10 years of the Plan Period, with 'baseline growth' for the last 5 years. Our Client objects to this approach which would result in only 997 dwellings per annum over the plan period, a shortfall of at least 650 dwellings over the plan period. If the Council continue with this approach then their requirement of 997 dwellings per annum would not be sufficient to deliver even the baseline job growth forecast, despite its clear aspirations to support the Leeds City Region LEP. Our Client therefore objects to the Council's revised proposed housing requirement and consider that this should be at least 1,040 dwellings per annum over the whole plan period.

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

Duty to Co-operate Reason:

Suggested Modifications:

SEE ATTACHED FOR FULL REPRESENTATION Our Client therefore objects to the Council's revised proposed housing requirement and consider that this should be at least 1,040 dwellings per annum over the whole plan period.

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5632467

Comment ID **HRU1997** Site ref (if applicable):

Person ID: **960869** Name: **Stonebridge Homes** Organisation:

Agent ID: **691692** Name: **Ms Lucie Jowett** Organisation: **Senior Planner Barton Willmore**

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

Legal Compliance Reason:

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

Sound Reason:

PLEASE SEE ATTACHED FOR FULL REPRESENTATION Our Client forms part of the consortium of housebuilders who have submitted representations in relation to the proposed housing requirement. These representations should be read alongside these representations, which are appended to this report. In summary, the Council has identified that the most appropriate scenario in determining the housing requirement for Calderdale is the 'policy-on with transport' economic growth aspiration. Our Client agrees that this is the most appropriate scenario which identifies a requirement of 1,040 dwellings per annum. The Council has however only applied this to the first 10 years of the Plan Period, with 'baseline growth' for the last 5 years. Our Client objects to this approach which would result in only 997 dwellings per annum over the plan period, a shortfall of at least 650 dwellings over the plan period. If the Council continue with this approach then their requirement of 997 dwellings per annum would not be sufficient to deliver even the baseline job growth forecast, despite its clear aspirations to support the Leeds City Region LEP. Our Client therefore objects to the Council's revised proposed housing requirement and consider that this should be at least 1,040 dwellings per annum over the whole plan period.

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

Duty to Co-operate Reason:

Suggested Modifications:

PLEASE SEE ATTACHED FOR FULL REPRESENTATION Our Client therefore objects to the Council's revised proposed housing requirement and consider that this should be at least 1,040 dwellings per annum over the whole plan period.

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5632468

Comment ID **HRU2023** Site ref (if applicable):

Person ID: **855708** Name: **Barratt Homes & David Wilson Homes** Organisation: **Barratt Homes & David Wilson Homes**

Agent ID: **691692** Name: **Ms Lucie Jowett** Organisation: **Senior Planner Barton Willmore**

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

Legal Compliance Reason:

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

Sound Reason:

These representations are submitted on behalf of a consortium of housebuilders. The housebuilders for

whom these representations are made on behalf of are Barratt and David Wilson Homes (Yorkshire) Limited, Avant Homes, Alcuin Homes, Stonebridge Homes and Persimmon Homes (West Yorkshire). PLEASE SEE ATTACHED FOR FULL REPRESENTATION The consortium agrees that the most appropriate scenario in determining the housing requirement for Calderdale is the 'policy-on with transport' economic growth aspiration. This should be applied over the whole of the plan period rather than just the first 10 years. If the Council apply the scenario to the first 10 years only then this would result in an average of only 997 dwellings per annum which would not be sufficient to deliver even the baseline job growth forecast. The Council has clear aspirations to support the Leeds City Region LEP and so the housing target of the Local Plan will need to be sufficient to achieve the economic growth aspirations set out within the Local Plan.

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

Duty to Co-operate Reason:

Suggested Modifications:

The consortium respectfully request that the proposed housing target is adjusted accordingly in light of these representations. This would result in the need to include more sites which are deliverable within the plan period. At least a further 1,676 dwellings need to be allocated on Green Belt release sites to meet the requirement of 15,600 dwellings as a minimum. This does not take account of any under delivery and so either safeguarded land or a buffer will need to be applied.

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5633062

Comment ID **HRU2025** Site ref (if applicable):

Person ID: **1185901** Name: **Avant Homes** Organisation:

Agent ID: **691692** Name: **Ms Lucie Jowett** Organisation: **Senior Planner Barton Willmore**

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

Legal Compliance Reason:

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

Sound Reason:

These representations are submitted on behalf of a consortium of housebuilders. The housebuilders for whom these representations are made on behalf of are Barratt and David Wilson Homes (Yorkshire) Limited, Avant Homes, Alcuin Homes, Stonebridge Homes and Persimmon Homes (West Yorkshire). PLEASE SEE ATTACHED FOR FULL REPRESENTATION The consortium agrees that the most appropriate scenario in determining the housing requirement for Calderdale is the 'policy-on with transport' economic growth aspiration. This should be applied over the whole of the plan period rather than just the first 10 years. If the Council apply the scenario to the first 10 years only then this would result in an average of only 997 dwellings per annum which would not be sufficient to deliver even the baseline job growth forecast. The Council has clear aspirations to support the Leeds City Region LEP and so the housing target of the Local

Plan will need to be sufficient to achieve the economic growth aspirations set out within the Local Plan.

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

Duty to Co-operate Reason:

Suggested Modifications:

The consortium respectfully request that the proposed housing target is adjusted accordingly in light of these representations. This would result in the need to include more sites which are deliverable within the plan period. At least a further 1,676 dwellings need to be allocated on Green Belt release sites to meet the requirement of 15,600 dwellings as a minimum. This does not take account of any under delivery and so either safeguarded land or a buffer will need to be applied.

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5633062

Comment ID **HRU2027** Site ref (if applicable):

Person ID: **961885** Name: **Alcuin Homes** Organisation:

Agent ID: **691692** Name: **Ms Lucie Jowett** Organisation: **Senior Planner Barton Willmore**

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

Legal Compliance Reason:

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

Sound Reason:

These representations are submitted on behalf of a consortium of housebuilders. The housebuilders for whom these representations are made on behalf of are Barratt and David Wilson Homes (Yorkshire) Limited, Avant Homes, Alcuin Homes, Stonebridge Homes and Persimmon Homes (West Yorkshire). PLEASE SEE ATTACHED FOR FULL REPRESENTATION The consortium agrees that the most appropriate scenario in determining the housing requirement for Calderdale is the 'policy-on with transport' economic growth aspiration. This should be applied over the whole of the plan period rather than just the first 10 years. If the Council apply the scenario to the first 10 years only then this would result in an average of only 997 dwellings per annum which would not be sufficient to deliver even the baseline job growth forecast. The Council has clear aspirations to support the Leeds City Region LEP and so the housing target of the Local Plan will need to be sufficient to achieve the economic growth aspirations set out within the Local Plan.

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

Duty to Co-operate Reason:

Suggested Modifications:

The consortium respectfully request that the proposed housing target is adjusted accordingly in light of

these representations. This would result in the need to include more sites which are deliverable within the plan period. At least a further 1,676 dwellings need to be allocated on Green Belt release sites to meet the requirement of 15,600 dwellings as a minimum. This does not take account of any under delivery and so either safeguarded land or a buffer will need to be applied.

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5633062

Comment ID **HRU2029** Site ref (if applicable):

Person ID: **960869** Name: **Stonebridge Homes** Organisation:

Agent ID: **691692** Name: **Ms Lucie Jowett** Organisation: **Senior Planner Barton Willmore**

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

Legal Compliance Reason:

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

Sound Reason:

These representations are submitted on behalf of a consortium of housebuilders. The housebuilders for whom these representations are made on behalf of are Barratt and David Wilson Homes (Yorkshire) Limited, Avant Homes, Alcuin Homes, Stonebridge Homes and Persimmon Homes (West Yorkshire). PLEASE SEE ATTACHED FOR FULL REPRESENTATION The consortium agrees that the most appropriate scenario in determining the housing requirement for Calderdale is the 'policy-on with transport' economic growth aspiration. This should be applied over the whole of the plan period rather than just the first 10 years. If the Council apply the scenario to the first 10 years only then this would result in an average of only 997 dwellings per annum which would not be sufficient to deliver even the baseline job growth forecast. The Council has clear aspirations to support the Leeds City Region LEP and so the housing target of the Local Plan will need to be sufficient to achieve the economic growth aspirations set out within the Local Plan.

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

Duty to Co-operate Reason:

Suggested Modifications:

The consortium respectfully request that the proposed housing target is adjusted accordingly in light of these representations. This would result in the need to include more sites which are deliverable within the plan period. At least a further 1,676 dwellings need to be allocated on Green Belt release sites to meet the requirement of 15,600 dwellings as a minimum. This does not take account of any under delivery and so either safeguarded land or a buffer will need to be applied.

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5633062

Comment ID **HRU2031** Site ref (if applicable):

Person ID: **1185995** Name: **Persimmon Homes (West Yorkshire)** Organisation:

Agent ID: **691692** Name: **Ms Lucie Jowett** Organisation: **Senior Planner Barton Willmore**

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

Legal Compliance Reason:

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

Sound Reason:

These representations are submitted on behalf of a consortium of housebuilders. The housebuilders for whom these representations are made on behalf of are Barratt and David Wilson Homes (Yorkshire) Limited, Avant Homes, Alcuin Homes, Stonebridge Homes and Persimmon Homes (West Yorkshire). PLEASE SEE ATTACHED FOR FULL REPRESENTATION The consortium agrees that the most appropriate scenario in determining the housing requirement for Calderdale is the 'policy-on with transport' economic growth aspiration. This should be applied over the whole of the plan period rather than just the first 10 years. If the Council apply the scenario to the first 10 years only then this would result in an average of only 997 dwellings per annum which would not be sufficient to deliver even the baseline job growth forecast. The Council has clear aspirations to support the Leeds City Region LEP and so the housing target of the Local Plan will need to be sufficient to achieve the economic growth aspirations set out within the Local Plan.

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

Duty to Co-operate Reason:

Suggested Modifications:

The consortium respectfully request that the proposed housing target is adjusted accordingly in light of these representations. This would result in the need to include more sites which are deliverable within the plan period. At least a further 1,676 dwellings need to be allocated on Green Belt release sites to meet the requirement of 15,600 dwellings as a minimum. This does not take account of any under delivery and so either safeguarded land or a buffer will need to be applied.

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5633062

Comment ID **HRU2074** Site ref (if applicable):

Person ID: **1246735** Name: **Mark Mullany** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

The Parish Council recognises the importance of having a Local Plan adopted to meet the future needs of communities including housing and employment in a sustainable way. To this end it is understood that it is necessary for the Local Plan to be found 'sound' in terms of national planning guidance at its examination in public by the Planning Inspector. However, while the proposals do not impact directly on the Stainland Parish, the extent of Green Belt loss proposed for new housing at 4 sites in Greetland and Elland is considered excessive and unsustainable both in terms of loss of natural environment and landscape character and also in terms of the vastly increased burden it would place on local infrastructure, including the road network, local health services and schools. The road network which would serve these sites already suffers from long standing congestion problems with its attendant economic, social and environmental impacts for everyone in the area including people in the Stainland Parish needing to travel via West Vale to Halifax, or other locations. The Saddleworth Road area of Greetland where the 4 large additional housing sites are proposed is poorly served by public transport and while more housing could in theory increase viability of services, these will continue to be unattractive if congestion problems are exacerbated by large scale development. The Parish Council understands that the levels of employment growth projected by CMBC need to be matched by appropriate levels of housing provision. However, it is noted that CMBC has recognized the many uncertainties associated with long term economic projections and as a result has factored in a reduced level of provision over the last five years of the plan (910 per annum for last five years compared to 1,040 per annum for first ten years). The Parish Council would advocate this approach be extended further, such that further reductions in the housing figure could be made to reflect uncertainty beyond the first five year period at which point a review of the Plan will be due.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2162** Site ref (if applicable):

Person ID: **1240800** Name: **Mrs Samantha Dabek** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

I am firstly objecting to the unrealistic employment growth suggested by the plan. Just shy of 10,000 jobs in a 15 year period is a pie-in-the-sky number for the area, with insufficient evidence to support where this growth will come from. The employment numbers modelled do not take into account the % of people from outside the area that could take these roles. From the soci-economic assessment of Clifton, there was 34.2% leakage of roles to people outside of Calderdale. Another flaw is the employment landscape, which is very much in a position of increasing automation and efficiencies ; not employing more heads. In summary, the housing numbers should be reflective of the employment numbers AFTER leakage. Businesses should be CONSULTED about their growth plans in terms of headcount. I suggest a reduction in employment growth.

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 **HRU2182** Site ref (if applicable):

Person ID: **1243954** Name: **Mr Edward Drury** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

I object to the Council's strategy to select the highest level of job growth possible to calculate how many new homes should be built in Calderdale. Specifically associated with this, I have severe objections to the excessive allocation of homes for Brighouse. This is unnecessary for the following reasons:- "¢ The overall job target is too high, misguided and not achievable. The current direction in economic policy is to focus on productivity. For me as a business this means increasing automation, identifying efficiencies and reducing carbon emissions. Whilst I agree that some jobs will be created, this will be much more limited over coming years. The council's high growth approach can therefore be questioned. "¢ We are constantly challenged by customers to reduce costs and seek to do this by increasing productivity through investment in automation or new plan and equipment where budgets allow. "¢ Business support is following this same direction. Grant funding available to businesses from WYCA has moved away from job creation to productivity in line with the priorities of the new Local Industrial Strategy (LIS). The Council's selected economic growth strategy does not align with these changes. "¢ The economic strategy relies on significant road building which will increase traffic movements and commuting which is at odds with climate

emergency and carbon reduction priorities at a local, regional and national level. "¢ The council ' s economic strategy is unsound and needs to be modified to take a more realistic and measured approach based on emerging changes in business growth and policy direction. This will avoid over provision of land, including significant releases of green belt, and a reliance on uncertain assumptions. In relation to the above, I therefore object to the need to increase overall housing numbers from 840 homes per year to 997 per year over the next 15 years. Of key concern to me is the level of growth planned for Brighouse (5168 homes), the fact that a further 200 homes have been added through the latest changes and the severe impact the proposed Woodhouse Garden Suburb (LP1451) will have on my business and other existing businesses directly downstream of this excessive allocation. The level of development proposed is unacceptable for the town and needs to be reduced for the following reasons:- "¢ The town will be increased by a third of its current size overloading an already clogged road system and adding to issues of flood risk "¢ Brighouse is still taking the highest level of homes (35%), more than Halifax which is the largest commercial centre and more than its fair share. This needs to be distributed more evenly across the authority in line with the settlement hierarchy. "¢ Significant highway constraints already exist. This impacts on accessibility and creates time delays for both business vehicles (HGV) and staff to and from my premises from the main highway network, through Brighouse and onto the strategic motorway network. This affects our daily operations and impacts on commercial viability and consequently productivity. "¢ The only access from my premises to the wider highway network in Brighouse is via Birds Royd Lane. Birds Royd Lane runs from the intersection with Huddersfield Road (A641) to Woodhouse Lane, a total length of approximately 800m. The road serves numerous industrial units and it is largely trafficked by Heavy Goods Vehicles (HGV). "¢ HGV traffic generated from existing businesses in the area is set to increase over the coming years to allow us to achieve higher productivity. "¢ Given that businesses have not been adequately consulted, I would question whether our traffic growth has been factored into the transport modelling undertaken for the town to establish the true impact this will have on the road network. "¢ Birds Royd Lane provides the key gateway to my business and the Birds Royd industrial area. It is in a severe state of repair. This does not provide a satisfactory impression for potential investors visiting the industrial area and shows both businesses and the council in a negative light as a place to do business with. I am aware that this road is the most complained about road in the authority and yet there are no plans to resolve this through the local plan via the Infrastructure Delivery Plan. Full works are apparently estimated at Â£1.5m. How does this support business growth, increased productivity and the council's economic strategy? The existing businesses that support Calderdale's economy are being failed at the expense of new employment sites. "¢ Traffic build up occurs at the junction of Birds Royd with Huddersfield Road throughout the day and this is made worse by traffic queuing down the A641 on the approach to Brighouse. This delays business traffic and reduces our efficiencies, impacting on overall productivity. Queues at Birds Royd Lane junction onto Huddersfield Road add significant time delays due to traffic light signalling and this is added to by the location of the railway car park and volume of residents travelling from Woodhouse to Brighouse (this is an easier route than trying to get out of Daisy Road and is quicker than queuing in traffic down Huddersfield Road into Brighouse). "¢ As Birds Royd Lane is located between the 1257 homes proposed on the Woodhouse Garden Suburb (Ref LP 1451), 24 homes at Woodhouse Lane (Ref LP1000) and 100 homes at the junction of Birds Royd (Re LP 0571) this issue and the impact on my business will increase as traffic volumes and movements increase down this already inadequate industrial access route. "¢ If this isn't bad enough, I am at a loss as to how the council think they are going to put a significant new distributor road through the Garden Suburb to take traffic away from Brighouse and direct it through the industrial area and over Huntington Bridge as the information suggests. Has anyone been down here? This is ill thought out - there is no space to do this without impacting on businesses and it would be unsafe to mix residential and industrial traffic. As a business and landowner here why am I not being consulted on the potential impact? "¢ There is no evidence to confirm that the required infrastructure improvements or funding are in place to resolve these issues. The A641 improvement proposals are still at scoping stage, without even outline business case. "¢ Flooding is of critical concern to the businesses along River Street including my own. The area is located in high risk flood plain and suffers

from both fluvial and pluvial (surface water) flooding issues. We are sandwiched between the river and positioned directly downstream of the Woodhouse Garden Suburb (LP1451). The majority of the latter is vulnerable to surface water flooding due to the ground conditions as referenced in the si te promoter's drainage assessment. "¢ My business was flooded in 2015 and as recently as the 9 th and 15 th March 2020 we have to deploy large water pumps to pump water out of the overwhelmed drains at the end of River St, or from the beck at the rear of the 12 terraced houses, into the river during prolonged heavy rainfall. We also put up flood barriers to all factory / office roller shutter doors and staff entrances. Additionally, all internal factory drains leading externally have to be blocked off or fitted with non-return valves in the event of imminent flooding. "¢ During the last few weeks of heavy rainfall there is a significant volume of water flowing down from the Woodhouse fields, under the railway line and surging into the beck at the back of our factory and the adjoining 12 terraced houses. When the river level is higher than the flap valve outlet this water backs up into the field at the rear of the houses and is only kept at bay by the deployment of the pumps managed by our flood warden at all hours of day or night. Without this urgent action the properties and our business would flood! This water course is already creating huge problems and at the very least requires diverting away from the properties and business to an outlet further down the river. Any future building work on the Woodhouse fields would clearly exacerbate the problem of already insufficient drainage. "¢ We need more trees planting on Woodhouse not houses! Trees are valued for the beauty and many other benefits they bring to our landscapes and neighbourhoods. Trees are increasingly recognized for their importance in managing runoff. Their leaf canopies help reduce erosion caused by falling rain. They also provide surface area where rain water lands and evaporates. Roots take up water and help create conditions in the soil that promote infiltration. "¢ I am aware that flood modelling has now been commissioned by the Environment Agency as a result of the evidence I have provided to them about the fact the data was out of date and incorrect. Until revised data is available and updated, the flood risk evidence on which the local plan is based is therefore flawed. "¢ Our drainage consultant indicates that the building of any fluvial flood defences to address issues in Brighouse will not take place until 2023, taking into account the need to develop a full business case. The phasing and level of development in the town can therefore be questioned until the details of this are fully understood. "¢ In addition, in terms of pluvial issues there is currently a lack of knowledge around this. Flood alleviation for this is shown as a phase 3 scheme for which there are no timelines at all yet and yet we are downstream of a site with these particular issues.

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/5634612

Comment ID **HRU22** Site ref (if applicable):

Person ID: **1117915** Name: **Mr Neil Moore** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

My comments are not necessary about the plan in its entirety, but is specific to an area of land opposite land Ref LP1033 - land off Toothill Bank I am the owner of the land twixt Toothill Bank and Long Ridge (postcode HD6 3EZ / HD6 3RZ) The land in question boundaries up against 3No (three) previous successful planning applications 1. 80/02843/OUT & 81/00215/RES 37 Toothill Bank Rastrick Brighouse HD6 3EZ 2. 92/00604 5No Detached dwellings on land off Long Ridge HD6 3RZ 3. 01/00341/FUL & 03/01847/FUL land at 37 Toothill Bank Rastrick Brighouse HD6 3EZ We fully understand the GN4 policy (landscaping / trees) and this was taken into consideration with the successful development of the 5No detached properties passed back in 1992 and can still clearly be seen on site today that their remains significant woodland in and around the built properties. My comment and request focuses on the land adjacent 37 Toothill Bank and that we have drafted a anumber of schemes in order to provide additional dwellings, whilst not only maintaining the landscaped area but also enhancing the area by discreetly blending in any new dwellings without major loss to the existing landscape and addressing the need to maintain some open space and additional tree planting around the land in question. I would welcome your review of this land in order to allocate this has additional housing site so that we can engage with Calderdale Council and work in collaboration to provide an housing scheme both appropriate for the land and area and also acceptable to Calderdale Council I look forward to your review and response Many thanks

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

Sound Reason:

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2224** Site ref (if applicable):

Person ID: **1246930** Name: **Woodhouse Residents Association** Organisation: **Woodhouse Residents Association**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

See attachment

Do you consider the plan to be Sound?:

Sound Reason:

See attachment

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5635134 ; http://calderdale-consult.objective.co.uk/file/5635135 ; http://calderdale-consult.objective.co.uk/file/5635136

Comment ID **HRU2231** Site ref (if applicable):

Person ID: **1181961** Name: **Mrs Julie Bullen** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

See attached

Do you consider the plan to be Sound?:

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/5635148

Comment ID **HRU2238** Site ref (if applicable):

Person ID: **1184942** Name: **Mr Mark Bullen** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

See attached

Do you consider the plan to be Sound?:

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/5635184

Comment ID **HRU2316** Site ref (if applicable):

Person ID: **855422** Name: **Mr Phil Kelly** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

THIS COMMENT WAS RECEIVED AFTER THE CLOSURE OF THE REPRESENTATION PERIOD. Given the recent national experience of serious flooding and the predicted long term changes to local and regional weather conditions, and in the context of clear statements from the CEO of The Environment Agency, I suggest that it would be wise to call a 'pause' to all Housing and Local Plan activity until such time as a through independent review is completed re all flood risk and coastal encroachment assessments is undertaken. His recommendation to Central and Local Government is that we should not be building in flood risk areas at all unless there is confidence that adequate prevention, protection and resilience plans are actually in place. He also suggests that in some areas people should be assisted to move in the expectation that their properties will continue to be subject to regular flooding. An admission by the EA re the limitations of their efforts when confronted by typography like ours in the Calder Valley and persisting wet weather predictions for the future suggests that the current simplistic imperative of build, build, build and weakening of planning restrictions and conditions is foolish and will inevitably bring dire consequences. Calderdale is a prime example of where there should be a revision of house building plans in the new context and a challenge back to Government re the expectations placed upon them re numbers of new builds. I would also suggest that no further housing plans should be agreed without a clear flood risk assessment and mandatory conditions on developers/builders re flood prevention and resilience measures within all plans. That isn't to say that there isn't a need for more affordable housing in our area. But most of new properties being planned and built are not affordable and, meanwhile, we are failing to take advantage of vacant and brown field sites ; some of which are being held on to by speculative developers and which could be subject to compulsory purchase to free them up for creative new approaches to flood

resistant and resilient housing styles as utilised elsewhere in Europe (e.g. Holland).

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Main Issues and Council Response

Legal Compliance

Main Issues:

1. The Government has now committed to net zero carbon emissions by 2050. The Plan must reflect this. It's failure to do so is in conflict with the Council's obligations in relation to the Climate Change Act 2008 (2050 Target Amendment).

Council's Response:

1. Whilst it is imperative that the commitment to net zero emissions is pursued vigorously this commitment was given by Government after the Plan had reached this advanced stage and after the NPPF and PPG upon which it is based were drafted. The Plan does contain policies for adaptation and mitigation to Climate Change. A modification to amend paragraph 10.2 of the Local Plan to reflect the latest Government target has already been included in the Council's working list of modifications.

Test of Soundness

Main Issues:

1. The Council needs to carry out a full and fair review of its entire Economic Strategy.

2. The Council should rethink the Local Plan given recent flood events.

3. No evidence which supports an increase in economically active households moving into Calderdale to support the economic growth ambitions.

4. Economic ambitions should be revised to focus on increasing activity rates and reducing out commuting.

5. Rationale for choosing the highest level of employment growth has not been fully explained or justified.

6. There has been no public consultation on the range of employment growth options.

7. It is not realistic or reasonable for the employment growth targets to exceed those of Bradford - a much larger neighbouring authority.

8. The proposed housing requirement should be at least 1040 dpa over the whole plan period.

Council's Response:

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

2. The NPPF makes it clear that 'inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere'. Supported by the Calder Catchment Strategic Flood Risk Assessment 2016 (SFRA), the Local Plan is focused upon managing flood risk from all sources and applying a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change.

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

4. as 3) above

5. as 3) above. Further information was presented in the Council's response to the Inspectors Stage 1 Hearing Matters, Issues and Questions (CC.01)

6. 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).

7. as 3) above

8. The revised HRF is significantly above that in the Publication version of the Local Plan which has to be reviewed every 5 years. Irrespective of the level of supply it is highly unlikely that a significant increase in delivery will take place in the early part of the Plan period (the 'Housing Delivery Test Action Plan' supports this view).

Duty to Co-operate

Main Issues:

Council's Response:

Suggested Modifications

1. The Plan should be re-examined in light of recent flooding events.

2. Economic ambitions should be revised to focus on increasing activity rates and reducing out commuting.

3. The Calderdale employment growth target should be set to a more realistic and achievable level, in proportion with other parts of the country, and in recognition of the uncertainties which prevail.

4. The 1,040 dpa figure should be applied for the full plan period.

Council's Response:

1. The NPPF makes it clear that 'inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere'. Supported by the Calder Catchment Strategic Flood Risk Assessment 2016 (SFRA), the Local Plan is focused upon managing flood risk from all sources and applying a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change.

2/3. The Council considers that the methodology adopted in the Employment Land Study (EV1) meets the requirements of National Planning Policy Guidance. The approach uses the Regional Econometric Model which is a complex economic database and impact model for Yorkshire and Humber, and data in the model consists of historical employment, output, productivity, population estimates and forecasts, and other labour market and environmental information. The Model provides a consistent database which underpins the economic policies of the LEP and other Districts in the Leeds City Region. No modification is proposed.

4. The revised HRF is significantly above that in the Publication version of the Local Plan which has to be reviewed every 5 years. Irrespective of the level of supply it is highly unlikely that a significant increase in delivery will take place (the 'Housing Delivery Test Action Plan' supports this view). No further modification is proposed.

Document Section: Table 1 Calderdale Local Plan Revised Housing Requirement Figur

Representations

Comment ID **HRU1202** Site ref (if applicable):

Person ID: **1120241** Name: **Mr Ben Sykes** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

The majority of residents are not aware of this latest phase of consultation, I only found out due to local residents making people aware. The council are trying torush througha flawed plan using very outdated forecasts of economic and population growth (which are out of line with the declaration of a Climate emergency and post Brexit Britain) without working with communities to understand the true requirements of the borough. The plan is supposed to improve Calderdale for all residents, not simply line bow to the pressures of development companies.

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

Sound Reason:

The world and the UK have changed dramatically since this plan was originally conceived. The belated recognition of a climate emergency and the seismic shift brought about by Brexit have shattered the foundations on which this plan has been based. The impact of Brexit means previous population growth forecasts now woefully over estimate likely growth scenarios. The reality of a climate emergency means that economic growth aspirations must be severely curtailed. The decision of Calderdale council to increase the borough's housing numbers to match their outdated and overly ambitious economic strategy(for which their is no mandate) beggars belief and highlights the degree of incompetency within the areas of the council making such decisions. The only sensible option available was to reduce economic growth forecasts. Not reducing economic growth forecasts has undermined the council's principle argument for proposing the garden suburbs. These vast housing sites (proposed to be built on the steep slopes of the Calder valley which must be avoided due to the now obvious (Ciara and Dennis!!) impacts of climate change on flooding) were originally proposed due to the supposed lack of alternative sites within the borough. Now the flaws in Calderdale's industrial site allocation calculations have been exposed the solution they have proposed has undermined the arguments they used to justify the starting point of the local plan - that the only option was the Garden suburbs as other sites were unavailable. The plan is fundamentally flawed because: - it applies an economic growth target for which there is no mandate and which is incompatible with a climate emergency - it assumes a much higher population growth than is now realistic in post Brexit Britain in the middle of a climate emergency - it places an unsupportable amount of growth in South East Calderdale which requires an unfeasible expectation on infrastructure improvements which are simply unsupportable - it neglects to consider the infrastructure improvements that are being made elsewhere in Calderdale (e.g. the A629 Halifax to Huddersfield Corridor Improvement which is the largest individual scheme within the West Yorkshire-plus Transport Fund: https://www.westyorks-ca.gov.uk/projects/west-yorkshire-plus-transport-fund/a629-huddersfield-to-halifax/) which further undermine any argument that South East Calderdale is the only area that should be developed at a meaningful scale. - it proposes large developments on the steep slopes of the Calder Valley which makes no sense now the full impacts of climate change are becoming clear (with storms like Ciara and Dennis

becoming much more common). The economic forecast (and therefore the housing needs) of the plan require a full reassessment based on 2020 Britain. If that were done, the requirements would fundamentally change.

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

Duty to Co-operate Reason:

There has been a lack of cooperation between Calderdale and bordering local authorities which has resulted in a lack of understanding of the inter dependencies between the respective proposals which all plan to focus heavy development in areas adjacent to South East Calderdale. Kirklees have planned large industrial and housing sites very close to junction 25 of the M62 and there are no infrastructure plans that can accommodate even of the the councils proposals, never mind both.

Suggested Modifications:

The economic forecast (and therefore the housing needs) of the plan require a full reassessment based on 2020 Britain. If that were done, the requirements would fundamentally change.

Comments:

Additional Evidence Link:

Comment ID **HRU1381** Site ref (if applicable):

Person ID: **980588** Name: **Mr Mark Baxendale** Organisation:

Agent ID: **960432** Name: **Mrs Charlotte McKay** Organisation: **Principal IOP Consulting**

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

Legal Compliance Reason:

Please see attached letter

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

Sound Reason:

Councils are required to produce a local plan which is -“sound"Paragraph 182 of the old NPPF provides: -“The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is -“sound"namely that it is: Positively prepared ; the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development; Justified ; the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence; Effective ; the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and Consistent with national policy ; the plan should enable the delivery of sustainable development in accordance with the policies in the Framework."The Planning Advisory Service has also published -“Soundness Self-Assessment Checklist"(March 2014). This guidance enables the preparation of a robust Local Plan which is positively prepared, justified, effective and consistent with National Policy. The Soundness checklist

advices that in terms of being -“ justified "the plan should be based on a robust and credible evidence base involving: Research/fact finding: the choices made in the plan are backed up by facts; Evidence of participation of the local community and others having a stake in the area. In terms of the plan being the most appropriate strategy when considered against reasonable alternatives, the Soundness Checklist advices that these alternatives should be realistic and subject to sustainability appraisal. The plan should show how the policies and proposals help to ensure that the social, environmental and resource use objective of sustainability will be achieved. The proposed plan is not justified. These new housing numbers are not backed by facts and the evidence is lacking. The draft Local Plan does not provide a strategy which will, as a minimum meet as much as possible for the area's objectively assessed needs. There is no flexibility within the plan to adapt to change contrary to the NPPF. The plan is not -“sound"In accordance with the NPPF. Please also see the attached letter.

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

Duty to Co-operate Reason:

We consider that the Council have seriously failed in their duty to cooperate given the fact that they seem to have given no consideration to the developments within Kirklees which will be relying on the same infrastructure as the proposed large allocations, upon which this plan is so reliant.

Suggested Modifications:

The housing requirement should be increased to match the evidence available. Also less reliance should be placed upon the two large garden suburbs and the allocations should be more evenly spread across the whole area. Furthermore, the site allocations threshold of 0.25ha is too low and smaller sites should be allocated to allow for flexibility and to ensure that the plan is not reliant on large sites which will struggle to be delivered within the plan period.

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5609779

Comment ID **HRU1406** Site ref (if applicable):

Person ID: **1243983** Name: **Mr Martin Hey** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

Unclear

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

Sound Reason:

My analysis shows that the Local Plan Revision will not significantly improve living standards in Calderdale. With no Development Need visible, and with the three Sustainable Development objectives of the NPPF not met, expansion of the Plan above Baseline should not proceed. Baseline: Calderdale's population in 2018 was 210,000. Turley estimates Baseline Growth at 17,827, an 8.5% rise. The BoE long term GDP growth forecast stands at 1.5% per annum, equivalent to a 25% cumulative rise between 2018 and 2033.

(Caveat: this is a nationwide figure not achieved in Yorkshire and Humberside in recent years. However, with government focus on geographical rebalancing it is reasonable to believe this could be achieved with the correct policies). Assuming the above, this would equate to an increase in GDP/capita of 15.2% over the period of 2018-33. Given current demographic trends, Calderdale's population will rise in line with Baseline projections, and as such more homes are required. Policy-On Option (all figures shown are for the Turley 15 Year Option): Under the Baseline scenario, Calderdale will have c120,000 jobs by 2033. The Policy-On option will increase this figure by 2,527 (Turley) ; a 2.11% increase. Baseline population in 2033 is expected to be 227,827. The Policy-On option will increase population by 4,491 (Turley) ; a 1.97% increase. GDP growth per capita linked specifically to the Policy-On option over the 15 year period is therefore 0.14% . In other words, the -“Policy-On"□option delivers 100 times less Economic Benefit to the residents of Calderdale than the Baseline initiative. Taking into account the undesirable elements of this small GDP boost (increased NHS treatment of traffic accident and air pollution casualties, flood alleviation and clean up activity) the additional development will certainly not be beneficial to the Borough . Implicit Assumptions: The main assumption in this scenario is that the GVA per capita of new jobs created will be similar to that of existing jobs. There are reasons why this is reasonable: Existing jobs in Calderdale have a GVA per capita that is very similar to the Leeds City Region average (Â£20,950 v Â£21,341). So inward migration of people and jobs into the Borough is very likely to be at the same level. In certain circumstances, agglomeration benefits can occur. However, this is generally in areas with high population density ; it is unlikely to occur in Greetland, for example. In using a GDP/capita lens, there is an assumption that increased absolute level of GDP has limited value. There is evidence to support this, as population forecasts suggest that 80% of inward migration to Calderdale will come from internal migration ; in practice, people coming from neighbouring boroughs. Across the region, this is (by definition) a zero-sum game. Calderdale's below average GVA/capita performance would if anything indicate that additional jobs should be based outside the Borough to drive additional economic activity. The assumption that the value of house building across Calderdale is homogenous is clearly a simplifying assumption ; building in areas such as Northowram and Shelf will drive up economic activity in Bradford and Leeds as much as Calderdale. This increase in out-commuting would leave the council in the worst possible position ; they will need to provide services to residents who don't benefit economic activity in the borough ; further draining limited council resources. Summary The Baseline scenario does establish a Development Need, in terms of improving living standards and providing enough housing for residents. The Policy-On scenario: Does not establish a Development Need ; living standards for Calderdale residents will not improve; Does not deliver Sustainable Development objectives ; the quality of life for Calderdale residents will suffer due to increased vehicle traffic, pollution and accidents, pressure on public services and increased flooding risk; Will inflict significant environmental damage on the borough, in terms of landscape, wildlife and heritage; And as such, creates adverse impacts that significantly and demonstrably outweigh the benefits of any development. So, by the terms of the NPPF, the -“Policy-on"□option cannot proceed, either in its original 15 Year Turley form or as part of the Council's 10 Year proposal.

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

Duty to Co-operate Reason:

Suggested Modifications:

The Policy-On scenario: Does not establish a Development Need ; living standards for Calderdale residents will not improve; Does not deliver Sustainable Development objectives ; the quality of life for Calderdale residents will suffer due to increased vehicle traffic, pollution and accidents, pressure on public services and increased flooding risk; Will inflict significant environmental damage on the borough, in terms of landscape, wildlife and heritage; And as such, creates adverse impacts that significantly and demonstrably outweigh the benefits of any development. So, by the terms of the NPPF, the -“Policy-on"□option cannot proceed, either in its original 15 Year Turley form or as part of the Council's 10 Year proposal.

Comments:

Additional Evidence Link:

Comment ID **HRU1698** Site ref (if applicable):

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:

The principal problems with the Draft Plan's approach to deriving the housing requirement, as amended by the changes proposed in this consultation, are:- Turley acknowledge (CC21, Modelling the economic implications of the proposed housing requirement, August 2019, version as amended by the Council, para. 2.19) that to support job growth, a higher level of population growth will be required than the starting-point projections. No evidence is offered about where this might come from. We support the comments on this critical evidential gap submitted by Andrew Wood (CPRE). Transport for the North (Connectivity and Labour Markets in the Northern Powerhouse, May 2018), using equally reputable consultants (SDG Economic Development and Cambridge Econometrics), showed that the working age population for Yorks & Humber is expected to be flat to 2040, while the North West and the North East show declines (source: ONS 2014-based subnational population projections, though more recent data should now be available). This important point has previously been made by Anthony Rae (Friends of the Earth). The Leeds City Region SEP is nonetheless predicated on significant working-age population growth. We would like to support the Council's aspirational approach to job numbers, but are able to so only as far is there is evidence to demonstrate deliverability. The Draft Local Plan itself confirms a reduction of 5200 in the working age population. Turley (CC21 App.1) confirm their modelling assumption that the population simply grows either to link to the jobs available or to the housing available. Without evidence it is not credible. Turley (CC21 App. 1) assume a fixed commuting ratio, while the Transport for the North report projects the relative growth of higher-skill jobs, a decline in low and medium skill jobs, and also evidences the increased propensity to commute of holders of higher-skill jobs. The effect of this factor on the housing requirement has not been considered by Turley. Turley (CC21 App.1) use the assumption that unemployment will remain at its current record low. It has the merit of simplicity, but no credibility. It is accepted though that the Council has made a crude attempt to allow for uncertainty by reducing the housing requirement for the last 5 years of the Plan. The Draft Plan as it stands does not offer sufficiently robust evidence to support the assessed housing requirement. The population and job growth numbers should be re-visited with a dose realism.

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

Duty to Co-operate Reason:

Suggested Modifications:

The Council should revisit the population and job projections in order to build a solid base for the housing requirement.

Comments:

Additional Evidence Link:

Comment ID **HRU1972** Site ref (if applicable):

Person ID: **1028087** Name: **Mr Luke Axe MRTPI** Organisation: **Keyland Developments Ltd**

Agent ID: **962361** Name: **Mr Andrew Rose** Organisation: **Spawforth Associates**

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

Keyland welcomes the changes to the housing requirement being proposed through the Housing Requirement Update and Potential Supply consultation. This action addresses to some extent the Inspector's Post Hearing Letter (INS07), which stated that the Local Plan's provision for housing did not support the ambitions for economic growth. However, Keyland do note that the Council identified a higher housing requirement in the Turley 2019 report. The Modelling shows that to support the 'policy-on plus transport' economic growth forecast the housing requirement identified by Turley was 1,040 dwellings per annum (dpa). Keyland note that the Council arrived at the decision for the current proposed housing requirement via the consideration of a number of options at the Council's Cabinet meeting on 14 October 2019. The outcome of this meeting shows a figure of 1,040 dpa for the first 10 years of the Plan, which reduces in the last 5 years to 910 dpa. This creates an average of 997 dpa, which is broadly the 1,001 dpa identified by the Inspector. Keyland understands that the reduction in the last five years of the Plan is due to the complexity of modelling this far ahead and the uncertainty in a number of assumptions,including economic activity and household formation. The Council therefore considers that it is most appropriate to continue with the Turley baseline scenario in relation to planning for the 2028-2033 but undertake a review prior to this to capture any further increase in housing. Keyland may question the approach to deriving the housing requirement, but in relation to the overall number of new homes being planned Keyland consider this is an improvement, which largely reflects the annual housing requirement identified by the InspectorTable 2 of the consultation paper shows that the sources of the housing land supply are: Housing Requirement 14,950 Extant planning permissions 1,888 Windfalls 1,294 Allocations 11,882 Total Supply 15,064 Buffer 114 This shows that there is an overall difference between the requirement and supply of 114 dwellings. Keyland is supportive that the overall level of housing allocations has increased and includes their site at Saddleworth Road, Greetland (LP0952)

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/5632461 ; http://calderdale-consult.objective.co.uk/file/5632462

Comment ID **HRU1974** Site ref (if applicable):

Person ID: **1094576** Name: **Mr Brian Reynolds** Organisation: **Gleeson Homes Ltd**

Agent ID: **1104252** Name: **Mr Mark Eagland** Organisation: **Peacock & Smith**

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

Legal Compliance Reason:

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

Sound Reason:

Gleeson Regeneration note that the Housing Requirement Update consultation paper proposes an amended housing requirement that is in line with the Turley 'policy-on' economic modelling for the first 10 years of the plan period (1,040 dpa), but for the last five years the requirement is reduced to 'baseline job growth' (910 dpa). The Council's justification for this is that there is uncertainty about the extent to which modelling assumptions can be relied on, and in any event the plan will have been reviewed before the final five years of the plan period. Gleeson Regeneration consider that the Council should apply the Turley 'policy on' recommendations for the full plan period. Planning Practice Guidance advises that where stepped housing requirements are proposed Strategic policy-makers will need to set out evidence to support this approach, and not seek to unnecessarily delay meeting identified development needs. In this context our concerns are that: i) insufficient evidence has been provided to justify a reduced housing requirement after 10 years. The sole justification given at this stage is uncertainty about modelling assumptions, but all housing requirement modelling necessitates assumptions about certain variables; ii) the poor track record of housing delivery in Calderdale indicates that it may not be easy to increase the supply of housing in the event that a future plan review requires housing to be greater than baseline job growth. The stepped housing requirement approach may therefore delay meeting identified housing needs, contrary to Government objectives to significantly boost the supply of housing (Para 59 of the NPPF); iii) the reduction in housing supply towards the end of the plan period may hinder job growth because the quantum of employment proposed for allocation in the Local Plan (97 hectares) exceeds the top end of the range recommended in the Lichfield Employment Land Study. We note that the Council is not currently proposing to scale back employment land provision in line with the reduced housing requirement. Our view is therefore that the approach recommended in the Housing Requirement Update paper is not positively prepared, justified, effective or consistent with national policy. It is unsound. In order to make the housing requirement approach sound our view is that the 1,040 dpa figure should be applied for the full plan period.

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

Duty to Co-operate Reason:

Suggested Modifications:

The 1,040 dpa figure should be applied for the full plan period

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5632463

Comment ID **HRU20** Site ref (if applicable):

Person ID: **953094** Name: **Mrs Joanne Clayton** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

The Calderdale Plan targets for housing (based on pre-Brexit demographic evidence for Objectively Assessed Need (OAN)) mean that the Green Belt as identified in the current UDP has had to be reviewed. The OAN is far too great and as it relates to out-of-date population projections used in Strategic Housing Market Assessment that have been superseded by lower projections in more recent Office of National Statistics releases that would result in a much lower housing target and the reduce the need to release the number of Green Belt sites. The Government's Housing White Paper 'Fixing our Broken Housing Market' contains a number of proposals to reform and simplify the planning system and advised that further consultation on specific issues would follow. On 14 September DCLG released a consultation on a proposed approach to adopting a standard method for calculating local housing need. This consultation also sets out the Government's ambition to publish a revised National Planning Policy Framework in Spring 2018 (i.e before the adoption of the Council's plan). The expectation is for local planning authorities to adopt the proposed method when assessing housing need and in calculating housing land supply. The 'Housing need consultation data table' sets out the housing need for each local planning authority using the DCLG proposed method. It sets a figure for 840 per annum for Calderdale for illustrative purposes. The data informing this new method is based on the most up-to-date information available at the date of the consultation document. The housing need figures published are based on the 2014-based household projections (published July 2016) and 2016 house price-to-earnings ratios (published March 2017). These are latest, up-to-date figures. The household projections are updated every two years. The consultation also notes that whilst these figures represent the minimum number of homes needed in a local authority, Councils may decide to deliver more housing due to economic growth ambitions. The consultation signposts a direction of policy travel, on behalf of the Secretary of State. Set against the existing Plan target of 1,169 the difference of 329 per annum (1,169 ; 840) the need for Green Belt release is reduced by 5,264 dwellings over the plan period. Accordingly, sites in the existing Green Belt should be removed from the Plan as the exceptional circumstances for their release do not exist.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2009** 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 REPRESENTAION The Council's decision to support the 'policy on' employment scenario modelled by Turley but then only apply this to the first 10 years of the plan period is unjustified and not consistent with national policy. Furthermore it is clear that there is not an absence of suitable sites to deliver the housing requirement identified in the Turley report. Indeed, as these representations demonstrate, Persimmon is in control of currently rejected sites which are in sustainable locations, technically developable, and capable of delivering approximately 190 homes. To be found Sound, the emerging Local Plan must be based on a minimum housing requirement of 1,040 dpa (15,600 for the plan period).

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

Duty to Co-operate Reason:

Suggested Modifications:

To be found Sound, the emerging Local Plan must be based on a minimum housing requirement of 1,040 dpa (15,600 for the plan period).

Comments:

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

Comment ID **HRU2021** Site ref (if applicable):

Person ID: **961958** Name: **Crosslee plc** Organisation: **Crosslee plc**

Agent ID: **1104252** Name: **Mr Mark Eagland** Organisation: **Peacock & Smith**

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

Legal Compliance Reason:

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

Sound Reason:

Crosslee note that the Housing Requirement Update consultation paper proposes an amended housing requirement that is in line with the Turley 'policy-on' economic modelling for the first 10 years of the plan period (1,040 dpa), but for the last five years the requirement is reduced to 'baseline job growth' (910 dpa). The Council's justification for this is that there is uncertainty about the extent to which modelling assumptions can be relied on, and in any event the plan will have been reviewed before the final five years of the plan period. Crosslee consider that the Council should apply the Turley 'policy on' recommendations for the full plan period. Planning Practice Guidance advises that where stepped housing requirements are proposed Strategic policy-makers will need to set out evidence to support this approach, and not seek to unnecessarily delay meeting identified development needs. In this context our concerns are that: i) insufficient evidence has been provided to justify a reduced housing requirement after 10 years. The sole justification given at this stage is uncertainty about modelling assumptions, but all housing requirement modelling necessitates assumptions about certain variables; ii) the poor track record of housing delivery in Calderdale indicates that it may not be easy to increase the supply of housing in the event that a future plan review requires housing to be greater than baseline job growth. The stepped housing requirement approach may therefore delay meeting identified housing needs, contrary to Government objectives to significantly boost the supply of housing (Para 59 of the NPPF); iii) the reduction in housing supply towards the end of the plan period may hinder job growth because the quantum of employment proposed for allocation in the Local Plan (97 hectares) exceeds the top end of the range recommended in the Lichfield Employment Land Study. We note that the Council is not currently proposing to scale back employment land provision in line with the reduced housing requirement. Our view is therefore that the approach recommended in the Housing Requirement Update paper is not positively prepared, justified, effective or consistent with national policy. It is unsound. In order to make the housing requirement approach sound our view is that either the 1,040 dpa figure should be applied for the full plan period, or the quantum of employment land proposed in the plan should be reduced to correspond with the lower amount of housing sought in the last five years of the plan period. Changes Required to Make Housing Requirement Figure Sound The 1,040 dpa figure should be applied for the full plan period, or the quantum of employment land proposed in the plan should be reduced to correspond with the lower amount of housing sought in the last five years of the plan period

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

Duty to Co-operate Reason:

Suggested Modifications:

The 1,040 dpa figure should be applied for the full plan period, or the quantum of employment land proposed in the plan should be reduced to correspond with the lower amount of housing sought in the last five years of the plan period

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5632940

Comment ID **HRU2042** Site ref (if applicable):

Person ID: **1246643** Name: **Martin Walsh Associates** Organisation:

Agent ID: **1182209** Name: **Miss Rachel Flounders** Organisation: **ID Planning**

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION Table 1 identifies a revised housing figure for Calderdale of 14,950 dwellings (997 dpa). This is based on the 'policy-on plus transport growth' scenario for the first ten years of the plan and the 'baseline growth' scenario for the final five years of the plan period. We support the Council's approach and the revised housing requirement figure of 14,950 dwellings.

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/5633572

Comment ID **HRU2044** Site ref (if applicable):

Person ID: **1140304** Name: **Joanne Harding** Organisation: **Local Plans Manager - North Home Builders Federation**

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 Council have decided to apply the 'policy-on plus transport' (1,040dpa) for the first 10 years to 2027/28 and the 'baseline growth' scenario (910dpa) for the period 2028/29 to 2032/33. Thus, giving a figure of 14,950 overall, equating to an average of 997dpa. The HBF consider that this increase in housing requirement is an improvement, however, it remains unclear as to why the Council did not choose just to take forward the 1,040dpa proposed by the Turley evidence. If the Council have concerns around the certainty of the figures used to determine this figure in the longer term this could be addressed during a future review of the Plan to determine if the housing requirement is still appropriate.

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/5633159

Comment ID **HRU2101** Site ref (if applicable):

Person ID: **1182211** Name: Organisation: **Thornhill Estates**

Agent ID: **1182209** Name: **Miss Rachel Flounders** Organisation: **ID Planning**

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION Table 1 identified a revised housing figure for Calderdale of 14,950 dwellings (997 dpa). This is based on the 'policy-on plus transport growth' scenario for the first ten years of the plan and the 'baseline growth' scenario for the final five years of the plan period. We support the Council's approach and the revised housing requirement figure.

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/5633670

Comment ID **HRU2242** Site ref (if applicable):

Person ID: **960824** Name: **Strata Homes** Organisation:

Agent ID: **960827** Name: **Emma Lancaster** Organisation: **Quod Ltd**

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 Strata continue to support the objective to deliver a single Local Plan for the Borough. However, Strata is concerned with the proposed level of new housing being planned for in the HRUPS. These representations are focused on the following aspects: "¢ The proposed housing requirement1 (at 997 dwellings per annum (-“dpa"[?]) does not reflect an evidence based approach or national guidance. "¢ The proposed housing requirement will not match the employment forecasts for the Borough and as a result will impose constraints on the Borough's growth potential. "¢ Government is committed to fundamentally delivering more housing and delivering economic growth. The proposed housing requirement is contrary to this objective. Strata are concerned there may be further delay in progressing the Local Plan given that the proposed housing requirement may not address the fundamental concerns raised by the Inspector during the Stage 1 Hearing Sessions. Strata continue to support the objective to deliver a single Local Plan for the Borough. However, Strata is concerned with the proposed level of new housing being planned for in the HRUPS. Strata support the adoption of the higher housing requirement of at least 1,040 dpa. This will ensure that: "¢ The Plan is reflective of the CMBC's own evidence based approach and national guidance "¢ The proposed housing requirement will match the employment forecasts for the Borough and will not impose constraints on the Borough's growth potential. "¢ The Plan will align with Government's commitment to fundamentally delivering more housing and delivering economic growth. "¢ Address the fundamental concerns raised by the Inspector. "¢ Reduce any further delay of in adopting the new Local Plan.

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

Duty to Co-operate Reason:

Suggested Modifications:

Strata support the adoption of the higher housing requirement of at least 1,040 dpa. This will ensure that: "¢ The Plan is reflective of the CMBC's own evidence based approach and national guidance "¢ The proposed housing requirement will match the employment forecasts for the Borough and will not impose constraints on the Borough's growth potential. "¢ The Plan will align with Government's commitment to fundamentally delivering more housing and delivering economic growth. "¢ Address the fundamental concerns raised by the Inspector. "¢ Reduce any further delay of in adopting the new Local Plan.

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5635260

Comment ID **HRU2243** Site ref (if applicable):

Person ID: **961885** Name: **Alcuin Homes** Organisation:

Agent ID: **1128721** Name: **Mr Alistair Flatman** Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

PLEASE SEE ATTACHED FOR FULL REPRESENTATION It is noted the latest consultation seeks comments on the revised housing requirement and an increased supply of sites to meet the increased housing requirement. The 15 year housing requirement is increased from 12,600 to 14,950 dwellings (2018/19 ; 2032/33) equating to 997 dwellings per annum. In order to meet this increase, additional sites have been identified, amounting to 1,996 dwellings, with an oversupply of 114 dwellings above the requirement. However it is considered not enough sites have been identified and as such the Local Plan is unsound as it fails to deliver sufficient flexibility and buffer for the plan period. It is noted that the Government's Housing Delivery Test 2019 was published in Feb 2020. This identifies a need for Calderdale to deliver a 20% buffer. It is also noted that in 2020 the Housing Delivery Threshold will increase from 45% (2019) to 75%. Whilst completions for 2019/2020 are unknown at this stage, if next year's completions remain similar to 18/19 then this would have significant consequences for Calderdale with a very reasonable prospect that the presumption in favour of sustainable development would be triggered. As such it is important that the Local Plan ensures sufficient deliverable sites are allocated ; the site at Stoney Lane, Brighouse should therefore be allocated for residential purposes. We therefore raise objection on the basis that the plan is unsound given the lack of flexibility and suitable buffer. As such there are clear grounds for the site at Stoney Lane to be allocated for residential use

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

Duty to Co-operate Reason:

Suggested Modifications:

Site at Stoney Lane, Brighouse (ref LP0022) should be allocated for residential development

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5635265 ; http://calderdale-consult.objective.co.uk/file/5635266 ; http://calderdale-consult.objective.co.uk/file/5635269

Comment ID **HRU2324** Site ref (if applicable):

Person ID: **954577** Name: **Mr M Bretton** Organisation:

Agent ID: **229408** Name: **Mr Jonathan Dunbavin** Organisation: **Associate I D Planning**

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION Table 1 identified a revised housing figure for Calderdale of 14,950 dwellings (997 dpa). This is based on the 'policy-on plus transport growth' scenario for the first ten years of the plan and the 'baseline growth' scenario for the final five years of the plan period. We support the Council's approach and the revised housing requirement figure.

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/5636962

Comment ID **HRU2326** Site ref (if applicable):

Person ID: **1119222** Name: **Ms Jean Caine** Organisation:

Agent ID: **229408** Name: **Mr Jonathan Dunbavin** Organisation: **Associate I D Planning**

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION Table 1 identified a revised housing figure for Calderdale of 14,950 dwellings (997 dpa). This is based on the 'policy-on plus transport growth' scenario for the first ten years of the plan and the 'baseline growth' scenario for the final five years of the plan period. We support the Council's approach and the revised housing requirement figure.

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/5636962

Comment ID **HRU2328** Site ref (if applicable):

Person ID: **11779** Name: **Mr Mark Beevers** Organisation: **Harron Homes Ltd**

Agent ID: **229408** Name: **Mr Jonathan Dunbavin** Organisation: **Associate I D Planning**

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION Table 1 identified a revised housing figure for Calderdale of 14,950 dwellings (997 dpa). This is based on the 'policy-on plus transport growth' scenario for the first ten years of the plan and the 'baseline growth' scenario for the final five years of the plan period. We support the Council's approach and the revised housing requirement figure.

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/5636962

Comment ID **HRU2330** Site ref (if applicable):

Person ID: **1062367** Name: **Mr Peter Hartley** Organisation:

Agent ID: **229408** Name: **Mr Jonathan Dunbavin** Organisation: **Associate I D Planning**

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION Table 1 identified a revised housing figure for Calderdale of 14,950 dwellings (997 dpa). This is based on the 'policy-on plus transport growth' scenario for the first ten years of the plan and the 'baseline growth' scenario for the final five years of the plan period. We support the Council's approach and the revised housing requirement figure.

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/5636962

Comment ID **HRU24** Site ref (if applicable):

Person ID: **1134645** Name: **Mr Anthony Mott** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

N/A -I am not commenting on the degree to which the proposal is legally compliant

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

Sound Reason:

Calderdale has a large proportion of green belt land within its boundary. This makes it difficult to identify acceptable sites for construction without building on green belt land. I appreciate that the council is stuck between a rock and a hard place in developing a local plan. However, the increase in the target for the number of dwellings is unacceptable when balanced against the environmental impact of such development on green belt land / woodland and the impact on existing residents. The primary benefit of living within Calderdale is the amount of green space. The more that this critial asset is eroded, the less appealing Calderdale becomes as a place to live. If I wanted to live in an urban sprawl I would move to Bradford or Leeds.

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

Duty to Co-operate Reason:

N/A - I am not commenting on this element of the plan

Suggested Modifications:

The DPA requirement overall should be reduced and/or the timing of development in Greetland should be considered alongside the A629 works and development of Elland railway station

Comments:

Additional Evidence Link:

Comment ID **HRU314** Site ref (if applicable):

Person ID: **1241575** Name: **Mrs Margaret Clayton** 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 Calderdale Plan targets for housing as we are coming out of the European Union the housing volume should be less resulting in a much lower housing target and reduce the need to release the number of Green Belt sites.

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

Duty to Co-operate Reason:

Suggested Modifications:

N/A

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5593693

Comment ID **HRU319** Site ref (if applicable):

Person ID: **1242326** Name: **Head of Operations James Clay Sons** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Housing Requirements and Job Growth Strategy ; Sections 2,3,4.1, 5.3 There appears to be an excessive allocation of development / new homes for Brighouse. Our understanding is that homes in the town will be increased by 5,168 homes. This will overload an already clogged road system. Our HGV traffic is set to increase having already increased by 100% since we moved 3 years ago. The only access for us to the M62 is via Birds Royd Lane which is already serviced by numerous business units. Congestion and increased waiting times at the intersection with Huddersfield roads is the result. As Birds Royd is located between various proposed developments (Ref LP 1451, LP1000, LP 0571) I expect we will see an increase in traffic through this inadequate route. There is no evidence to confirm that the required infrastructure improvements or funding are in place to resolve these issues. I understand the A641 improvement proposals is still at scoping stage, without even an outline business case. As a business we need to bring down our overheads and this requires improving productivity through efficiency, investment, and grant applications. We are not predicting an increase in employment as a result of this. Grant funding available to businesses from WYCA has moved away from job creation to productivity in line with the priorities of the new Local Industrial Strategy (LIS). I don't believe the Council's selected economic growth strategy aligns with these changes. Flooding is of concern to us. The area is in a high-risk flood plain and suffers from both fluvial and pluvial (surface water) flooding issues. We are sandwiched between the river and positioned directly downstream of the Woodhouse Garden Suburb proposed development (LP1451). Much of the latter is vulnerable to surface water flooding due to the ground conditions as referenced in the site promoter's drainage assessment. Flood alleviation for this is shown as a phase 3 scheme for which there are no timelines at all, and yet we are downstream of a site with these issues. Mill Royd Street Mixed Use allocation - Sections 5 and 7 At the sake of repeating my points earlier in my letter this development would have adverse consequences for our business because of the following reasons; This is in a high flood risk area which if developed could have severe impacts downstream for our business. Has this been tested and integrated into the modelling or is that yet to be undertaken? It would add to traffic issues,

impacting on accessibility to our business for our employees. All bar three of them access work by driving. Mill Royd Street is a bottleneck. Traffic builds up significantly at both ends of the street due to traffic light sequencing (preference being given to Huddersfield Road traffic flow) and the volume of traffic on Briggate.

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

Duty to Co-operate Reason:

Consultation arrangements - Section 1 Our business was not aware of the local plan and the development proposals planned for Brighouse until December 2019. No consultation was conducted with us. We were made aware of these developments by a local resident association. These proposals would only add to the issues I have already outlined. Has the Council consulted with local businesses and if so, how many have responded?

Suggested Modifications:

Our understanding is that homes in the town will be increased by 5,168 homes. This will overload an already clogged road system. Our HGV traffic is set to increase having already increased by 100% since we moved 3 years ago. The only access for us to the M62 is via Birds Royd Lane which is already serviced by numerous business units. Congestion and increased waiting times at the intersection with Huddersfield roads is the result. As Birds Royd is located between various proposed developments (Ref LP 1451, LP1000, LP 0571) I expect we will see an increase in traffic through this inadequate route. There is no evidence to confirm that the required infrastructure improvements or funding are in place to resolve these issues. I understand the A641 improvement proposals is still at scoping stage, without even an outline business case. Flooding is of concern to us. The area is in a high-risk flood plain and suffers from both fluvial and pluvial (surface water) flooding issues. We are sandwiched between the river and positioned directly downstream of the Woodhouse Garden Suburb proposed development (LP1451). Much of the latter is vulnerable to surface water flooding due to the ground conditions as referenced in the site promoter's drainage assessment. Flood alleviation for this is shown as a phase 3 scheme for which there are no timelines at all, and yet we are downstream of a site with these issues.

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5599780

Comment ID **HRU777** Site ref (if applicable):

Person ID: **1242648** Name: **Mrs Phillipa Dixson** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

I would like to make some comments and raise an objection on the Council's additional consultation around the changes to the submitted Publication Draft Calderdale Local Plan. I represent Hallmark Cards

Plc's Brighouse Distribution Centre, which is located on River Street, Brighouse. The main activity of the Distribution Centre (-"DC"[?]is the distribution of Greeting Card and Gift Presentation items to retailers across the country. In addition, the DC also houses the manufacture of gift-wrap for Hallmark. The DC employs 78 people, drawn from across the region. Hallmark is a large employer in Brighouse and in the Bradford area. As an internationally recognised brand, it brings prestige to the area, as well as contributing to the local economy through the provision of employment. In order for the DC to perform to the expectations of its very exacting customer contracts, an efficient logistics flow is crucial; we require uninterrupted, easy access to the major road networks for our products to reach customers within contracted time. In addition, the productivity of our employees is key to our ability to deliver our distribution and manufacturing activities within budget and on time. It is therefore vital that our staff are able to reach and access their place of work on time, every day. My objections are as follows; Housing Requirement and Job Growth Strategy My key objection is over the plan to increase the overall housing numbers from 840 to 997 per annum over the next fifteen years. The road infrastructure in Brighouse is already creaking, with significant delays already experienced by our distribution partners and colleagues coming into and out of the town. Birds Royd Lane is the only access point for Hallmark's DC, and as it is located between the 1,257 homes proposed on the Woodhouse Garden Suburb (LP 1451) and additional houses on Woodhouse Lane (LP 1000) and the junction of Birds Royd (LP 0571), will inevitably be impacted by an increase in traffic volumes. Outside of those homes referred to above, those planned elsewhere in the town will add to the already clogged infrastructure, leading to increased pollution and further exacerbating traffic delays. Any delay to our out- or inbound traffic poses a risk to both our productivity and to our ability to comply with our contractual obligations, which in turn could result in significant cost increases and the loss of contracts, which in turn would put a strain on the viability of Hallmark's DC as a going concern in Brighouse. My other main concern is over the increased risk of flooding posed by the plan changes. The DC's location on River Street is on a high-risk flood plain, located downstream of the Woodhouse Garden Suburb. The floods of 2015 and those experienced in February 2020 in the Calder Valley led to widespread disruption in the area, causing in- and outbound traffic delays and as a result, impacting on both our ability to service our customers and on productivity. I am concerned about the robustness of the flood modelling data upon which the local plan is based. I understand that new data has been commissioned but has not been taken into account as yet. As a result, I am highly concerned about the flood risk to our business of a plan which is based upon data which is at present out of date and incorrect. I have seen no evidence to suggest that the flood risk assessment is based on anything but flawed data. Any flood damage or water ingress into the grounds of the DC and the surrounding roads would have a huge impact on our productivity, pose significant health and safety risks and compromise our ability to fulfil customer contracts, again threatening our ability to survive as a going concern in Brighouse. For the reasons outlined above and the significant detrimental impact it would have on my business, I find the plan's changes unsound.

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 **HRU796** Site ref (if applicable):

Person ID: **1242486** Name: **Mr Ian Thurley** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Consultation arrangements - Section 1 I was not aware of the Local Plan and the significant development proposals planned for Brighouse until now. Furthermore, I only know about this current consultation following an alert from local residents, it is not because of the Council's communication efforts. The planned proposals will have a significant impact on my business and would add to the issues I already experience. It is disappointing that whilst the Council are forging ahead with an excessive employment growth strategy that they have not felt it necessary to discuss these plans with existing businesses to understand the impacts it will have. My business already contributes significant growth and prosperity to the Calderdale economy and in linewith current national direction, we are focusing on increasing productivity to strengthen this further. The council's plans will not support this. My main priority is running my business and ensuring its ongoing viability as a significant employer in Brighouse. Dealing with day to day operations makes it very difficult to engage with concerns beyond this such as the local plan consultation. Unless information is handed to me directly and is easily accessible it can easily pass me by. The Council appears to have totally failed to recognise the different pressures on the business community and the need to consult according and this is unsound. I would be interested to know how many businesses have actually responded to the plan and what specific efforts the council has made in this respect to gain a meaningful response.

Do you consider the plan to be Sound?:

Sound Reason:

Calderdale Local Plan Changes - Additional Consultation I am writing to make comments on the Council's additional consultation about the changes to the submitted Publication Draft Calderdale Local Plan. My business is located on Foundry Street, off Birds Royd Lane in Brighouse. We are the UK's largest manufacturer of welded wire mesh, manufacturing over 18,000 tonnes of mesh annually. We produce high security mesh fencing panels for the Ministry of Justice and the Ministry of Defence, specialist rebound fences for sports facilities, general wire fencing panels for industrial premises and various types of industrial mesh for use in a variety of other manufacturing processes. We currently export around 15% of our output to various countries around Europe and Scandinavia, but also as far afield as Singapore and Australia. We currently employ 53 people and operate a 5-day, 24 hour factory at our Brighouse base. As you may appreciate, 18,000 tonnes of mesh production annually translates into around 1,500 articulated HGV's visiting our site each year; all accessing and leaving Birds Royd Lane via its junction with Huddersfield Road. In addition, the vast majority of our employees travel to and from work by car on a daily basis, adding another 80 or so vehicles to the traffic passing through the same junction each day. On top of that we have regular visitors to site including customers, suppliers and support businesses. In all, I would estimate that there are 25,000 vehicles passing through the Huddersfield Road / Birds Royd Lane junction relating to business with Siddall & Hilton Products Ltd each year. As such, access to a smooth flowing road network to and from the M62 is vital to our continued competitive operation in Brighouse and current levels of congestion over the Calder are regularly disruptive to the smooth operation of the business, causing delays for people and goods. My objections are as follows:- Consultation arrangements - Section 1 I was not aware of the Local Plan and the significant development proposals planned for Brighouse until now. Furthermore, I only know about this current consultation following an alert from local residents, it is not because of the Council's communication efforts. The planned proposals will have a significant impact on my business and would add to the issues I already experience. It is disappointing that whilst the Council

are forging ahead with an excessive employment growth strategy that they have not felt it necessary to discuss these plans with existing businesses to understand the impacts it will have. My business already contributes significant growth and prosperity to the Calderdale economy and in linewith current national direction, we are focusing on increasing productivity to strengthen this further. The council's plans will not support this. My main priority is running my business and ensuring its ongoing viability as a significant employer in Brighouse. Dealing with day to day operations makes it very difficult to engage with concerns beyond this such as the local plan consultation. Unless information is handed to me directly and is easily accessible it can easily pass me by. The Council appears to have totally failed to recognise the different pressures on the business community and the need to consult according and this is unsound. I would be interested to know how many businesses have actually responded to the plan and what specific efforts the council has made in this respect to gain a meaningful response. Housing Requirement and Job Growth Strategy - Sections 2, 3, 4.1, 5.3 I object to the Council's strategy to select the highest level of job growth possible to calculate how many new homes should be built in Calderdale. Specifically associated with this, I have severe objections to the excessive allocation of homes for Brighouse. This is unnecessary for the following reasons:- The overall job target is too high, misguided and not achievable. The current direction in economic policy is to focus on productivity. For my business this means increasing automation, identifying efficiencies and reducing carbon emissions. Whilst I agree that some jobs will be created, this will be much more limited over coming years. The council's high growth approach can therefore be questioned. As an example, following a recent MBO, the business is now focused on an ambitious programme of growth, which will see material flows into and out of the business increase by at least 25% in the next 1-3 years as we expand our customer base and product ranges. However, a 25% growth in output is only expected to generate a 10-15% increase in headcount (i.e. at most another 8 jobs). This does not match up to the council's ambitions. Business support is following this same direction. Grant funding available to businesses from WYCA has moved away from job creation to productivity in line with the priorities of the new Local Industrial Strategy (LIS). The Council's selected economic growth strategy does not align with these changes. The economic strategy relies on significant road building which will increase traffic movements and commuting which is at odds with climate emergency and carbon reduction priorities at a local, regional and national level. The council's economic strategy is unsound and needs to be modified to take a more realistic and measured approach based on emerging changes in business growth and policy direction. This will avoid over provision of land, including significant releases of green belt, and a reliance on uncertain assumptions. In relation to the above, I therefore object to the need to increase overall housing numbers from 840 homes per year to 997 per year over the next 15 years. Of key concern to me is the level of growth planned for Brighouse (5,168 homes), the fact that a further 200 homes have been added through the latest changes and the severe impact the proposed Woodhouse Garden Suburb (LP1451) will have on my business and other existing businesses directly downstream of this excessive allocation. The level of development proposed is unacceptable for the town and needs to be reduced for the following reasons:- The town will be increased by a third of its current size overloading an already clogged road system and adding to issues of flood risk. Brighouse is still taking the highest level of homes (35%), more than Halifax which is the largest commercial centre and more than its fair share. This needs to be distributed more evenly across the authority in line with the settlement hierarchy. Significant highway constraints already exist. This impacts on accessibility and creates time delays for both business vehicles (HGV) and staff to and from my premises from the main highway network, through Brighouse and onto the strategic motorway network. This affects our daily operations and impacts on commercial viability and consequently productivity. Congestion and the resulting journey time is already proving to be a significant barrier to recruiting the best employees in the Yorkshire region. These plans will only make that worse. The only access from my premises to the wider highway network in Brighouse is via Birds Royd Lane. Birds Royd Lane runs from the intersection with Huddersfield Road (A641) to Woodhouse Lane, a total length of approximately 800m. The road serves numerous industrial units and it is largely trafficked by Heavy Goods Vehicles (HGV). HGV traffic generated from existing businesses in the area is set to increase over the coming years to allow us to achieve higher productivity. As noted above, my calculations indicate that

there are already 25,000 vehicle interactions at the Huddersfield Road / Birds Royd Lane junction generated by my business annually. Our growth plans will require an additional 750 HGV interactions per annum through that junction en route to and from the M62. Given that businesses have not been adequately consulted, I would question whether our traffic growth has been factored into the transport modelling undertaken for the town to establish the true impact this will have on the road network. Birds Royd Lane provides the key gateway to my business and the Birds Royd industrial area. It is in a severe state of repair. This does not provide a satisfactory impression for potential investors visiting the industrial area and shows both businesses and the council in a negative light as a place to do business with. I am aware that this road is the most complained about road in the authority and yet there are no plans to resolve this through the local plan via the InfrastructureDelivery Plan. Full works are apparently estimated at Â£1.5m. How does this support business growth, increased productivity and the council's economic strategy? The existing businesses that support Calderdale's economy are being failed at the expense of new employment sites. Traffic build up occurs at the junction of Birds Royd with Huddersfield Road throughout the day and this is made worse by traffic queuing down the A641 on the approach to Brighouse. This delays business traffic and reduces our efficiencies, impacting on overall productivity. Queues at Birds Royd Lane junction onto Huddersfield Road add significant time delays due to traffic light signalling and this is added to by the location of the railway car park and volume of residents travelling from Woodhouse to Brighouse (this is an easier route than trying to get out of Daisy Road and is quicker than queuing in traffic down Huddersfield Road into Brighouse). As Birds Royd Lane is located between the 1,257 homes proposed on the Woodhouse Garden Suburb (Ref LP 1451), 24 homes at Woodhouse Lane (Ref LP1000) and 100 homes at the junction of Birds Royd (Re LP 0571) this issue and the impact on my business will increase as traffic volumes and movements increase down this already inadequate industrial access route. If this isn't bad enough, I am at a loss as to how the council think they are going to put a significant new distributor road through the Garden Suburb to take traffic away from Brighouse and direct it through the industrial area and over Huntington Bridge as the information suggests. Has anyone been down here? This is ill thought out - there is no space to do this without impacting on businesses and it would be unsafe to mix residential and industrial traffic. There is no evidence to confirm that the required infrastructure improvements or funding are in place to resolve these issues. The A641 improvement proposals are still at scoping stage, without even outline business case. Flooding is of critical concern to the businesses along River Street including my own on Foundry Street. The area is located in high risk flood plain and suffers from both fluvial and pluvial (surface water) flooding issues. We are sandwiched between the river and positioned directly downstream of the Woodhouse Garden Suburb (LP1451). The majority of the latter is vulnerable to surface water flooding due to the ground conditions as referenced in the site promoter's drainage assessment. My business came close to being flooded in 2015 and again this last weekend. In order to mitigate the risk to the business we have had to remove production capacity from the buildings on the lowest part of our site and now have significant parts of the site that we are currently unable to utilise, leading to a sub-optimal utilisation of our premises. An increased risk of flooding will likely mean a further retreat of operations to ground higher up Foundry Street. I am aware that flood modelling has now been commissioned by the Environment Agency as a result of the evidence I have provided to them about the fact the datawas out of date and incorrect. Until revised data is available and updated, the flood risk evidence on which the local plan is based is therefore flawed. Our drainage consultant indicates that the building of any fluvial flood defences to address issues in Brighouse will not take place until 2023, taking into account the need to develop a full business case. The phasing and level of development in the town can therefore be questioned until the details of this are fully understood. In addition, in terms of pluvial issues there is currently a lack of knowledge around this. Flood alleviation for this is shown as a phase 3 scheme for which there are no timelines at all yet and yet we are downstream of a site with these particular issues. Mill Royd Street Mixed Use allocation - Sections 5 and 7 I addition to the above, I object to the additional 200 homes being allocated in Brighouse on site LP0573 (Mill Royd Street). This too is located in a high flood risk area which if developed could have severe impacts downstream for my business. This has not been tested yet and needs to be fully integrated into the modelling that is being

undertaken. It would add to traffic issues in the centre which impact on access for my employees and our hauliers. Mill Royd Street is a bottleneck. Traffic builds up significantly at both ends of the street due to traffic light sequencing (preference being given to Huddersfield Road traffic flow) and the volume of traffic on Briggate. These issues would need to be resolved in any scheme For the reasons outlined and the severe impact it will have on my business I find the plan's changes unsound

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Main Issues and Council Response

Legal Compliance

Main Issues:

1. Ineffective consultation with businesses and residents.

2. The Plan is based on outdated forecasts of employment and population growth.

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. see under soundness 3)

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.

Test of Soundness

Main Issues:

1. The housing requirement figure is unacceptable given the environmental impact and impact on residents.

2. The housing requirement should be lower given the UK is out of the EU, reducing the need to release

Green Belt sites.

3. Object to increase in housing figures. Employment forecasts should be revisited.

4. Object to increase in housing figures due to increased risk of flooding and impact on local road network in Brighouse.

5. Economic growth target is incompatible with a climate emergency.

6. The growth focused in South East Calderdale requires which requires an unfeasible expectation on infrastructure improvements which are unsupportable.

7. The Plan neglects to consider infrastructure improvements made elsewhere, which undermines the argument that SE Calderdale is the only area that should be developed at a meaningful scale.

8. The Plan proposes development on steep slopes which in view of the climate emergency, are not appropriate.

9. Revised housing requirement figure is still too low. The Council have ignored their own evidence. The Plan lack any flexibility for non delivery of planning permissions, windfalls or allocations.

10. The Policy-on scenario does not establish a development need, does not deliver sustainable development objectives, will cause significant environmental damage, and will therefore create adverse impacts which outweigh benefits of any development.

11. The Turley Report states that to support job growth, a higher level of population growth will be required than the starting-point projections. No evidence is offered about where this might come from.

12. Transport for the North (Connectivity and Labour Markets in the Northern Powerhouse, May 2018), showed that the working age population for Yorks & Humber is expected to be flat to 2040 (source: ONS 2014-based subnational population projections, though more recent data should now be available). The Leeds City Region SEP is nonetheless predicated on significant working-age population growth.

13. Challenge assumption and evidence that population growth is linked to jobs available or to housing available.

14. Turley (CC21 App. 1) assume a fixed commuting ratio, while the Transport for the North report projects the relative growth of higher-skill jobs, a decline in low and medium skill jobs, and also evidences the increased propensity to commute of holders of higher-skill jobs. The effect of this factor on the housing requirement has not been considered by Turley.

15. Turley (CC21 App.1) use the assumption that unemployment will remain at its current record low. It has the merit of simplicity, but no credibility. It is accepted though that the Council has made a crude attempt to allow for uncertainty by reducing the housing requirement for the last 5 years of the Plan.

16. The Council should apply the Turley 'policy on' recommendations for the full plan period.

Council's Response:

1. 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

accompanying Infrastructure Development Plan sets out the infrastructure requirements to address the impacts of growth whilst the site selection process has considered and addressed the environmental effects of the increased housing requirement figure.

2. 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.

3.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 LEP. 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).

4. The NPPF makes it clear that 'inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere'. Supported by the Calder Catchment Strategic Flood Risk Assessment 2016 (SFRA), the Local Plan is focused upon managing flood risk from all sources and applying a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change.
As part of infrastructure considerations the impact of development on the local road network (including in Brighouse) has been taken into consideration as part of the site assessment process. Detailed Information on transport infrastructure is contained in the WSP Technical Reports (EV54.1 – EV54.12) in the Local Plan Examination Library.

5. In order to address the challenge of Climate Change the national and international economies need rebalancing towards the 'Green Economy or 'Green Industrial Revolution. It is difficult for a single local authority in isolation to completely bring about this change as it is a matter requiring intervention from national Governments.

6. The Infrastructure Delivery Plan is a compendium of projected infrastructure provision and it helps to ensure that this infrastructure is provided in a timely manner and in a coordinated and sustainable way. It sets out the infrastructure that will support the level of development that is proposed in the Calderdale Local Plan.

7. The 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.

8. The site specific requirements developers must comply with, together with the policies in the Plan, should preclude development in inappropriate locations or adversely affecting the environment as

mitigation measures are required.

9. The overall HRF is only marginally below the higher figure in the Turley report due to use of the baseline economic scenario towards the end of the Plan period, reflecting the difficulties of accurately forecasting economic growth this far into the future. As the plan will be reviewed every 5 years any new evidence will inform these reviews. Through the examination process the Council is exploring the use of a stepped housing trajectory with the first part of the Plan period being lower given that notwithstanding supply a higher figure will not be delivered. Current calculations of supply demonstrate a buffer whilst assumptions around the delivery of extant planning permissions and windfalls have been conservative.

10. See 3) above
The Turley report (see CC21 – Modelling the economic implications of the proposed housing requirement Turley, 2019) provides the rationale behind the housing requirement figure. Whilst additional allocations will have impacts, site specific requirements for developments, together with infrastructure improvements and additions, should mitigate these.

11.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).

12. The Council considers that the assessments undertaken are consistent with Regional, sub regional and local growth strategies. The Regional Econometric Model is updated on a regular basis and any changes in forecasts will be monitored and taken into account when reviewing the Plan.

13. The Council is committed to supporting future employment growth in the Borough both to meet the job needs of residents and to grow the local economy. Clearly, in a region such as West Yorkshire people travel to work places beyond district boundaries but the provision of good quality jobs and housing should help to attract people to the district thereby reducing out commuting and preventing Calderdale simply becoming a dormitory district.

14. The Turley report was undertaken by consultants specialising in this area of work in order to further examine the relationship between economic growth and housing. Inevitably in this type of work assumptions have to be made about the future. Economic strategies will be monitored and reviewed and incorporated into the review of the Local Plan. Good quality jobs and housing should help to attract people to the district thereby reducing out commuting and preventing Calderdale simply becoming a dormitory district.

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

16. The overall HRF is only marginally below the policy on with transport scenario figure in the Turley report

due to use of the baseline economic scenario towards the end of the Plan period, reflecting the difficulties of accurately forecasting economic growth this far into the future. As the plan will be reviewed every 5 years any new evidence will inform these reviews. Through the examination process the Council is exploring the use of a stepped housing trajectory with the first part of the Plan period being lower given that notwithstanding supply a higher figure will not be delivered.

Duty to Co-operate

Main Issues:

1. Lack of cooperation between Calderdale and neighbouring authorities.

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.

Suggested Modifications

1. The housing requirement figure should be reduced.

2. Reassess the economic forecasts

3. The Council should revisit the population and job projections in order to build a solid base for the housing requirement.

4. The 1,040 dpa figure should be applied for the full plan period.

Council's Response:

1. For the reasons set out in CC39 (Housing Requirement Update and Potential Supply) and CC21 Modelling the economic implications of the proposed housing requirement) the Council does not consider it appropriate to reduce the revised housing requirement figure.

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

3. The Council has already re-visited the demographic and employment data through the Turley report in order to arrive at the revised housing requirement. No further work is considered necessary at this point in the plan making process but will be considered on the mandatory Plan review.

4. Given that the proposed HRF represents a significant increase on previous plans, including the Publication Draft Local Pan, the requirement to review every 5 years and the fact that increasing supply will not lead to a significant increase in delivery no further modification is proposed

Document Section: 4.2 Paragraph

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:

Document Section: Table 2 Housing requirement and sources of supply

Representations

Comment ID **HRU1780** Site ref (if applicable):

Person ID: **11797** Name: **Mr & Mrs Mark & Amanda Tattersall** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Please see attachment for comments

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

Duty to Co-operate Reason:

Suggested Modifications:

A full assessment of Calderdale as a whole, its settlements, constraints and capacity. The IES to be quantified and made a Spatial Document and then taken into account for the economic ambition and before any further Green Belt is released above that needed for the Government Standard Method. The jobs growth figure of 8,295 (FTE) to be revisited

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5634335

Comment ID **HRU1975** Site ref (if applicable):

Person ID: **1094576** Name: **Mr Brian Reynolds** Organisation: **Gleeson Homes Ltd**

Agent ID: **1104252** Name: **Mr Mark Eagland** Organisation: **Peacock & Smith**

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

Legal Compliance Reason:

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

Sound Reason:

Gleeson Regeneration notes that the updated housing requirement for the Local Plan is 14,950 dwellings and that taking into account extant planning permissions and windfalls, 11,768 dwellings will need to be allocated for housing to meet this requirement. The Housing Requirement Update paper confirms that taking into account of the additional mixed-use and housing allocations proposed within the consultation, the total capacity of allocations within the Local Plan will be 11,882 i.e. a surplus of 114 dwellings. In our view this level of buffer is insufficient. The housing supply is not positively prepared, justified or effective and therefore it is unsound. A surplus of 114 dwellings represents flexibility of just 0.76% over the total Plan requirement. This is an extremely low suplus given that the Borough has a poor track record of housing delivery, as evidenced by the recent Housing Delivery Test results, which show that over the past three years there was a shortage of 1,280 homes delivered against the requirement over this period. There is very little contingency in the event that sites within the housing supply encounter unforeseen constraints. This could quite easily occur given that many housing sites in Calderdale have challenging topography, which could impact on the housing capacity of sites at detailed planning stage and/or the viability of development schemes. The Housing Requirement Update paper also shows that most of the proposed new allocations have additional constraints that will need to be overcome. These include flood risk, proximity to designated habitat sites, potential land contamination, proximity to heritage assets and highways issues. By way of example, we note that 23% of the 1,996 additional dwelling capacity proposed in the Housing Requirement Update consultation relates to a single allocation at Exley Lane, Elland (LP1567 ; 450 dwellings). The Site Assessment Report for this allocation indicates that the following issues arise with development of this site: ï‚· Flooding issues due to sloping topography. Detailed hydrological assessment required; ï‚· Impact on the local road network requiring mitigation; ï‚· Buffer with Elland Park Wood and Local Wildlife site required; ï‚· Unclear how much of the area to the south of Exley Hall should remain undeveloped in order to safeguard the setting of the Listed Building; and ï‚· Site will need a stand off from an industrial use to the north, due to noise generation from green chipping process. Having regard to the above, these issues cast doubt as to whether LP1567 is able to deliver 450 dwellings as claimed by the Housing Requirement Update consultation. Whilst we recognise that the Council's Site Assessment Reports state that most issues can be mitigated, they highlight the risk of pursuing a strategy where there is very little flexibility in the housing supply. Until detailed proposals are worked up at planning application stage there is uncertainty as to whether the housing figure assumed for allocations with such constraints can be delivered given the high-level nature of information provided as part of the Local Plan process. In the event that a single large site such as LP1567 and/or several smaller sites experience difficulties in achieving the stated capacities, then the identified housing needs of the Borough may not be met. In our view the Local Plan should therefore have a greater buffer of housing supply (5 to 10%) to ensure that identified development needs are met. The housing requirement is a 'minimum' requirement and therefore such a buffer would accord Government objectives to significantly boost the supply of housing (Para 59 of the NPPF). Gleeson has proposed Land at Hays Lane, Halifax (LP1626) for housing (indicative site layout plan attaced), essentially as an extension to the Phase 1 Gleeson scheme at Hays Lane which is under construction. As a second phase of the latter development Site LP1626 is an obvious choice to provide for additional flexibility in the housing supply, given that necessary services and infrastructure have already been provided as part of Phase 1. This site is level, has no significant physical constraints and the success of the Phase 1 Gleeson schjeme shows that it is a location that it is likely to be in demand. Indeed, at Issues and Options stage LP1626 was proposed as a housing allocation by the Council ; presumably because Officers considered that the site had strong merits for residential development. LP1626 is also located in the Halifax sub area of the Borough, the top tier of the settlement hierarchy. Whilst LP1626 was subsequently filtered out by the Council, we consider that the site would cause no more harm to the Green Belt than the other new housing sites that the Council is proposing as part ofthe Housing Requirement Update consultation, nor is it more constrained in respect of potential showstopping issues once mitigation is taken into account. The Site Assessment Report refers to potential impacts on the South Pennine Moors SSSI/SAC/SPA and the lack of a Habitats Regulations Assessment (HRA), but Gleeson instructed SLR Consulting to prepare an ecological impact assessment together with a HRA in order to

address the ecological constraints referred to in the site assessment report, and this has been provided to the Council. The impact assessment and HRA prepared by SLR demonstrate that: ï,· The site is 1.7km from the SPA, SSSI and SAC. Given this distance there is very unlikely to be any linked functionality between the site and these protected areas. ï,· The curlew records provided by WYES are very likely to be nesting outside of the SPA and do not form part of the SPA assemblage. Any impact upon on them (if an impact were to arise) would not affect the integrity of the SPA per se. ï,· The site is sub optimal as a feeding/nesting resource for wading birds and consequently any direct impact on wading birds on or near the site would be minor, at worst. ï,· There is unlikely to be significant additional recreational impacts on the SPA, SSSI and SAC as a result of a residential development of site LP1626. ï,· The site does not have appreciable potential to support breeding or feeding waders. ï,· There would be a minor positive impact on woodland in the east of the site that forms part of the Calderdale Wildlife Habitat Network. Given the above, Gleeson disagrees with the Site Assessment Report conclusion that ecology is a showstopper constraint that prevents allocation of LP1626 for housing.

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

Duty to Co-operate Reason:

Suggested Modifications:

The Local Plan should have a greater buffer of housing supply (5 to 10%) to ensure that identified development needs are met. Land at Hays Lane, Halifax (LP1626) should be allocated for housing to help provide such additional flexibility.

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5632465 ; http://calderdale-consult.objective.co.uk/file/5632464

Comment ID **HRU1978** Site ref (if applicable):

Person ID: **1246540** Name: **Countryside Properties** Organisation: **Countryside Properties**

Agent ID: **691692** Name: **Ms Lucie Jowett** Organisation: **Senior Planner Barton Willmore**

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

Legal Compliance Reason:

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

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION Summary The following sources of supply are identified by the Council to provide for 15,064 dwellings over the plan period: "¢ Extant planning permissions: 1,888 "¢ Windfalls: 1,294 "¢ Allocations: 11,882. This equates to only 114 additional dwellings over the Council's proposed requirement of 14,950 dwellings over the plan period, i.e. a buffer of less than 1%. This does not take account of any under-delivery or sites not coming forward which is an unsound approach and we note that this requirement is also too low to achieve the Council's economic growth aspirations. The 11,882 allocations identified by the Council is made up of: "¢ 9,460 dwellings on allocations previously identified in

the Publication Draft Plan ; this should however be revised to 8,767 dwellings to take account of the revised delivery rates presented within the Statement of Common Ground on Thornhills Garden Suburb. "¢ 1,996 dwellings on additional allocations proposed. "¢ 426 dwellings as a result of revised densities on previous allocations. The revised densities on previous allocations has not been justified and there is no evidence to support these. We strongly object to this approach. In order for the Plan to deliver its housing requirement further Green Belt release is needed. At least a further 1,676 dwellings need to be allocated on Green Belt release sites to meet the requirement of 15,600 dwellings as a minimum. This does not take account of any under delivery and so either safeguarded land or a buffer will need to be applied.

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

Duty to Co-operate Reason:

Suggested Modifications:

At least a further 1,676 dwellings need to be allocated on Green Belt release sites to meet the requirement of 15,600 dwellings as a minimum. This does not take account of any under delivery and so either safeguarded land or a buffer will need to be applied.

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5632466

Comment ID **HRU1989** Site ref (if applicable):

Person ID: **855708** Name: **Barratt Homes & David Wilson Homes** Organisation: **Barratt Homes & David Wilson Homes**

Agent ID: **691692** Name: **Ms Lucie Jowett** Organisation: **Senior Planner Barton Willmore**

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

Legal Compliance Reason:

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

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION Following the revised housing requirement, the Council has been required to identify additional sources of supply. These are assessed in detail within the representations on behalf of the consortium of housebuilders, appended to these representations. 3.2 In summary, the following sources of supply are identified by the Council to provide for 15,064 dwellings over the plan period: "¢ Extant planning permissions: 1,888 "¢ Windfalls: 1,294 "¢ Allocations: 11,882. This equates to only 114 additional dwellings over the Council's proposed requirement of 14,950 dwellings over the plan period, i.e. a buffer of less than 1%. This does not take account of any under-delivery or sites not coming forward which is an unsound approach and we note that this requirement is also too low to achieve the Council's economic growth aspirations. The 11,882 allocations identified by the Council is made up of: "¢ 9,460 dwellings on allocations previously identified in the Publication Draft Plan ; this should however be revised to 8,767 dwellings to take account of the revised delivery rates presented within the Statement of Common Ground on Thornhills Garden Suburb. "¢ 1,996 dwellings on additional

allocations proposed. "¢ 426 dwellings as a result of revised densities on previous allocations. The revised densities on previous allocations has not been justified and there is no evidence to support these. We strongly object to this approach. In order for the Plan to deliver its housing requirement further Green Belt release is needed. At least a further 1,676 dwellings need to be allocated on Green Belt release sites to meet the requirement of 15,600 dwellings as a minimum. This does not take account of any under delivery and so either safeguarded land or a buffer will need to be applied. Our Client's sites are all suitable and available and can help to meet this need. Our Client's sites which are not currently proposed to be allocated could help to deliver a further 615 homes towards this additional requirement. 446 of these were previously allocated within the Local Plan Initial Draft and so considered suitable for housing development by the Council. The sites are all assessed in further detail within the remainder of these representations.

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

Duty to Co-operate Reason:

Suggested Modifications:

SEE ATTACHED FOR FULL REPRESENTATION At least a further 1,676 dwellings need to be allocated on Green Belt release sites to meet the requirement of 15,600 dwellings as a minimum. This does not take account of any under delivery and so either safeguarded land or a buffer will need to be applied.

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5632467

Comment ID **HRU1998** Site ref (if applicable):

Person ID: **960869** Name: **Stonebridge Homes** Organisation:

Agent ID: **691692** Name: **Ms Lucie Jowett** Organisation: **Senior Planner Barton Willmore**

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

Legal Compliance Reason:

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

Sound Reason:

PLEASE SEE ATTACHED FOR FULL REPRESENTATION Following the revised housing requirement, the Council has been required to identify additional sources of supply. These are assessed in detail within the representations on behalf of the consortium of housebuilders, appended to these representations. In summary, the following sources of supply are identified by the Council to provide for 15,064 dwellings over the plan period: "¢ Extant planning permissions: 1,888 "¢ Windfalls: 1,294 "¢ Allocations: 11,882. This equates to only 114 additional dwellings over the Council's proposed requirement of 14,950 dwellings over the plan period, i.e. a buffer of less than 1%. This does not take account of any under-delivery or sites not coming forward which is an unsound approach and we note that this requirement is also too low to achieve the Council's economic growth aspirations. The 11,882 allocations identified by the Council is made up of: "¢ 9,460 dwellings on allocations previously identified in the Publication Draft Plan ; this

should however be revised to 8,767 dwellings to take account of the revised delivery rates presented within the Statement of Common Ground on Thornhills Garden Suburb. "¢ 1,996 dwellings on additional allocations proposed. "¢ 426 dwellings as a result of revised densities on previous allocations. The revised densities on previous allocations has not been justified and there is no evidence to support these. We strongly object to this approach. In order for the Plan to deliver its housing requirement further Green Belt release is needed. At least a further 1,676 dwellings need to be allocated on Green Belt release sites to meet the requirement of 15,600 dwellings as a minimum. This does not take account of any under delivery and so either safeguarded land or a buffer will need to be applied. Our Client's site is suitable and available and can help to meet this need by providing 76 dwellings within the Plan Period. The site is assessed in further detail within the remainder of these representations.

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

Duty to Co-operate Reason:

Suggested Modifications:

PLEASE SEE ATTACHED FOR FULL REPRESENTATION At least a further 1,676 dwellings need to be allocated on Green Belt release sites to meet the requirement of 15,600 dwellings as a minimum. This does not take account of any under delivery and so either safeguarded land or a buffer will need to be applied.

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5632468

Comment ID **HRU2010** 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 REPRESENTAION The Council's decision to support the 'policy on' employment scenario modelled by Turley but then only apply this to the first 10 years of the plan period is unjustified and not consistent with national policy. Furthermore it is clear that there is not an absence of suitable sites to deliver the housing requirement identified in the Turley report. Indeed, as these representations demonstrate, Persimmon is in control of currently rejected sites which are in sustainable locations, technically developable, and capable of delivering approximately 190 homes. To be found Sound, the emerging Local Plan must be based on a minimum housing requirement of 1,040 dpa (15,600 for the plan period).

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

Duty to Co-operate Reason:

Suggested Modifications:

To be found Sound, the emerging Local Plan must be based on a minimum housing requirement of 1,040 dpa (15,600 for the plan period).

Comments:

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

Comment ID **HRU2022** Site ref (if applicable):

Person ID: **961958** Name: **Crosslee plc** Organisation: **Crosslee plc**

Agent ID: **1104252** Name: **Mr Mark Eagland** Organisation: **Peacock & Smith**

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

Legal Compliance Reason:

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

Sound Reason:

Crosslee notes that the updated housing requirement for the Local Plan is 14,950 dwellings and that taking into account extant planning permissions and windfalls, 11,768 dwellings will need to be allocated for housing to meet this requirement. The Housing Requirement Update paper confirms that taking into account of the additional mixed-use and housing allocations proposed within the consultation, the total capacity of allocations within the Local Plan will be 11,882 i.e. a surplus of 114 dwellings. In our view this level of buffer is insufficient. The housing supply is not positively prepared, justified or effective and therefore it is unsound. A surplus of 114 dwellings represents flexibility of just 0.76% over the total Plan requirement. This is an extremely low suplus given that the Borough has a poor track record of housing delivery, as evidenced by the recent Housing Delivery Test results, which show that over the past three years there was a shortage of 1,280 homes delivered against the requirement over this period. There is very little contingency in the event that sites within the housing supply encounter unforeseen constraints. This could quite easily occur given that many housing sites in Calderdale have challenging topography. The Housing Requirement Update paper also shows that most of the proposed new allocations have additional constraints that will need to be overcome. These include flood risk, proximity to designated habitat sites, potential land contamination, proximity to heritage assets and highways issues. Until detailed proposals are worked up at planning application stage there is uncertainty as to whether the housing figure assumed for allocations with such constraints can be delivered. In our view the Local Plan should have a greater buffer of housing supply (5 to 10%) to ensure that identified development needs are met. The housing requirement is a 'minimum' requirement and therefore such a buffer would accord Government objectives to significantly boost the supply of housing (Para 59 of the NPPF). Land at Crosslee, Hipperholme is available to assist the provision of a greater buffer of supply. In our client's associated comments on Table 3 of the Housing Requirement Update paper we confirm that Crosslee and the Council seek allocation of this land for mixed use. Changes Required to Make Housing Requirement Figure Sound The Local Plan should have a greater buffer of housing supply (5 to 10%) to ensure that identified development needs are met.

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

Duty to Co-operate Reason:

Suggested Modifications:

Changes Required to Make Housing Requirement Figure Sound The Local Plan should have a greater buffer of housing supply (5 to 10%) to ensure that identified development needs are met.

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5632968

Comment ID **HRU2024** Site ref (if applicable):

Person ID: **855708** Name: **Barratt Homes & David Wilson Homes** Organisation: **Barratt Homes & David Wilson Homes**

Agent ID: **691692** Name: **Ms Lucie Jowett** Organisation: **Senior Planner Barton Willmore**

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

Legal Compliance Reason:

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

Sound Reason:

These representations are submitted on behalf of a consortium of housebuilders. The housebuilders for whom these representations are made on behalf of are Barratt and David Wilson Homes (Yorkshire) Limited, Avant Homes, Alcuin Homes, Stonebridge Homes and Persimmon Homes (West Yorkshire). PLEASE SEE ATTACHED FOR FULL REPRESENTATION A lapse rate to extant planning permissions and a buffer for under delivery of housing allocations should be applied. In addition to a buffer being required, we are concerned that there is a significant amount of windfall allowance. [with regards to Thornhills Garden Suburb] Delivery rates within the SoCG are overestimated and certainly the Council's assumption that the Garden Suburb will be able to deliver an additional 600 dwellings within the plan period is wholly unrealistic and unjustified. Brownfield sites within and close to town centres currently discounted on flooding grounds are now assumed that they will come forward over the plan period as a result of investment. The consortium object to the inclusion of additional supply which has not been considered as available or deliverable by the Council previously. The inclusion of this is unjustified and effectively undermines the Council's evidence base. The consortium object to the revised assumptions around residential density. Employment allocation LP1622 at Mytholmroyd has been revised to a mixed-use live/work development. No evidence has been submitted to demonstrate why this allocation has been revised and the implications on housing or employment numbers.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5633062

Comment ID **HRU2026** Site ref (if applicable):

Person ID: **1185901** Name: **Avant Homes** Organisation:

Agent ID: **691692** Name: **Ms Lucie Jowett** Organisation: **Senior Planner Barton Willmore**

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

Legal Compliance Reason:

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

Sound Reason:

These representations are submitted on behalf of a consortium of housebuilders. The housebuilders for whom these representations are made on behalf of are Barratt and David Wilson Homes (Yorkshire) Limited, Avant Homes, Alcuin Homes, Stonebridge Homes and Persimmon Homes (West Yorkshire). PLEASE SEE ATTACHED FOR FULL REPRESENTATION A lapse rate to extant planning permissions and a buffer for under delivery of housing allocations should be applied. In addition to a buffer being required, we are concerned that there is a significant amount of windfall allowance. [with regards to Thornhills Garden Suburb] Delivery rates within the SoCG are overestimated and certainly the Council's assumption that the Garden Suburb will be able to deliver an additional 600 dwellings within the plan period is wholly unrealistic and unjustified. Brownfield sites within and close to town centres currently discounted on flooding grounds are now assumed that they will come forward over the plan period as a result of investment. The consortium object to the inclusion of additional supply which has not been considered as available or deliverable by the Council previously. The inclusion of this is unjustified and effectively undermines the Council's evidence base. The consortium object to the revised assumptions around residential density. Employment allocation LP1622 at Mytholmroyd has been revised to a mixed-use live/work development. No evidence has been submitted to demonstrate why this allocation has been revised and the implications on housing or employment numbers.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5633062

Comment ID **HRU2028** Site ref (if applicable):

Person ID: **961885** Name: **Alcuin Homes** Organisation:

Agent ID: **691692** Name: **Ms Lucie Jowett** Organisation: **Senior Planner Barton Willmore**

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

Legal Compliance Reason:

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

Sound Reason:

These representations are submitted on behalf of a consortium of housebuilders. The housebuilders for whom these representations are made on behalf of are Barratt and David Wilson Homes (Yorkshire) Limited, Avant Homes, Alcuin Homes, Stonebridge Homes and Persimmon Homes (West Yorkshire). PLEASE SEE ATTACHED FOR FULL REPRESENTATION A lapse rate to extant planning permissions and a buffer for under delivery of housing allocations should be applied. In addition to a buffer being required, we are concerned that there is a significant amount of windfall allowance. [with regards to Thornhills Garden Suburb] Delivery rates within the SoCG are overestimated and certainly the Council's assumption that the Garden Suburb will be able to deliver an additional 600 dwellings within the plan period is wholly unrealistic and unjustified. Brownfield sites within and close to town centres currently discounted on flooding grounds are now assumed that they will come forward over the plan period as a result of investment. The consortium object to the inclusion of additional supply which has not been considered as available or deliverable by the Council previously. The inclusion of this is unjustified and effectively undermines the Council's evidence base. The consortium object to the revised assumptions around residential density. Employment allocation LP1622 at Mytholmroyd has been revised to a mixed-use live/work development. No evidence has been submitted to demonstrate why this allocation has been revised and the implications on housing or employment numbers.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5633062

Comment ID **HRU2030** Site ref (if applicable):

Person ID: **960869** Name: **Stonebridge Homes** Organisation:

Agent ID: **691692** Name: **Ms Lucie Jowett** Organisation: **Senior Planner Barton Willmore**

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

Legal Compliance Reason:

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

Sound Reason:

These representations are submitted on behalf of a consortium of housebuilders. The housebuilders for whom these representations are made on behalf of are Barratt and David Wilson Homes (Yorkshire) Limited, Avant Homes, Alcuin Homes, Stonebridge Homes and Persimmon Homes (West Yorkshire). PLEASE SEE ATTACHED FOR FULL REPRESENTATION A lapse rate to extant planning permissions and a buffer for under delivery of housing allocations should be applied. In addition to a buffer being required, we are concerned that there is a significant amount of windfall allowance. [with regards to Thornhills Garden Suburb] Delivery rates within the SoCG are overestimated and certainly the Council's assumption that the Garden Suburb will be able to deliver an additional 600 dwellings within the plan period is wholly unrealistic and unjustified. Brownfield sites within and close to town centres currently discounted on flooding grounds are now assumed that they will come forward over the plan period as a result of investment. The consortium object to the inclusion of additional supply which has not been considered as available or deliverable by the Council previously. The inclusion of this is unjustified and effectively undermines the Council's evidence base. The consortium object to the revised assumptions around residential density. Employment allocation LP1622 at Mytholmroyd has been revised to a mixed-use live/work development. No evidence has been submitted to demonstrate why this allocation has been revised and the implications on housing or employment numbers.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5633062

Comment ID **HRU2032** Site ref (if applicable):

Person ID: **1185995** Name: **Persimmon Homes (West Yorkshire)** Organisation:

Agent ID: **691692** Name: **Ms Lucie Jowett** Organisation: **Senior Planner Barton Willmore**

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

Legal Compliance Reason:

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

Sound Reason:

These representations are submitted on behalf of a consortium of housebuilders. The housebuilders for whom these representations are made on behalf of are Barratt and David Wilson Homes (Yorkshire) Limited, Avant Homes, Alcuin Homes, Stonebridge Homes and Persimmon Homes (West Yorkshire). PLEASE SEE ATTACHED FOR FULL REPRESENTATION A lapse rate to extant planning permissions and a buffer for

under delivery of housing allocations should be applied. In addition to a buffer being required, we are concerned that there is a significant amount of windfall allowance. [with regards to Thornhills Garden Suburb] Delivery rates within the SoCG are overestimated and certainly the Council's assumption that the Garden Suburb will be able to deliver an additional 600 dwellings within the plan period is wholly unrealistic and unjustified. Brownfield sites within and close to town centres currently discounted on flooding grounds are now assumed that they will come forward over the plan period as a result of investment. The consortium object to the inclusion of additional supply which has not been considered as available or deliverable by the Council previously. The inclusion of this is unjustified and effectively undermines the Council's evidence base. The consortium object to the revised assumptions around residential density. Employment allocation LP1622 at Mytholmroyd has been revised to a mixed-use live/work development. No evidence has been submitted to demonstrate why this allocation has been revised and the implications on housing or employment numbers.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5633062

Comment ID **HRU2043** Site ref (if applicable):

Person ID: **1246643** Name: **Martin Walsh Associates** Organisation:

Agent ID: **1182209** Name: **Miss Rachel Flounders** Organisation: **ID Planning**

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION Table 2 sets out the housing requirement figure and sources of supply and also provides a comparison between the publication draft figures and the new revised figures. Table 2 identifies that 11,768 dwellings are needed on new land allocations, compared to 9,418 dwellings in the publication draft. The final part of Table 2 identifies a total supply (extant permissions, windfalls and allocations) of 15,064 dwellings. The additional new housing sites identified in the consultation paper will therefore ensure there are sufficient sites to deliver the housing requirement of 14,950 dwellings. We support the identification of additional housing allocations to meet the identified need. As the proposed supply is only 114 dwellings above the requirement figure the Council is therefore reliant on all of the identified housing allocations coming forward as expected. As part our representation we have therefore provided additional supporting evidence in respect of adjoining proposed allocations LP0782 and LP1543 to demonstrate the sites are available, suitable and deliverable.

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/5633572

Comment ID **HRU2045** Site ref (if applicable):

Person ID: **1140304** Name: **Joanne Harding** Organisation: **Local Plans Manager - North Home Builders Federation**

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 Table 2 suggests that there are: 1,888 extant planning permissions; 1,294 windfalls 11,882 allocations (an increase of 2,422 dwellings from the Publication version) This suggests there is a land supply for a potential 15,064 homes, this is 114 more homes than the housing requirement of 14,950. Extant planning permissions 1,888 dwellings have been included within the supply from extant permissions not including outline permissions. The HBF are supportive of the use of a 10% discount for sites with planning permission of less than 10 units and the recognition that some permissions will lapse or not be renewed. For proposals of 10 or more dwellings officers have made a judgement using available intelligence to ascertain the likeliness of the scheme coming forward. Whilst the HBF support the Council in making these judgements, it still may be beneficial to include a level of discount to ensure that unforeseen events are also taken into consideration. Windfalls 1,294 dwellings have been included within the supply from windfalls. Whilst the HBF acknowledges the previously the Council has had a healthy level of development from windfall sites, it is considered that this level of delivery will reduce over future years as the sites allocated in the Local Plan and identified in the SHLAA come forward. The HBF are supportive of not including an allowance for windfalls in the first three years of the Plan. Allocations As previously, the number of proposed allocations do not allow for flexibility in the supply, or for slippage in the delivery of sites. It would only require a small proportion of the sites not to come forward or for the windfalls to drop off slightly, for the housing requirement to not be met. Whilst the HBF do not wish to comment upon the acceptability or otherwise of individual proposed allocations. The HBF would recommend that a greater number of sites are allocated to provide a buffer over and above those required to meet the plan requirement. The reason for the application of a buffer of sites is two-fold. Firstly, the plan housing requirement should be identified as a minimum to conform to the NPPF requirements to boost supply and plan positively. It therefore stands to reason that the plan should seek to surpass this requirement. Secondly, a buffer will provide a balance against the inevitable under or non-delivery from some existing commitments or proposed allocations.

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/5633159

Comment ID **HRU2102** Site ref (if applicable):

Person ID: **1182211** Name: Organisation: **Thornhill Estates**

Agent ID: **1182209** Name: **Miss Rachel Flounders** Organisation: **ID Planning**

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION Table 2 sets out the housing requirement figure and sources of supply and also provides a comparison between the publication draft figures and the new revised figures. Table 2 identifies that 11,768 dwellings are needed on new land allocations, compared to 9,418 dwellings in the publication draft. The final part of Table 2 identifies a total supply (extant permissions, windfalls and allocations) of 15,064 dwellings. The additional new housing sites identified in the consultation paper will therefore ensure there are sufficient sites to deliver the housing requirement of 14,950 dwellings. As the supply is only 114 dwellings above the requirement and therefore the Council is reliant on all the identified sites coming forward as expected. Thornhill Estates have provided supporting evidence throughout the Local Plan consultation process to demonstrate the deliverability of their sites which are proposed for allocation.

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/5633670

Comment ID **HRU2170** Site ref (if applicable):

Person ID: **1129942** Name: **Norah Smith** Organisation:

Agent ID: **1246896** Name: **Gen Kenington** Organisation: **Associate Director Johnson**

Mowat Planning Ltd

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION Table 2 'Housing requirement and sources of supply' shows an oversupply of just 114 dwellings, against the requirement of 14,950. This equates to just 0.76% of the housing requirement. This does not provide a sufficient buffer or flexibility to draw from sites, should allocated sites and windfall sites not deliver as anticipated. This is contrary to the Framework, which requires Local Plans to have -“sufficient flexibility to adapt to rapid change"(Paragraph 14). The provision of an additional supply of 114 dwellings does not equate to 'sufficient flexibility' and it would only take the non-delivery of a limited number of sites for the Local Plan to fall short of its supply. There is little margin for error, which is a further reason for the need to identify additional land for housing. A buffer of sites is required to account for the housing requirement being a minimum as well as providing a buffer to account for under or non-delivery of existing permissions and proposed allocations. The insufficient flexibility in supply is notwithstanding our comments that the housing requirement to reflect the 'policy on plus transport' growth scenario should apply for the duration of the plan period. Therefore additional sites are required to provide a sufficient buffer and flexibility, on top of the need to identify additional sites to meet our recommended increased housing requirement to 15,600. The Inspector's Report into the Harrogate Local Plan Examination has been recently published, whereby the Inspector comments on Harrogate Council's 25% over-allocation against the housing requirement, stating that whilst the over-allocation is generous the Framework does not prevent local planning authorities from allocating more sites than are needed to meet the housing requirement. Paragraph 180 of the Harrogate Inspector's Report states that -“Some built-in flexibility -“to adapt to rapid change"particularly where the plan features some large allocations, is sensible."The Calderdale Local Plan, like Harrogate, includes some large allocations, indeed Calderdale Local Plan is reliant on two garden suburbs, therefore the recent Inspector's comments from Harrogate Local Plan are considered relevant and noteworthy in respect of the Calderdale Local Plan. To conclude, the housing supply identified by the Council is not sufficient and is unsound, failing the 'positively prepared', 'justified' and 'effective' soundness tests. More flexibility is required and additional sites should be identified.

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

Duty to Co-operate Reason:

Suggested Modifications:

Increase housing requirement to minimum of 15,600 Identify additional housing sites Identify LP1472 as a Housing Allocation

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5634580

Comment ID **HRU2325**

Site ref (if applicable):

Person ID: **954577** Name: **Mr M Bretton** Organisation:

Agent ID: **229408** Name: **Mr Jonathan Dunbavin** Organisation: **Associate I D Planning**

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION Table 2 sets out the housing requirement figure and sources of supply and also provides a comparison between the publication draft figures and the new revised figures. Table 2 identifies that 11,768 dwellings are needed on new land allocations, compared to 9,418 dwellings in the publication draft. The final part of Table 2 identifies a total supply (extant permissions, windfalls and allocations) of 15,064 dwellings. The additional new housing sites identified in the consultation paper will therefore ensure there are sufficient sites to deliver the housing requirement of 14,950 dwellings. As the supply is only 114 dwellings above the requirement and therefore the Council is reliant on all the identified sites coming forward as expected. The owners of site LP1463 (the Bretton family, Hartley family, Mrs Caine and Harron Homes) have provided supporting evidence throughout the Local Plan consultation process to demonstrate the deliverability of the garden suburb site LP1463 which is proposed for allocation.

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/5636962

Comment ID **HRU2327** Site ref (if applicable):

Person ID: **1119222** Name: **Ms Jean Caine** Organisation:

Agent ID: **229408** Name: **Mr Jonathan Dunbavin** Organisation: **Associate I D Planning**

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION Table 2 sets out the housing requirement figure and sources of supply and also provides a comparison between the publication draft figures and the new revised figures. Table 2 identifies that 11,768 dwellings are needed on new land allocations, compared to 9,418 dwellings

in the publication draft. The final part of Table 2 identifies a total supply (extant permissions, windfalls and allocations) of 15,064 dwellings. The additional new housing sites identified in the consultation paper will therefore ensure there are sufficient sites to deliver the housing requirement of 14,950 dwellings. As the supply is only 114 dwellings above the requirement and therefore the Council is reliant on all the identified sites coming forward as expected. The owners of site LP1463 (the Bretton family, Hartley family, Mrs Caine and Harron Homes) have provided supporting evidence throughout the Local Plan consultation process to demonstrate the deliverability of the garden suburb site LP1463 which is proposed for allocation.

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/5636962

Comment ID **HRU2329** Site ref (if applicable):

Person ID: **11779** Name: **Mr Mark Beevers** Organisation: **Harron Homes Ltd**

Agent ID: **229408** Name: **Mr Jonathan Dunbavin** Organisation: **Associate I D Planning**

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION Table 2 sets out the housing requirement figure and sources of supply and also provides a comparison between the publication draft figures and the new revised figures. Table 2 identifies that 11,768 dwellings are needed on new land allocations, compared to 9,418 dwellings in the publication draft. The final part of Table 2 identifies a total supply (extant permissions, windfalls and allocations) of 15,064 dwellings. The additional new housing sites identified in the consultation paper will therefore ensure there are sufficient sites to deliver the housing requirement of 14,950 dwellings. As the supply is only 114 dwellings above the requirement and therefore the Council is reliant on all the identified sites coming forward as expected. The owners of site LP1463 (the Bretton family, Hartley family, Mrs Caine and Harron Homes) have provided supporting evidence throughout the Local Plan consultation process to demonstrate the deliverability of the garden suburb site LP1463 which is proposed for allocation.

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/5636962

Comment ID **HRU2331** Site ref (if applicable):

Person ID: **1062367** Name: **Mr Peter Hartley** Organisation:

Agent ID: **229408** Name: **Mr Jonathan Dunbavin** Organisation: **Associate I D Planning**

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION Table 2 sets out the housing requirement figure and sources of supply and also provides a comparison between the publication draft figures and the new revised figures. Table 2 identifies that 11,768 dwellings are needed on new land allocations, compared to 9,418 dwellings in the publication draft. The final part of Table 2 identifies a total supply (extant permissions, windfalls and allocations) of 15,064 dwellings. The additional new housing sites identified in the consultation paper will therefore ensure there are sufficient sites to deliver the housing requirement of 14,950 dwellings. As the supply is only 114 dwellings above the requirement and therefore the Council is reliant on all the identified sites coming forward as expected. The owners of site LP1463 (the Bretton family, Hartley family, Mrs Caine and Harron Homes) have provided supporting evidence throughout the Local Plan consultation process to demonstrate the deliverability of the garden suburb site LP1463 which is proposed for allocation.

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/5636962

Comment ID **HRU63** Site ref (if applicable):

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

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

1.Comments on Revised Housing Requirement Figure and Potential Suppl y- Proposed Change to Housing Requirement The Council failed to consider all developable and sustainable brownfield sites suitable for housing first, in its submitted plan, which it should have, according to national planning policy. The introduction of new brownfield sites (together with additional greenfield sites) in its proposed changes, demonstrates this failure. The approach used places little confidence in the Council's case that planned release of additional Green Belt land as a change to the submitted plan to meet its housing requirement is based on the existence of exceptional circumstances. The plan is therefore unsound as the exception is not fully evident. The Council claims its focus is on regeneration of brownfield sites. The Council should therefore change its methodology in how it arrives at making up its housing requirement e.g. lowering the size threshold of potential housing sites for inclusion in the Local Plan, thus allowing available small sites in sustainable locations to be included as part of the policy plan base, as opposed to assumptions on windfall contributions. Furthering this approach would reduce the need and extent for additional Green Belt land release for housing. A compendium of such small sites, extracted from the Council's SHLA base could formally be identified on a policy map in tandem with the principle map base. Identifying such small sites as contributing to housing provision is a known technique used by other authorities. It would further better satisfy Sustainablity Appraisal Objective 13, in terms of the efficient use of land. Based on the current methodology applied the plan is unsound. 2.Comments on the Proposed Potential Modification of the Local Plan Introducing a Revised Housing Requirement Figure and Potential Supply with Additional Housing Site Allocatrions The fact that Green Belt boundaries are having to be substantially revised as a proposed change to the submitted draft plan to accommodate further additional housing provision/ new housing allocations, demonstrates that the Green Belt boundaries/planned settlement boundaries in the draft plan are too tightly drawn. This potentially undermines the principle of permanence of Green Belt as well as undermines spatial future development options in a plan review. The Council accepts there is uncertainty in its assessment of housing supply towards the end of its housing forecast. Flexibility as I advocate would give direction and greater certainty, making the plan more robust. Opportunity now exists to rectify and strengthen the draft plan or at modification stage by revising such boundaries,(having first allowed for a change in housing requirement methodology to incorporate small sites as opposed to making assumptions about windfalls) so helping both reduce the need for the planned extent of new housing allocations and give greater permanence to Green Belt.

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

Duty to Co-operate Reason:

Suggested Modifications:

Incorporate small sites below 0.2 ha in the housing requirement calculation; introduce all brownfield SHLA sites in sustainable locations into the housing supply calculation. Revise proposed modifications by deleting some of the larger additional housing allocations that are currently in Green Belt. Revise Green Belt boundaries accordingly, and apply a more robust approach to the drafting of Green Belt boundaries so that they are not as tightly drawn to settlement boundaries. Such an adjustment to acknowledge the existence of residential curtilages and so remove such over washing from a Green Belt notation.

Comments:

Additional Evidence Link:

Main Issues and Council Response

Legal Compliance

Main Issues:

Council's Response:

Test of Soundness

Main Issues:

1. The Council has failed to consider all developable and sustainable brownfield sites for housing before using Green Belt.

2. Changing the Green Belt after the submission undermines the permanence of the Green Belt demonstrating that boundaries are too tightly drawn.

3. Additional smaller sites should be included as part of housing supply.

4. No evidence proposed increase in jobs in line with economic ambition will be taken up.

5. Questions are raised around the Sustainability Appraisal particularly in relation to the issues of climate change and flooding.

6. The relationship between the proposed higher housing requirement and the amount of allocated employment land is questioned.

7. The overall spatial distribution of development is questioned .

8. Following the Inspector's letter relating to the stage 1 hearings the Council should have re-examined its economic strategy and had greater regard to its inclusive economic strategy.

9. The outputs of the Turley Study ' Modelling the economic implications of the proposed housing requirement' are questioned, particularly the timescales which data is taken from as these cover the 'boom years' which are unlikely to be replicated.

10. The level of a buffer is insufficient. Little flexibility in the housing supply.

11. Revised densities on previous allocations have not been justified, or supported by evidence.

12. Delays to adoption of the Local Plan raise questions regarding positioning of sites in the trajectory and delivery of units on site within the plan period.

13. The Council should not rely on a windfall allowance.

14. No lapse rate has been included for site allocations.

15. A lapse rate to extant planning applications should be applied.

16. Object to inclusion of sites not considered available or deliverable previously.

17. The housing requirement should be identified as a minimum.

Council's Response:

1. The site selection methodology (EV51) demonstrates the extent of the consideration of brownfield land. Sites that are demonstrated as being deliverable have generally been allocated.
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. Following the Stage 1 Hearings into the Calderdale Local Plan Publication Draft, the Inspector raised concerns in that it was considered the Plan's provision for housing would not adequately support the employment growth advanced in the Plan. It was suggested that further work would be necessary to assess the implications of housing need and requirement figures which align more closely to the Plan's economic strategy. Subsequently, it has been determined that additional sites are required.

When selecting the additional sites required, the Council followed processes set out in both the site selection methodology (EV51) and document EV 09 Exceptional Circumstances for the Release of Green Belt (2018). 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.

3. The Council has used a reduced threshold of 0.2ha for site allocations. Whilst many smaller sites are also identified in the SHLAA, these are likely to come forward as part of the windfall allowance forming part of the housing supply in the Local Plan.

4. The Council considers that the methodology adopted in the Employment Land Study (EV1) meets the requirements of National Planning Policy Guidance.

5. The Sustainability Appraisal was undertaken using the Sustainability Appraisal Framework developed and adopted by the Council following consultation earlier in the plan making process. Two of the 17 Sustainability Appraisal Objectives concern reducing the risk of flooding and reducing CO2 emissions and the revised housing requirement figure and additional allocations have been appraised against these objectives with the results influencing the final decisions.

6. Whilst the revised housing requirement figure is higher than in the Publication version of the Local Plan the amount of land allocated for employment land has not changed. The Council considers that the assessment of land requirement for employment as indicated in the Employment Land Study (EV.01) the Employment Technical Paper (EV.02) and the response to the Inspector's Stage 1 MIQs (CC.01), is soundly based.

7. In allocating additional sites the Council followed the approach set out in section 5 of the consultation document 'Housing Requirement Update and Potential Supply' (CC39). Further information is contained in 'Addendum to Exceptional circumstances for the release of Green Belt Technical Paper (CC38).

8. The Council's Cabinet agreed the adopted approach, which has been the subject of this consultation, following consideration of different options. (see CC31 Report to Councils Cabinet – 14th October 2019 Potential modifications to the draft Local Plan following receipt of the Planning Inspector's Post stage 1 hearings letter, CC32 Minutes of the Cabinet meeting 14th October 2019, and CC33. Sustainability Appraisal of options).

9. The Turley report was undertaken by consultants specialising in this area of work in order to further examine the relationship between economic growth and housing. The data used is consistent with that normally employed for this type of Study. As the Plan will be reviewed every 5 years should more recent data be available then this will inform these reviews.

10. The updated Housing Technical Paper (published March 2020) demonstrates a buffer in the order of 600 dwellings providing flexibility in the housing supply. Irrespective of this level of supply it is highly unlikely that a significant increase in delivery will take place in the early part of the Plan period (the 'Housing Delivery Test Action Plan' supports this view). The NPPF requires the Local Plan to be reviewed every 5 years when any potential shortfall in supply would be addressed.

11. The revised contributions to the housing supply from some of the mixed use sites are to be explored in the' Mixed Use Sites Capacity Review' to be undertaken by consultants on behalf of the Council and prior to the next set of hearings.

12. The updated Housing Technical Paper (published march 2020) has reviewed the positioning of sites and addresses these issues.

13. NPPF 2012 (para 48) allows for a windfall allowance where justified (re-affirmed in NPPF 2019 - para 70). See Evidence Document EV 33 Housing Technical Paper (2018) paragraphs 6.9 – 6.12 and Appendix 1, and subsequent update to the Housing Technical Paper 2020.

14. The updated Housing Technical Paper (published March 2020) demonstrates a buffer in the overall housing supply. As allocations have been subject to a rigorous assessment including their viability they are all believed to be deliverable. The 5 yearly plan reviews will address any issues arising with specific allocations.

15. The updated Housing Technical Paper (published March 2020) demonstrates how discounting (lapse rate) has been applied to extant planning permissions.

16. The additional sites were considered available and deliverable when the Publications version of the Plan was prepared but not required to meet the housing requirement in that iteration as the HRF was achieved with higher scoring sites following the sites assessment process.

17. Policy SD3 (although not part of this consultation) has been modified following the stage 1 hearings to reflect the fact that it is a minimum requirement.

Duty to Co-operate

Main Issues:

Council's Response:

Suggested Modifications

1. Undertake a full assessment of Calderdale as a whole, its settlements, constraints and capacity.

2. The IES to be quantified and made a Spatial Document and then taken into account for the economic ambition and before any further Green Belt is released above that needed for the Government Standard Method.

3.The jobs growth figure of 8,295 (FTE) to be revisited.

4. The Local Plan should have a greater buffer of housing supply (5 to 10%) to ensure that identified development needs are met.

5. Land at Hays Lane, Halifax (LP1626) should be allocated for housing to help provide such additional flexibility.

6. At least a further 1,676 dwellings need to be allocated on Green Belt release sites to meet the requirement of 15,600 dwellings as a minimum. This does not take account of any under delivery and so either safeguarded land or a buffer will need to be applied.

7. LP0331 and LP1072 should be allocated for residential development.

Council's Response:

1. This has already been undertaken both for previous iterations of the Local Plan and for the 'Revised Housing Requirement Update and Potential Supply'. No further work or modification is proposed other than the Mixed Use Sites Capacity Review'.

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

3. The Council considers that the methodology adopted in the Employment Land Study (EV01) the Employment Technical Paper (EV02) and the response to the Inspector's Stage 1 MIQs (CC.01) meets the requirements of National Planning Policy Guidance and is soundly based. The assessment of employment growth is considers a number of growth scenarios, and the most appropriate scale of growth relates to the expected jobs created by the increased accessibility and transport improvements in the West Yorkshire plus Transport Fund programme, in the context of the policy objectives of the SEP.

4. The updated Housing Technical Paper (published March 2020) demonstrates a buffer in the order of 600 dwellings which equates to just over 4%. However, capacities on some sites coming forward are greater than those allowed for in the Local Plan. Supply exceeds the level of delivery likely to be achieved, certainly in the early part of the Plan period, and therefore the issue of an overall buffer is somewhat academic. The 5 yearly plan reviews will address any supply issues that may arise. No specific modification proposed but further updating of the supply will influence the overall level of supply.

5. As the Council considers sufficient flexibility exists (see point 4 above) no such modification is proposed.

6. The buffer currently demonstrated in the updated Housing Technical Paper (published March 2020) (see point 4 above) negates the necessity for such a modification.

7. As the Council considers sufficient flexibility exists (see point 4 above) no such modification is proposed.

Document Section: 5 Identifying potential additional allocations to provide sufficient

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Representations

Comment ID **HRU1489** Site ref (if applicable):

Person ID: **10988** Name: **Mr Anthony Rae** Organisation: **Coordinator Calderdale Friends of the Earth**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

See my comments in paragraphs 21-25 of the attached single response to the consultation.

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

Duty to Co-operate Reason:

Suggested Modifications:

The proposed additional housing should be withdrawn.

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5609813

Comment ID **HRU1798** Site ref (if applicable):

Person ID: **1116208** Name: **Mrs Carol French Deol** 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 FOR FULL REPRESENTATION

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/5635273

Comment ID **HRU1812** Site ref (if applicable):

Person ID: **1245707** Name: **Mr Michael Rushton** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

The plan as proposed is not economically sound in relation to the number of dwellings per annum and economic land to support it (840dpa/73ha) when 46ha is a normal requirement unless this is considered as part of Leeds city region in which case Calderdale would be happy to become a large dormitory and any new business rates would be diverted to Leeds and not benefit Calderdale which would suffer all the disruption. Additional sites have now been found including brown field sites that were previously overlooked so the areas in Clifton and Woodhouse are not essential but would be easier to develop and more economical for developers, sites in Greetland, Elland and a flat area in Brighouse are available. To meet the economic requirements over the life of the plan as proposed would require a further 9 sites the size of Wakefield road enterprise zone (23ha) which may be available but smaller so not as attractive but even Wakefield road does not lend itself to warehousing due to the gradient which is outside the Ministry of transport guide lines. This site also does not have funding from either Calderdale itself or part of West Yorkshire Combined Authority between 2020 and 2027/2028 nor is there funding for the proposed new junction 24A of motorway M62. The loss of habitat were the garden suburb is proposed would be serious not only for the wild life (deer, hares, foxes, squirrels to name but a few) but this land produces riverlets during heavy rains, ignore the recent storms usual summer storms do it also, and simply to build over it would just provide a run-off to exacerbate the well-documented local flooding problems. In all there is a lack of infrastructure for roads or flood alleviation so the economics do not make sense.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1966** Site ref (if applicable):

Person ID: **1116260** Name: **Mrs Sarah Tindal** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

The council have chosen option 4 from the potential decisions which has led to the increase in housing requirement. The council have not asked for comments from Calderdale residents regarding this decision which has a huge impact on the quality of life for everyone involved. The decision to increase the housing rather than reduce the economic ambition I believe is flawed. The plan is not realistic in being able to deliver the economic plan. There are currently many warehousing and other employment premises vacant in Calderdale (currently 84 premises listed); what makes the council believe that further employment land such as the EZ at Clifton (as well as other developments required to fulfil the economic growth ambition ; an additional 9 sites the same size as Clifton EZ) will be filled? Current suggestions are that there are businesses within Calderdale who would move their business from one part of the borough to another which will not provide economic growth but will rather create an area of Calderdale that becomes more deprived while another area becomes richer. In addition, the council would lose a significant sum of business rates as the money goes to Leeds rather than locally, further exacerbating the deprivation in some areas. The flooding issues experienced throughout the borough (which are worsening on each occasion) are a significant factor that I do not feel the council have robustly addressed. An increase in housing (even with flood mitigation) will make the flooding problems worse. In particular, building on Thornhills, above Brighouse, will mean a greater flow of water into the town, making the flooding in Brighouse worse. I believe the most appropriate option would be option 1 which is to reduce the economic growth to match the housing need for the borough. This option will also mean that the loss of greenbelt can now be avoided as the need can be met from the allocations found in the option to increase housing to meet economic growth option. The original claim by the council that there were exceptional circumstances to use a significant area of greenbelt across Brighouse must now, in hindsight, be unsound. The claim that there were no alternatives

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5632237

Comment ID **HRU1970** Site ref (if applicable):

Person ID: **851345** Name: **Planning Policy Kirklees Council** Organisation: **Kirklees Council**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

Kirklees Council welcomes the opportunity to comment on the proposed changes to the Calderdale Local Plan. Kirklees Council has received assurances from Calderdale Council that the proposed changes to allocate sites LP1616 (Ainley Top), LP1567 (Elland) and LP0177/LP1625/LP0952/LP0026 (Greetland) are within the range of parameters previously tested through transport modelling at an earlier stage of their Local Plan process. The council is reviewing the information provided by Calderdale Council in relation to potential impacts on the Kirklees highway network and reserve the right to make further comments once the review of the information has concluded.

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 **HRU1979** Site ref (if applicable):

Person ID: **1246540** Name: **Countryside Properties** Organisation: **Countryside Properties**

Agent ID: **691692** Name: **Ms Lucie Jowett** Organisation: **Senior Planner Barton Willmore**

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

Legal Compliance Reason:

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

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION The Council has amended its housing requirement throughout the preparation of the Local Plan which resulted in some sites being allocated and then deleted from the Local Plan. Within the Local Plan Initial Draft the housing requirement (2017-2032) was 16,871 over the Plan Period, or 1,125 per annum. Sites were identified within the Initial Draft to meet this requirement. Following the Government's publication of the consultation on the standard housing methodology

approach to calculating Local Housing Need in September 2017, the Council resolved to proceed with the Local Plan on the basis of this methodology and a range of options for determining the housing requirement were considered by Members in February 2018 to determine the level of need. The option which had been calculated using the standard housing methodology, and excluded an uplift for undersupply, employment growth and flexibility of choice of sites was selected. This reduced the housing requirement to just 12,600 homes over the plan period, or 840 per annum. Given the reduction from the Initial Draft Plan, the Council sought to delete some of its previously proposed housing allocations. It is important to note that those sites which were not carried forward to the Publication Draft Plan were only excluded due to fewer allocations being required and not due to technical constraints. Current Methodology A Report on considered and rejected potential sites accompanying this consultation has been prepared by the Council (CC37). Only 21 sites have been re-considered by the Council for allocation. In determining the most suitable sites for allocation, it states that those sites proposed in both the Local Plan Initial Draft (2017) and the subsequent Publication Draft of the Local Plan (2018) were reviewed along with sites that had been rejected (filtered). It states that those sites which did not have fundamental issues which were rejected based on -“the supply of more suitable and available sites elsewhere"formed the basis of the additional sites. 4.8 Potential additional sites were then assessed within the Report using the existing methodology for the Publication Draft of the Local Plan. In addition to CC37, a Technical Note on the Impact of Potential Housing Allocations on Hipperholme Crossroads has been produced by the Council in November 2019 (CC35) which sets out the basis for the decision to filter a number of potential residential Local Plan sites in the Hipperholme Area. A technical note has been prepared by iTransport and is appended to these representations. It demonstrates that the Council has not considered each site in relation to its impact on the Hipperholme Crossroads. When considering the impact of this site, it is concluded that only a very limited volume of development trips would pass through the crossroads and this would be of a level that would fall within typical day to day variation in traffic flow. There is no evidence available from the Council to conclude that the crossroads is incapable of accommodating further development generated traffic.

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/5632466

Comment ID **HRU1990** Site ref (if applicable):

Person ID: **855708** Name: **Barratt Homes & David Wilson Homes** Organisation: **Barratt Homes & David Wilson Homes**

Agent ID: **691692** Name: **Ms Lucie Jowett** Organisation: **Senior Planner Barton Willmore**

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

Legal Compliance Reason:

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

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION A Report on considered and rejected potential sites accompanying this consultation has been prepared by the Council (CC37). Only 21 sites have been re-considered by the Council for allocation. In determining the most suitable sites for allocation, it states that those sites proposed in both the Local Plan Initial Draft (2017) and the subsequent Publication Draft of the Local Plan (2018) were reviewed along with sites that had been rejected (filtered). It states that those sites which did not have fundamental issues which were rejected based on -“the supply of more suitable and available sites elsewhere"formed the basis of the additional sites. Potential additional sites were then assessed within the Report using the existing methodology for the Publication Draft of the Local Plan. Only three of our Client's sites have been reassessed as part of this consultation, sites LP0773, LP1583 and LP0979. We have significant concerns with the conclusions of the assessments of these sites. Our Client has been engaged throughout the Local Plan process but despite this there are fundamental errors within the Council's Report such as them stating that there is no developer on board for these sites. Site LP0982 has not been re-assessed despite previously being allocated within the Local Plan Initial Draft for up to 61 dwellings. This is contrary to the Council's methodology which sought to review inter alia those sites proposed in both the Local Plan Initial Draft and Publication Draft. The site was previously allocated and so clearly has no fundamental issues. The only reason the site was not taken forward in the Publication Draft Plan was due to a reduction in the Council's housing requirement. All of our Client's site remain suitable and available for development and should be allocated for development within the Local Plan. They are the largest housebuilder in the UK and have the knowledge and experience to deliver new homes on a variety of sites . These are assessed in greater detail within these representations.

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/5632467

Comment ID **HRU1999** Site ref (if applicable):

Person ID: **960869** Name: **Stonebridge Homes** Organisation:

Agent ID: **691692** Name: **Ms Lucie Jowett** Organisation: **Senior Planner Barton Willmore**

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

Legal Compliance Reason:

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

Sound Reason:

PLEASE SEE ATTACHED FOR FULL REPRESENTATION A Report on considered and rejected potential sites

accompanying this consultation has been prepared by the Council (CC37). Only 21 sites have been re-considered by the Council for allocation. In determining the most suitable sites for allocation, it states that those sites proposed in both the Local Plan Initial Draft (2017) and the subsequent Publication Draft of the Local Plan (2018) were reviewed along with sites that had been rejected (filtered). It states that those sites which did not have fundamental issues which were rejected based on -“the supply of more suitable and available sites elsewhere"formed the basis of the additional sites. Potential additional sites were then assessed within the Report using the existing methodology for the Publication Draft of the Local Plan. Site LP1541 has not been re-assessed despite previously being allocated within the Local Plan Initial Draft for up to 76 dwellings. This is contrary to the Council's methodology which sought to review inter alia those sites proposed in both the Local Plan Initial Draft and Publication Draft. The site was previously allocated and so clearly has no fundamental issues. The only reason the site was not taken forward in the Publication Draft Plan was due to a reduction in the Council's housing requirement. Since this time, the Council has produced a Technical Note on Hipperholme Crossroads (November 2019) (CC35) which sets out the basis for the decision to filter all potential residential Local Plan sites in the Hipperholme area which are in the Green Belt. The Council's decision to not consider any additional sites in this area is fundamentally flawed and not based upon evidence. Hipperholme Crossroads The conclusions of the Council's assessment of our Client's site states that -“the incombination effects of additional land released from the Green Belt within the Hipperholme area will have a significant and demonstrable detrimental impact on the A58/A644 junction outweighing the benefits attributable to the additional housing"We strongly disagree with this assessment and it is not justified to simply filter all Green Belt sites in this area. The Council has stated within their November 2019 Technical Note (CC35) that they are unable to promote any sites within the Hipperholme area, however several sites have been allocated. There is no justification as to why some sites have been allocated and others not, other than it would seem that the Council has just sought to exclude all Green Belt sites. The Technical Note states that -“additional land released from Green Belt would have a large and unacceptable impact on congestion"This is not based on any evidence. Modelling was undertaken in March 2017 of the Local Plan preferred sites with and without the proposed allocations in Hipperholme. The results showed a marginal worsening for the Hipperholme crossroads by modelling of the additional sites. Technical note 5: Hipperholme Sensitivity Test (EV54.6) states that the -“traffic modelling exercise has not given sufficient evidence to support the rejection of these sites, given that they are relatively sustainable, being close to the village centre amenities, located on a high frequency bus routes and on brownfield land"(paragraph 5.3.2). There is no evidence to demonstrate that our Client's site would result in an unacceptable impact on this junction and no evidence that the Council has undertaken any work to show the impact which would occur from allocating further sites. Our Client's site is a Green Belt site and so has been filtered on the basis that it would impact upon the crossroads. This is despite it being situated within a highly sustainable location, close to village amenities on a high frequency bus route. This demonstrates that the Council's approach is fundamentally flawed and not based upon evidence

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/5632468

Comment ID **HRU2040**

Site ref (if applicable):

Person ID: **1185901** Name: **Avant Homes** Organisation:

Agent ID: **1139514** Name: **Nathan McLoughlin** Organisation: **Mcloughlin Planning**

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

PLEASE SEE ATTACHED FOR FULL REPRESENTATION The need to make additional housing allocations to meet the revised housing requirement is inevitable, as the difference between the Plan's current target and that put forward in the HRU is 200 dwellings per annum, which equates to an additional 3,000 dwellings over the Plan period. This cannot be met without recourse to allocating additional sites. In allocating sites to meet the increased housing need, Avant's position is that additional Green Belt land has to be released. In supporting this position, Paragraph 14 of INS07 shows that the Council cannot point to - “specific evidence"to demonstrate that the furtherrelease of Green Belt land to meet the higher housing requirement would cause unacceptable harm to the Green Belt. In releasing land from the Green Belt, - “exceptional circumstances"must be demonstrated. Case Law in the form of Compton PC, Ockham PC & Cranwell v Guildford BC, SSHCLG & Ors [2019] EWHC 3242 (Admin) provides clarification on the - “exceptional circumstances"supporting Green Belt release. Paragraphs 71 and 72 of the judgement make it clear that the exceptional circumstances test is an exercise of planning judgement, when faced with the particulars of the local situation, when reviewing the Plan. In this instance, given the: "¢ Need for additional housing (3,000 units more than the Reg 19 Consultation). "¢ Insufficient availability of previously developed land. "¢ The nature of the Green Belt boundary around the major urban areas of the Borough and the need for sustainable patterns of development. These factors lead to the inevitable conclusion that in order to accommodate the levels of development proposed, further Green Belt release is necessary. This conclusion is supported by Documents EV09 and EV51.1. Finally, given the lack of evidence to demonstrate the harm associated with additional Green Belt release, the case for additional release (including Avant's land at Elland) is inevitable.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

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

Comment ID **HRU2164** Site ref (if applicable):

Person ID: **1184963** Name: **Kim Boothroyd** 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 FOR FULL REPRESENTATION In the previous consultation, Calderdale Council justified the 'garden suburbs' on the basis there was insufficent brownfield sites available for the amount of housing required. Calderdale have now stated that 2000 houses could be built on brownbelt land. If Calderdale have 'suddenly' found all these additional brownbelt sites why are Calderdale still wanting to build on greenbelt land? Why do Calderdale need to build on Thornhills, Clifton if this is not now needed if they had matched the economic figures and housing in the original document? There are so many contradictions as to what Calderdale are saying regarding why they 'had' to use greenbelt land.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5634795 ; http://calderdale-consult.objective.co.uk/file/5634798

Comment ID **HRU2171** Site ref (if applicable):

Person ID: **1129942** Name: **Norah Smith** Organisation:

Agent ID: **1246896** Name: **Gen Kenington** Organisation: **Associate Director Johnson Mowat Planning Ltd**

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION The total supply in Table 2 from allocations is 11,882, which is an increase of 2,422 dwellings from the Publication Version (Table 6.10). 1,996 of these allocations are additional sites. It is not clear from the consultation document where the Council have gained a further 426 dwellings (difference between the 1,996 additional site capacity and the 2,422 difference in allocations from the Publication Draft). Clarity is sought from the Council on this matter. In the first instance, it is not considered that the Council have identified sufficient additional sites (for reasons stated above). Secondly, we have concerns with the Council's approach and 'key considerations' taken in identifying additional sites. Of the additional sites identified, there are no additional residential sites identified in Brighouse, and one mixed use site in Brighouse with a residential capacity of 200 dwellings. The Council state that one of the key considerations was the -“need to minimise further release of Green Belt around Brighouse given the high level of release already proposed here"(CC37 Potential Sites ; Considered and Rejected). We object

to this approach and the resultant lack of additional sites identified in Brighouse, when Brighouse is recognised, alongside Halifax in the Local Plan, as the areas with the greatest opportunities for new growth. Given the environmental constraints in the Borough, including flood risk, the continued focus on Halifax and Brighouse should remain. An existing proposed high level of Green Belt release around Brighouse does not justify the approach taken to now minimise additional releases. This is not a sustainable approach to plan-making and appears to be more politically driven. Flood Risk We have concerns with a number of the identified additional sites, which have been assessed and have known flooding and/ or drainage issues. In light of the recent flooding in the District and in recent years (Boxing Day floods in 2015) it is considered particularly important to avoid areas with known flood risk issues, particularly given that previous flood alleviation works have not prevented flooding in the Calder Valley (Storm Ciara and Storm Dennis ; February 2020). There are a number of sites identified in the Additional Sites which are located in high risk flood areas or in areas with known flooding issues. These sites are seemingly identified to negate the need for additional Green Belt sites. This Council's Local Plan Working Party on 9th October 2019, which discussed the potential modifications to the Local Plan and the need to increase the housing requirement and identify additional sites considered the 'Sustainable Option' to remove the need to identify additional Green Belt sites and one approach included: -“Highly sustainable brownfield sites within and close to town centres that are currently discounted on flooding grounds will as a result of investment over the Plan period become developable."This approach appears to have been used by the Council in identifying additional sites, given that there are a number of sites with identified flooding issues. It is considered a high-risk approach, to rely on future flood alleviation investment works, which are not guaranteed to come forward. There are no details within the consultation information on the proposed flood alleviation proposals to justify how sites identified in high risk flood areas can be safely delivered. The only additional site identified in Brighouse (Brownfield Mixed use site LP0573 Mill Royd Street) with a residential capacity of 200 dwellings is located in Flood Zone 2 (17.43%), 3a (20.6%) and 3a (i) (61.96%). The Site Assessment for this site refers to -“Flooding issues with no possibility of mitigation." Despite this, the site is identified, a Sequential Test will need to be passed, as well as a detailed site-specific Flood Risk Assessment, with the site only being brought forward later in the plan period to take advantage of future planned flood alleviation schemes. There are known suitable alternative sites outside high risk flood zones in Brighouse, which should be considered ahead of Site LP0573. Site LP1472 is such an example, which has no identified flood risk issues, and is in a sustainable location on the edge of Brighouse. Site LP0177 (Land adjacent to Ellistones Place, Saddleworth Road, Greetland) is an identified additional site, with a residential capacity of 200 dwellings. 20% of the site is in Flood Zone 3a. This site is identified as being at risk from two water courses and is suitable for development after FRA of the water course and evaluation of existing drainage network. The Site Assessment states that -“both a Sequential Test and Exception Test would be required to demonstrate that the site is physically capable of development." There is clearly uncertainty with this site, yet is it included as an additional site. Why include the site when there are other suitable alternative sites that are not subject to Flood Risk? Site LP0327 (Land off Halifax Road, Todmorden) is identified as a Mixed Use site with a residential capacity of 38 dwellings. 100% of this site is in Flood Zone 3a and 3a(i). The overall assessment summary for this site states: -“With 49% of the site within Flood Zone 3ai and the remainder in flood Zone 3a JBA consulting recommended that the site be subject to an Exception Test. As a result, the Council has undertaken a Level 2 Strategic Flood Risk Assessment which states that the site appears to be unsuitable for redevelopment due to current flood risk . There are significant depths of flooding on the site which range from 0.6m to 2.1m."(underlining our emphasis). Despite this, the Council identify the site as an additional site. There are also a number of identified additional sites that despite falling within Flood Zone 1, have identified flooding issues in the Council's Site Assessment Reports. There are three sites identified in Mytholmroyd area, which has recently been affected by flooding during Storm Ciara and Storm Dennis "¢ LP0931 ; Land at Greave House Field, Luddenden ; 44 dwellings. Flooding is highlighted as an issue but the site assessment refers to flooding issues can be mitigated. "¢ LP1372 Kershaw Drive, Luddenden Foot ; 47 dwellings. Land drainage issues identified / reported. 'flooding issues which can be mitigated' "¢ LP1622 Top Land, Crag Vale,

Hebden Bridge ; 50 dwellings. Same as above. "¢ LP1567 Land adjacent to Exley Lane, North of Elland ; 450 dwellings. Although not in Mytholmroyd, the site lies within Flood Zone 1, however the flooding comments refers to the site being at risk of flooding from two water courses and requires mitigation -“Defence lines of both drains and Flood resilience and resistance."In light of the recent flooding, it is considered the Council should be taking a more cautious approach in identifying potential additional sites with associated flood risk issues. Further assurance is needed that the flooding issues can be mitigated for such sites. The above examples cast doubt on a number of identified additional sites that the Council are proposing. It is considered that an alternative approach is required, one which includes the re-visiting of sustainable Green Belt sites, with no identified flood risk issues.

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

Duty to Co-operate Reason:

Suggested Modifications:

Increase housing requirement to minimum of 15,600 Identify additional housing sites Identify LP1472 as a Housing Allocation

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5634580

Comment ID **HRU2197** Site ref (if applicable):

Person ID: **1181617** Name: **Miss Allison Rushton** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

The fact that Calderdale have now identified further areas to allocate for housing in its self raises the question why these sites were not identified at the time the original draft plan was submitted. As the revised submission is silent on the corresponding economic growth figures for the new proposed number of houses per annum, this seems to suggest that the housing numbers have been generated to support economic growth rather than using realistic evidence based economic growth figures as the starting point to then identify the required housing need. Had these additional housing sites been identified at outset there would have be no need to have the Thornhills area of Clifton released from greenbelt status as an exception. I consider it perverse and hypocritical that Calderdale wants to destroy greenbelt, with all the ecological benefits of water retention, carbon capture and promoting a diverse wildlife, given that at the start of 2019 Calderdale declared a climate emergency. The current infrastructure in the Calderdale and Clifton simply cannot sustain the proposed amount of housing development. The road system is already at gridlock, especially during the rush hour, and the village of Clifton will be used as a rat run. The school in Clifton is always over-subscribed and there are children who live in the village who are forced to travel to school because they cannot obtain a place at the village school ; the provision for additional schools

outlined in the original draft plan has been ill thought out and does not meet the legal requirements for the amount of floor space per child ; an extremely basic oversight by those involve in the creation of the plan. The proposed additional housing numbers will cause further issues for those who need access to dental and medical facilities which are also at breaking point. It is currently impossible to register with an NHS dentist in the Brighouse area and I know from personal experience that the waiting time for a non-urgent appointment to see a doctor at Church Land Surgery in Brighouse is 4 weeks ; how will the additional population's basic health needs be addressed ; this question has not been answered. The original draft plan suggested that South East Calderdale would take more than 40% of the borough's development because of its proximity to the M62. However, it appears highly unlikely that Junction 24a will be developed based on statements made by the Highways Agency and the funding position. West Yorkshire Combined Authority's latest Transport Fund (Financial) plan predicts a requirement of Â£18.5m to fund Junction 24a, this has approved funding of Â£0.07m, the total spend to date is Â£40,000, and there is no planned spend between 2019/20 and 2027/28. See https://westyorkshire.moderngov.co.uk/documents/s14779/Item%206%20-%20Appendix%201.pdf I believe the development of this new motorway junction is crucial to sustainable development in the South East of Calderdale and if this does not proceed, the proposed development of both housing and industrial development in the area will be unachievable and undeliverable. Although flood defence plans in other areas such as Hebden Bridge and Mythomroyd are being implemented, the overall effect of these engineering projects is that more water is being forced into areas lower down the Calder Valley such as Sowerby Bridge and Brighouse making them more liable to serious flooding. Whilst I appreciate that these major flood defences are needed, the simple fact is that the water has to go somewhere and therefore the risk of flooding in other areas lower down the Calder valley is only going to increase due to this and the impact of global warming. Areas of Greetland also experienced similar flooding where housing development is proposed - please see attached photo of the sign advertising development of 39 houses in the middle of what is now a lake Other areas of Brighouse were also seriously impacted again by flooding on that weekend, including the area on Mill Royd Lane which is one of the additional areas that has now been identified as suitable for 200 dwellings which were not included in the original draft plan. The motor sales company which currently operates from this location lost all their stock as a result of the flooding, so how can Calderdale justify adding this area as suitable for housing when the same area was severely affected by the Boxing Day 2015 floods and has been inundated again now ; please see attached photographs of flooding in this area . Mill Royd Lane flooding 3 shows the exact proposed housing site and the other 2 Mill Royd Lane photos are of the main road that borders the proposed housing site I am also concerned that the allocation of affordable homes for the so called Garden Village in Clifton has been reduced further from that shown in the original draft plan. The number of affordable homes detailed in the original plan was lower than the standard ratio requirement for Calderdale. Why? On what grounds can using a lower ratio than the standard be justified? Calderdale needs more affordable housing for average families, not less, and fewer large executive type homes which are unaffordable to the majority of the residents of Calderdale. This ratio appears to have been reduced even further ; why is this and how can such a further reduction be justified? Calderdale needs more affordable housing not less. Why propose building such a large development when local people will not be able to buy them? This will simply mean that the development will become a magnet for commuters who work outside of Calderdale but find the location attractive due to its proximity to the motorway network. This will have the effect of increasing 'out commuting' to locations such as Leeds and Manchester when 40% of Brighouse residents currently work outside Calderdale.

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/5634787 ; http://calderdale-consult.objective.co.uk/file/5634785 ; http://calderdale-consult.objective.co.uk/file/5634788 ; http://calderdale-consult.objective.co.uk/file/5634789 ; http://calderdale-consult.o

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Comment ID **HRU2204** Site ref (if applicable):

Person ID: **1163507** Name: **Mrs Janet Stanley** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

With regards to the additional housing allocations in South East Calderdale, we did not support the council's original plan of South East Calderdale taking more than 40% of Calderdale's housing development, and as in our previous communications, reiterate that South East Calderdale could not cope with the original housing plan and in no way could cope with the further increase due toa severe lack of infrastructure. The M62 Junction 24A is likely not to happen. For J24A, the WYCA predicts a requirement of Â£18.51 million funding requirement and only Â£0.07m has been approved. The total spend to date is Â£40,000 and there is no planned spending between 2019/20 and 2027/28. In addition, the M62 J22 proposed 'improvements' will clog up further down the Calder Valley. It is not only additional road infrastructure which cannot be met, but also medical, educational, social and drainage infrastructure. Calderdale has now released housing plans for brownfield sites in South East Calderdale ; and added sites that were previously rejected. Why were these sites not used in the first place prior to the original garden Suburbs being planned on greenbelt at Thornhills and at Woodhouse? This shows that the council's document 'Exceptional use of green belt' is flawed.

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 **HRU2207** Site ref (if applicable):

Person ID: **11325** Name: **Mr Graham Stanley** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

With regards to the additional housing allocations in South East Calderdale, we did not support the council's original plan of South East Calderdale taking more than 40% of Calderdale's housing development, and as in our previous communications, reiterate that South East Calderdale could not cope with the original housing plan and in no way could cope with the further increase due toa severe lack of infrastructure. The M62 Junction 24A is likely not to happen. For J24A, the WYCA predicts a requirement of Â£18.51 million funding requirement and only Â£0.07m has been approved. The total spend to date is Â£40,000 and there is no planned spending between 2019/20 and 2027/28. In addition, the M62 J22 proposed 'improvements' will clog up further down the Calder Valley. It is not only additional road infrastructure which cannot be met, but also medical, educational, social and drainage infrastructure. Calderdale has now released housing plans for brownfield sites in South East Calderdale ; and added sites that were previously rejected. Why were these sites not used in the first place prior to the original garden Suburbs being planned on greenbelt at Thornhills and at Woodhouse? This shows that the council's document 'Exceptional use of green belt' is flawed.

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 **HRU2208** Site ref (if applicable):

Person ID: **1139653** Name: **Mr James Leslie Stanley** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

With regards to the additional housing allocations in South East Calderdale, we did not support the council's original plan of South East Calderdale taking more than 40% of Calderdale's housing development, and as in our previous communications, reiterate that South East Calderdale could not cope with the

original housing plan and in no way could cope with the further increase due toa severe lack of infrastructure. The M62 Junction 24A is likely not to happen. For J24A, the WYCA predicts a requirement of Â£18.51 million funding requirement and only Â£0.07m has been approved. The total spend to date is Â£40,000 and there is no planned spending between 2019/20 and 2027/28. In addition, the M62 J22 proposed 'improvements' will clog up further down the Calder Valley. It is not only additional road infrastructure which cannot be met, but also medical, educational, social and drainage infrastructure. Calderdale has now released housing plans for brownfield sites in South East Calderdale ; and added sites that were previously rejected. Why were these sites not used in the first place prior to the original garden Suburbs being planned on greenbelt at Thornhills and at Woodhouse? This shows that the council's document 'Exceptional use of green belt' is flawed.

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 **HRU2225** Site ref (if applicable):

Person ID: **1246930** Name: **Woodhouse Residents Association** Organisation: **Woodhouse Residents Association**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

See attachment

Do you consider the plan to be Sound?:

Sound Reason:

See attachment

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5635134 ; http://calderdale-consult.objective.co.uk/file/5635135 ; http://calderdale-consult.objective.co.uk/file/5635136

Main Issues and Council Response

Legal Compliance

Main Issues:

Council's Response:

Test of Soundness

Main Issues:

1. The list of qualitative factors used to appraise proposed additional sites does not include traffic generation and associated carbon emissions.

2. Lacks reference to the wider sustainability issues raised by an increase in the housing allocation. Lack of consideration of cumulative impacts, particularly on the local road network.

3. The plan as proposed is not economically sound in relation to the number of dwellings per annum and economic land to support it.

4. Garden Suburbs are not required as further brownfield sites can be found as the Council has managed to do for this consultation.

5. Loss of habitats where the Garden Suburbs are proposed.

6. Garden Suburb sites provide water storage during heavy rainfall.

7. Concerns regarding reassessment of sites.

8. The Council has not identified enough additional sites.

9. Concerns regarding the Council's approach and 'key considerations' in identifying additional sites.

10. Concerns regarding the identification of additional sites which have flooding constraints, and/or were flooded during storms in 2020.

Council's Response:

1. / 2. 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 report 'Modelling the implications of the proposed housing requirement' (CC.21) was undertaken by consultants specialising in this area of work in order to further examine the relationship between economic growth and housing. Given that local authorities must provide for the housing requirement in their SHMAs, in order to have a sound plan, the Council would run the risk of the plan being found unsound should it ignore its findings.

4. 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. If viable unconstrained/surmountable constrained large scale brownfield opportunities were proven to exist the Council would reconsider the distribution to take advantage of these.

5. Numerous ecological reports have been undertaken to support the allocations and are in the Examination Library under SS35-LP1451 and SS36-LP1463

6. Flood Risk and Drainage reports have been undertaken to support the allocations and are in the Examination Library under SS35-LP1451 and SS36-LP1463

7. The additional sites were assessed using the existing methodology employed for the Publication Draft of the Local Plan.

8. The Council has identified enough sites to meet the housing need/requirement.

9. The key considerations were used to temper the sequential approach to site selection.

10. Sites with significant flooding constraints have been rejected in line with the Site Allocation methodology and NPPF unless there have been wider sustainability benefits and the development can be made safe without impacting elsewhere.

Duty to Co-operate

Main Issues:

Council's Response:

Suggested Modifications

Council's Response:

Document Section: 5.1 Paragraph

Representations

Comment ID **HRU1395** Site ref (if applicable):

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

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

In view of the proposed increase in land being taken from the Greenbelt (100% of additional sites in Shelf and Northowram are in the green belt) the Council must now change its policy of excluding sites below 0.25ha from proposed allocations. In addition, the Council must take a more robust stance on housing densities and adopt as a matter of course a building density of >45dpha. This is a more efficient, sustainable use of land and will remove all of the additional sites being proposed in unsustainable rural locations.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Main Issues and Council Response

Legal Compliance

Main Issues:

Council's Response:

Test of Soundness

Main Issues:

1. The Council should allocate housing on sites below 0.25ha.

2. Housing densities should be >45dph

Council's Response:

1. Sites which were below 0.25 hectares were filtered from allocation. Many other local authorities have traditionally used a site size of 0.4 hectares, however due to the important contribution of small sites historically in Calderdale it is believed a 0.25 hectare threshold is more appropriate. Planning Practice Guidance states that a range of different sized sites will be required to deliver the required scale of development. It suggests that sites should be assessed which could support 5 or more dwellings or economic development sites of 0.25 hectares. Sites below 0.25 ha are likely to come forward as windfalls where an assumption has been made as to their contribution to housing numbers. Where appropriate, sites below 0.25 hectares have been amalgamated with another site to take it above the site size threshold.

2. 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.

Duty to Co-operate

Main Issues:

Council's Response:

Suggested Modifications

Council's Response:

Document Section: 5.2 Paragraph

Representations

Comment ID **HRU1397** Site ref (if applicable):

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

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Whilst a site's ability to deliver wider regeneration and infrastructure benefits is an important consideration, we must point out that none of the sites in Shelf and Northowram will deliver any regeneration or infrastructure benefits and cannot be considered to be sustainable. There are 7 additional sites proposed for Shelf and Northowram and we would comment as follows for the factors considered under this section. The role and character of the area All but one of the sites are open fields crossed or bounded by dry stone walls and in some cases public footpaths. Shelf and Northowram are characterised by their open fields interlaced with dry stone walls. Walking across or alongside open fields makes an important contribution to a sense of well-being. The need to promote the vitality of the main urban areas Shelf and Northowram are small, Tier 4 settlements in a rural area and development here will not contribute directly to the vitality of urban areas. The need to protect the Green Belt 100% of the additional sites are on green belt. Recognising the intrinsic character of countryside All 7 sites are located in the countryside on the edge of the settlements and the majority are used for grazing or agricultural activities. Several incorporate or are adjacent to farms. Conserving and enhancing the natural environment Building on open grassland used for grazing and crossed by characterful dry-stone walls and hedges cannot be considered as Conserving and enhancing the natural environment. Having due regard of development impact on SPA/SAC Not applicable Reducing pollution The A6036 running through Shelf is already over capacity leading to long delays and traffic jams at peak times. Development of more sites in Shelf and Northowram in addition to those already proposed will force even higher volumes of traffic onto overloaded junctions and importantly through the highly sensitive Hipperholme crossroads, creating even more air pollution. Preferring land of lower environmental value What is often overlooked when considering 'environmental value' is the habitat value of dry-stone walls and hedges, even though the site itself may not have a specific policy designation. All of the additional sites in Shelf and Northowram are farmland or grassland which cannot e regarded as 'lower environmental value'. Utilising previously developed landwhere it is not of high environmental value and potential development is considered to be viable With the exception of a couple of farms all of the sites are greenfield. See also our comment above. Conserving heritage assets This is best dealt with under the individual allocations

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 **HRU1700** Site ref (if applicable):

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:

The principal issue is that of housing density. It is recognised that the "Sustainable Option", referred to at 3.4, reduces the take from Green Belt from 551ha to 499ha (Report to Cabinet 14 October 2019), a reduction of 9.4%. This is helpful, but only scratches the problem. The real solution is to re-examine the expected housing densities across the board, not just at the mixed-use sites around Halifax. While the Draft Plan sets a minimum density of 30dph, we fully support Andrew Wood's suggestion of the adoption of at least double that. This would enable the housing requirement to be delivered without any take from Green Belt, and could substantially reduce the scale of the Brighouse schemes. A secondary problem is that the proposals offer no evidence of a sustained and pro-active exploration of the potential of brown field sites, despite the exhortations in the NPPF. Although the original Draft Local Plan was submitted prior to 24 Jan 2019, we are unclear whether the latest proposals are to be judged under the 2012 or the 2019 versions of the NPPF. Because of their reliance on Green Belt land though, the proposals fail under both versions:- NPPF 2012: Para 84 requires authorities to " "¦take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt "¦." The proposals offer no evidence of this. Para 88 requires authorities to " "¦ ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations." We submit that the wish to meet an inappropriately derived housing target does not outweigh the potential harm to the Green Belt that would by caused by the proposals, since a systematic exploration of the potential of brownfield sites and the use of higher housing densities would together make the harm to the Green Belt totally avoidable. NPPF 2019: Para 136 states: "Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. "¦." We submit that the evidence for the housing target is based on inappropriate population and job projections. Together with the lack of evidence about brownfield potential and of housing density assessment, this means that full evidence to justify exceptional circumstances does not exist. For the same reasons, the proposals fail under Para 137, with its explicit requirements to demonstrate examination of all other reasonable options for meeting identified need, including the use of brownfield and underutilised land, and the consideration of housing densities. Similarly, Para 138 requires that " "¦Where it been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously

developed and/or is well served by public transport. "¦.." There is no evidence that this has been done. Para 139 f) states: "When defining Green Belt boundaries, plans should define boundaries clearly, using physical features that are readily recognisable and likely to be permanent." Of the 7 sites proposed for use in Northowram and Shelf, 6 of the site summaries note the requirement for creation of strong and defensible boundaries, although the sites simply do not have the physical features needed to form them. The construction of e.g. of walls on arbitrary boundaries, unrelated to a physical feature, do not cut it.

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

Duty to Co-operate Reason:

Suggested Modifications:

The Council should revisit the issues of housing density across the whole district, and it it should explore in depth the potential for use of brownfield and underutilised land.

Comments:

Additional Evidence Link:

Comment ID **HRU2343** Site ref (if applicable):

Person ID: **1246930** Name: **Woodhouse Residents Association** Organisation: **Woodhouse Residents Association**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

See attachment

Do you consider the plan to be Sound?:

Sound Reason:

See attachment

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5635134 ; http://calderdale-consult.objective.co.uk/file/5635135 ; http://calderdale-consult.objective.co.uk/file/5635136

Main Issues and Council Response

Legal Compliance

Main Issues:

Council's Response:

Test of Soundness

Main Issues:

1. The additional qualitative factors for identifying land for allocation have not been used effectively.

2. Densities on housing sites too low. The Council should re-examine the expected housing densities across all the sites, reducing impact on the Green Belt.

3. No evidence of a sustained and pro-active exploration of the potential of brown field sites, despite the exhortations in the NPPF. The need to meet housing requirement does not outweigh the potential harm to the Green Belt that would by caused by the proposals, since a systematic exploration of the potential of brownfield sites and the use of higher housing densities would together make the harm to the Green Belt totally avoidable.

4. No exceptional circumstances have been demonstrated to alter Green Belt boundaries.

5. The construction of walls for example does not constitute a strong defensible Green Belt boundary.

Council's Response:

1. The additional sites were assessed using the existing methodology employed for the Publication Draft of the Local Plan. The key considerations were used to temper the sequential approach to site selection.

2. Density is either based on recognised density multipliers or information provided by developers. For mixed use sites the capacities/densities are to be explored in the' Mixed Use Sites Capacity Review' to be undertaken by consultants on behalf of the Council and prior to the next set of hearings.

3. Prior work including that of the local Urban Capacity Study and National Land Use Database have helped inform knowledge about potential sites or locations for Development. Document EV 51.1 Site Allocations Assessment Methodology - Publication Draft (2018) details the process the Council has followed in relation to the site assessment process. The document outlines the various stages of assessment from initial site identification to the implementation of the Sequential Approach. 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. With regard to densities, 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.

4. 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.

5. Where changes to the Green Belt boundary are required as a result of allocations for development, a site specific policy will ensure the creation of a strong and defensible boundary between the allocation and the Green Belt. The precise form the boundary takes will be a matter for consideration at the planning application stage and will need to be approved by the Local Planning Authority at that time.

Duty to Co-operate

Main Issues:

Council's Response:

Suggested Modifications

1. The Council should revisit the issues of housing density across the whole district, and it should explore in depth the potential for use of brownfield and underutilised land

Council's Response:

1. Density is either based on recognised density multipliers or information provided by developers. For mixed use sites the capacities/densities are to be explored in the' Mixed Use Sites Capacity Review' to be undertaken by consultants on behalf of the Council and prior to the next set of hearings.
In order to identify the most sustainable sites a 'sequential' approach to housing allocations has been adopted that prioritises brownfield sites in the urban area. The NPPF/PPG requires sites to be deliverable or developable depending on where they are positioned in the housing trajectory. All sites have been viability tested with any brownfield sites meeting the required tests already included in the Local Plan. The evidence therefore precludes the allocation of further brownfield (previously developed) sites. No modification proposed.

Document Section: 5.3 Paragraph

Representations

Comment ID **HRU1441** Site ref (if applicable):

Person ID: **1125055** Name: **Mr John Logan** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

The Inspectors incisive Review of the draft Local Plan at Stage 1 has identified that the Employment Sites proposed are not matched byits Housing provision.The Authority has been given the opportunity to reflect on whether to proceed with its acknowledged ambitious Employment targets or reduce the targets to match its housing proposals. It has decided to press ahead with its Employment plans, with the laudable aimof generating more income. In doing so, it is now faced with the unenviable task of identifying other parcels of land to provide this extra housing supply. This will, of course, now result in scrutiny of the new sitesagainst the previous proposals and logically fosters the expectation that the new sites will have to be sourced from land within the Green Belt. In responding to the Inspector's Question, the approach taken to resolve this issue seems tobe a numerically based one, to just match the Employment numbers with the Housing numbers. Whilst this resolves one element of the Question - the numbers - it does nothing toaddress the more fundamental issue ofwhere the broad spatial mismatch occurred in the first instance. Given, that the primaryobjective of the Local Plan is to provide employment and housing sites that will endure until the next review- which of necessity calls for a spatially balanced District wide view - itcasts doubt on the quality of the initial proposals. In spatial terms, the overwhelmingly significant distribution of new housing is in the Brighouse area, with two urban extensions proposed. Whilst it is accepted that there is new employment together withnew housingnear one of the proposed urban extension sites at Clifton, the choice of site LP1451 as a second urban extension is not justified on a number of grounds - not justrelating to the employment/housing issue, but concerning wider and fundamental issues of sprawland merger. The selection of site LP1451 for development has focussed primarily on its proximity to the M62 and wishful thinking that Highways England will develop a new junction 24a - a joint District strategic venture - to also facilitate the Kirklees urban extension in Bradley. Focusing on the wider Kirklees/Calderdale District spatial employment/housing issues in this geographical area - and this is a statutory duty under the Duty to Cooperate - it should have been clear from the outset that great care was needed in this particular area to ensure that proposals were feasible and 'sound' in terms of Planning Policy. An early and proper strategic view of this geographical areawould have highlighted the inherent problemsaround the spatial distribution of employment and housing - and the inter-relation between the two - and resulted in site LP1451 being 'filtered'. In terms of the housing sites proposed tosatisfy - at least - the numerical element of the Inspector's Question, I was surprised to find that brownfield sites werenowproposed and would provide 288 properties. These sites should, of course, have been identified in theearly stagesto reduce the demand on the Green Belt, as dictated by Planning Policy.Identifying these sitesnow seriously undermines the credibility of the whole Local Plan process, suggests that the originalreview was superficial, and must substantiate the view that the initial plan was unsound. The

distribution of the remaining properties,sourced from greenfieldareas,is equally surprising in that the main sources are 61% in Elland, 21% in Northowram: with a paltry 11% in Halifax, by far the largest settlement. I acknowledge the statement that the Elland supply figures have been increased to support a new Elland Rail Station but this begs the question of why thisworthy initiativewas not included in the original draft - is it so new that the issue has arisen since the draft Plan was published? However, a closer examination of the proposed Elland sites shows that one site - LP1567 - has the capacity to provide 450 properties, was initially filtered and the Green Belt conclusion was 'That the site performs poorly when assessed against five Green Belt purposes'. This reinforces the comment that I have made in relation to the new brownfield sites. In conclusion, given that an exercise has been undertaken where all the previously filtered sites have been re-appraised, this was also an opportunity for the Authority to redress the significantspatial housing imbalance between Brighouse and Halifax, whilst at the same time addressing the overall District employment /housing imbalance - which is an opportunity missed. I acknowledge that amore in-depth exercise would have taken more time but would have provided a more robust draft Plan prior to enteringthe Second Stageof the Inspection Process.

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 **HRU1513** Site ref (if applicable):

Person ID: **1244055** Name: **Mr Andrew Wood** Organisation: **Consultant Planner CPRE West Yorkshire**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

In our response to the Publication Draft we noted (in commenting on the transport policies) that there were three aspects of the spatial strategy that we considered to be unsustainable: The spatial emphasis of new development to the east of Brighouse, on sites which are principally accessible by car, place significant additional demands on the highway network, and offer limited prospects for active travel; The abandonment of brownfield sites as a source of new land supply, which will increase the dispersal of development to peripheral sites and limit the scope for walkable, mixed-use redevelopments especially in Halifax; The road-upgrade emphasis of the strategic transport interventions in Policy IM1 (although non-road interventions are noted and welcome) which will provide temporary relief from congestion and induce additional road traffic. The proposed additional site allocations do nothing to address these problems. However, they do create several further problems: Bringing about the coalescence of Shelf

(Calderdale) and Buttershaw (Bradford) with sites LP1034, LP1035, LP1036 and LP1037; Causing a wholly unacceptable degree of harm to the landscape and to Green Belt function at Greetland with sites LP0026, LP0952, LP0177 and LP1625; and in Northowram with sites LP 0766, LP1044 and LP1523; Causing a greater proportion of new site allocations to be beyond reasonable walking distances of rail stations and town centres (with or without a new station at Elland). In CPRE's view it is clear that the justification of exceptional circumstances for the specific Green Belt changes needed to release these additional sites cannot be demonstrated. This is because: the resulting development will be unsustainable in terms of location and impact; the sites would not be needed if the wider spatial plan were sound, even at the higher housing number. The Publication Draft para 16.7 states that the average density of new-build developments, excluding those over 100dpha, was 30.65dph during the period 2011-17, and goes on to set 30dph as a minimum. In our representations to that draft, we restated our longstanding position that densities below 45dpha could not be considered sustainable, and densities below that should only be allowed exceptionally. Consequently we held that any sites not deemed suitable for at least 45dpha should not be allocated. In the light of the climate emergency ; which strengthens the evident need for walkable neighbourhoods, more efficient use of land and more efficient design of building envelopes, we are now inclined to revise upwards our preferred densities. It should also be noted that a number of award-winning low-rise housing schemes, such as Little Kelham in Sheffield and Goldsmith Street in Norwich, have achieved densities of 80dpha ; which is also the density typical of pre-20 th century neighbourhoods which have much better walkability than more recent housing. In our view, it is therefore not unreasonable to set a 'usual minimum' density of 60dpha. Whilst this will increase the number of sites deemed unsuitable for the expected densities, it should also have significant benefits for efficiency of land and for walkability. Working from the Publication Draft Table 6.2, if 9,418 homes were needed from new land allocations, at 30dpha this would require 314 hectares net. The Publication Draft identifies 413 hectares of proposed allocations, indicating a net-to-gross ratio of around 75%. Taking the new figure of 11,768, at 30dpha would require a gross land area of around 490ha. But at 45dpha it would require 327ha gross, ie 86ha less than the gross allocation in the Publication Draft. And at 60dpha, 11,768 dwellings would need 245ha, 168ha less than the gross allocation in the Publication Draft. In other words, if densities were pursued that were commensurate with achieving sustainable development patterns, then substantially fewer sites would be required. More specifically, the higher figure could potentially be delivered without allocating any of the additional sites, and also without the larger of the two Garden Suburb sites (LP1463). In our view, it is also likely that reinstating a meaningful approach to brownfield and windfall sites as a source of supply may well also obviate the need for LP1451, but we will return to these matters in our Examination hearing statements. Therefore we object to all the additional site allocations on the grounds that they are not necessary to deliver the housing requirement sustainably.

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

Duty to Co-operate Reason:

Suggested Modifications:

Set a 'usual minimum' density for new development at 60 dwellings per hectare net; Require developments below 60dpha to be specifically justified in terms of the type and mix of housing needed in the locality; Review all site allocations to filter out sites not deemed suitable for these densities; Review the windfall policy. Determine whether further/alternative site allocations are needed to support the revised approach.

Comments:

Additional Evidence Link:

Comment ID **HRU1555** Site ref (if applicable):

Person ID: **717690** Name: **Mr Jason Carlton** 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:

Majority of the additional sites still focused on South East Calderdale; this is significant because if these dwellings are built it will Focus the investment in one part of the borough, will not alleviate economic inequalities in Northern Parts of the borough. Focusing growth in South East Calderdale will reduce available financing for other parts of the district, reduce sustainable employment further up the valley (as businesses will be incentivised to move to SE Calderdale) and increase the risks of commuting into Brighouse. Focusing housing development near M62 will promote out-commuting particularly to locations along the strategic road network (including Leeds and Manchester) ; even with the planned Clifton Enterprise Zone and the net jobs gain of approximately 850 equivalent full-time positions, this is only a small percentage of the 4,000 plus dwellings that will be focused on the immediate areas of Brighouse and Rastrick There are no plans to build Junction 24a within the next eight years (even though Calderdale believes it would be 'desirable'). WYCA's recent Transport Fund budget [1] shows a total spend to date of just Â£40,000, and there is no planned spend between 2019/2020 and 2027/28. Neighbouring Kirklees has already scaled-back plans for traffic interventions at Cooper Bridge [2] from those promoted during their public examination. There will be increased pressure on M62 Junction 25, already taking expecting significant traffic growth from Kirklees developments in Bradley and Mirfield. We already know that signalisation of M62 J25 will not solve the estimated traffic congestion and that further interventions, as yet unspecified in the recent Infrastructure Development Plan, will be required. Calderdale has an excellent track-record returning empty dwellings into occupied use; this has already satisfied some of the local demand for housing. The location and timescale of site developments will impact on the deliverability of the Local Plan, irrespective of willing land-owners/agents/developers. There is no robust evidence of how deliverable in terms of build-out, over-supply of completed dwellings leading to depressed prices, stalled developments and blight; there is a lack of evidence to suggest the demand for such an increase in Calderdale's housing stock exists. Filtering of rejected sites. Lack of (willing) developer on board should not be a barrier to housing allocation policy. Deliverability of additional housing No credible evidence presented as to how the schemes will be financed Introduction of previously filtered brownfield sites The re-introduction of previously filtered brownfield sites raises issues about the original spatial allocation policy and is a missed opportunity to revisit the plans at this point [1] https://westyorkshire.moderngov.co.uk/documents/s14779/Item%206%20-%20Appendix%201.pdf [2] https://www.halifaxcourier.co.uk/news/traffic-and-travel/cooper-bridge-traffic-busting-scheme-scaled-back-planners-reveal-five-year-wait-950640 (accessed 23/02/20 16:02)

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

Duty to Co-operate Reason:

Suggested Modifications:

Amend the housing distribution, increasing allocations further up the valley, to reduce the risks of

concentrating district growth in South East Calderdale, or alternatively, reduce the housing allocations

Comments:

Additional Evidence Link:

Comment ID **HRU1699** Site ref (if applicable): **LP0177**

Person ID: **1244210** Name: **Mrs Rachel Carney** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

This objection relates to the potential release of land at site LP0177. Within the Council's Site Assessment Report ; Main Report, the site commentary concludes by stating -" Given the lack of fundamental constraints and the need to find additional sites to meet a higher housing need, the Council's preferred use for the site is a New Housing Site, with an indicative capacity of 200 units." My objection below will demonstrate that this assessment is incorrect and that there are fundamental constraints to development of the site. Green Belt Objection The current Unitary Development Plan which was adopted in 2006 and amended in 2009 allocates the proposed site as Green Belt. Both of these dates were prior to the publication of the National Planning Policy Framework (NPPF) and as such Planning Practice Guidance notes (PPG's) and Planning Policy Statements (PPS's) were the national planning policy basis for the plan. PPG2 ; Green Belts provided national planning policy on Green Belt and established that; The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open ; the most important attribute of Green Belts is their openness. Green Belts can shape patterns of urban development at sub-regional and regional scale, and help to ensure that development occurs in locations allocated in development plans. They help to protect the countryside, be it in agricultural, forestry or other use. They can assist in moving towards more sustainable patterns of urban development. PPG2 also outlined that there are five purposes of including land in Green Belts: 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. Section 2 of PPG2 provided policy guidance on the designation Of Green Belts and under 2.1 the permanence of Green Belt land was reiterated; 2.1 The essential characteristic of Green Belts is their permanence. Their protection must be maintained as far as can be seen ahead. Paragraph 2.6 then stated; Once the general extent of a Green Belt has been approved it should be altered only in exceptional circumstances. Paragraph 2.12 related to the safeguarding of land and stated; When local planning authorities prepare new or revised structure and local plans, any proposals affecting Green Belts should be related to a time-scale which is longer than that normally adopted for other aspects of the plan. They should satisfy themselves that Green Belt boundaries will not need to be altered at the end of the plan period. The wording of PPG2 clearly established that in designating Green Belts the Council should have been satisfied that the area should be retained as Green Belt unless there are exceptional circumstances. During the adoption of the UDP the Local Authority should also have been satisfied that Green Belt boundaries should

not have to be altered at the end of the plan period. This clearly means that if the UDP was a robust and sound plan the Green Belt areas designated should be retained in production of the new Local Plan. PPG's and PPS's were superseded by the National Planning Policy Framework (NPPF) in March 2012. The main thread running throughout the NPPF is sustainable development For plan-making this means under paragraph 11 that: a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change; b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless: the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. The principles behind Green Belt policy have been retained and reinforced in the NPPF and this is clearly demonstrate in paragraphs 133 and 134 The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence . Green Belt serves five purposes: a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Paragraph 136 then states; Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans. This guidance is very similar to that published in the PPG2 Calderdale Council's Green Belt review (available www.calderdale.gov.uk) designates the entire site as - “Most Sensitive Green Belt Parcels" yet the site assessment report fails to assess the value to Green Belt that the site currently provides with no assessment against Chapter 13 of the NPPF ; Protecting Green Belt land and specifically no assessment of value against paragraph 134. The other material considerations such as ecology and landscape, while connected to Green Belt, are separate factors with separate policies. The policy assessment of these matters should not be confused with appropriate and required assessment of Green Belt policy. Further to the above in respect of plan making the Local Planning Authority has a duty to demonstrate very special circumstances before considering removing land from the Green Belt. The Council have failed to do this as identified above and they have also failed to fully identify all suitable areas of brownfield land, of which there are a number of undeveloped sites in the area. I am told that the Council have removed a number of brownfield sites from their housing land register due to a lack of developer interest. This however is not a justifiable reason to open up green field or Green Belt sites and clearly if this is the position of the Council, there is no justification for developers to commit to developing more costly brownfield sites. The value of Green Belt is apparent in the way the NPPF and earlier government policies are written. The Council should not be considering release of these sites unless there are clear and evidenced very special circumstances. The Council have failed to demonstrate these and reallocation of this land from Green Belt would not accord with the NPPF. Flooding Calderdale is frequently in the national media due to flooding. Due to the natural topography of Calderdale, which comprises steep sloping hills and narrow valley's, flooding has always been a problem for communities in the area. However, with increased development of flood plains and the surrounding hillsides, alongside potential climate changes of increased rainfall associated with global warming, severe flooding episodes in the area appear to becoming more commonplace. The risks from flooding in Calderdale were recently identified by the Environment Agency in the following quote. Quote from the Environment Agency 12/2/20 Evening News, BBC Look North -“Unfortunately, the Calder valley is at unique flood risk. It's a very narrow steep sided valley and it doesn't take much to see flooding throughout the catchment right down

through many communities. We see rapid onset flooding; low onset flooding as well and quite a high risk to life."Adrian Gill, Environment Agency The NPPF requires that the planning system take full account of flood risk (para 148). Paragraph 149 states: Plans should take a proactive approach to mitigating to climate change, taking into account the long term implications for flood risk"¦Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts. Paragraph 155 then states: Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. Site LP1077 is located within the Environment Agency Flood Risk Zones 3a and 2 and is identified as being at medium and high risk from flooding. I lived immediately adjacent the site between the years 1987 and 2006 and my parents are still resident at that property. Since 1987 I have witnessed the site flood a number of times each year. Flooding is very common on this site and the gardens of some of the properties along Woodfield Drive also regularly flood. For those properties on Woodfield Drive, which don't experience regular flooding of their gardens and which face south towards the site and the Black Brook, it is common for the river, when in flood, to flow along their rear garden walls. Flooding of this field and other areas adjacent to the Black Brook would not be easily mitigated or prevented through the integration of sustainable urban drainage schemes (SUDS) required through any future development. This field is at particularly high risk of flooding due to the bend in the brook as it turns north. This bend means that any time that the brook breaches it banks it naturally choses the easiest and quickest course which is to cut the corner and flow directly across the field to the south of Woodfield Drive. Any increase in surface water flow to the brook will only serve to increase the frequency of these flood events, which themselves could only be prevented by harmful channeling of the brook. The area of site LP0177 that not immediately adjacent the brook, clearly does not experience the same flooding from the brook. However, the northern areas of the site are vitally important in providing a natural soakaway for water from the hillside of Greetland, which itself is full of natural springs and is already severely lacking in undeveloped areas to provide natural drainage. If anything, subject to land owner and agricultural constraints, the land should be improved with additional vegetation, i.e. tree planting, that would increase the natural water storage capacity of the land. Further to the above, any future development of this site would certainly flood unless significant and harmful flood alleviation schemes are put in place. My comments below are based on site being at high risk of flooding and after this I will address why flood alleviation schemes would not be suitable for the site. The field to the south of nos. 5-15 Woodfield Drive is located within the red line area but not within the indicative developable area as identified by the Council. The Council identifies in the Site Assessment Report that development of the site will require open space provision and the developers plan designates the field to the south of Woodfield Drive as Public Open Space. However I consider that this land would not provide suitable Public Open Space given the certainty of flooding. Under Paragraph 7.21 of the Council's UDP it is stated that -“ It is important that new open space is both usable, safe and integrated within the scheme as a part of a cohesive landscape structure."I appreciate that the above UPD Policy will be replaced with the adoption of the Council's Core Strategy. Nonetheless, any future policy and or policy guidance would need to provide similar provisions in ensuring safe and usable designation of open space. This paragraph from the UDP clearly demonstrates that use of this land for the public open space would not be suitable and would fail to comply with existing and future policies. The land would not be usable during frequent periods of flooding and members of the public using the land would not be safe from the risks of flooding. Additionally any landscaping and/or amenity features that may be required through provision of public open space would likely be destroyed by regular flooding of the site. Given the above I consider that the entire area of LP0177 that is within the designated flood risk areas is entirely unsuitable for development. Considering the rest of the site, as referenced above this presently provides a vital store for surface water drainage and also contains several springs, some of which are identified on the Environment Agency Flood Map. The Council's Site Mitigation Report identifies that any development would be required to include SUDS and Green Roof's (a form of SUDS) but the report fails to identify the important role this land currently provides in slowing down runoff to the Black Brook and subsequently

reducing flooding of the Black Brook and the River Calder, of which the Black Brook is a tributary. Notwithstanding the difficulties Council's are met with in trying to get large scale house builders to include wide scale SUDS and other measures into developments, the inclusion of SUDS would not mitigate 100% against the loss of these fields as natural drainage sources, nor would they account for the unknown impacts that would occur to natural springs within the site and the surrounding area. Development of this site will increase runoff to the Black Brook, which can only do one thing and that is increase flood risk and the frequency of flood events in the area. Mitigation of the Black Brook As identified above, development of the site would increase run off to the Black Brook and would in turn increase flood risk and the frequency of flood events in the area. The Council identify that, for ecological reasons, a minimum standoff of 10m will be required from the Black Brook and that maintenance and enhancement of the woodland margins will be required to provide screening. If the Council were to allow for development and the associated increase in surface water runoff, the only way to mitigate this would be through channeling of the Black Brook. This clearly would not allow for the ecological enhancements required and would cause certain ecological harm. This would also only serve to increase the flow rate of the Black Brook, particularly in periods of heavy rainfall, thus increasing flood risk further down stream of the Black Brook and River Calder. In the recent floods of February 2020 the vulnerability and risk of areas down stream was highlighted with the flooding of the playing fields at Heath Rugby Club (located off Stainland Road) which is a common event, but in which this instance resulted in a container belonging to a local running club being swept down the river and getting stuck at Elland Bridge. Subsequently this bridge had to be inspected for structural defects after only recently been rebuilt following damage that occurred during the Boxing Day Floods of 2015. Once the river level dropped slightly this same container was swept further downstream to Brighouse where it got stuck at another bridge and where more structural inspections for damage were required. Such events demonstrate the very dangerous power of water and the real risk to human life that flooding can present. To increase runoff to these rivers is entirely contrary to national planning policy within the NPPF and is also irresponsible. Ecology Chapter 15 of the NPPF requires that planning policies and decisions should contribute and enhance the natural and local environment The Council recognise that the corridor of the Black Brook provides habitat for a variety of species which includes European Protected Species and UK Biodiversity Protected Species. In considering the acceptability of development within the planning regime, in respect of European Protected Species, specific regard must be given to the Natural Environment and Rural Communities Act 2006 that requires that -"Every public authority must, in exercising its functions, have regard, so far as it is consistent with the proper exercise of breeding site would be an offence under the Conservation of Habitats and Species Regulations 2010 (the Regulations) unless and Natural England European Protected Species Licence is issued prior to the commencement of works or confirmation is received from Natural England that the development would not require such a licence. The Habitats Directive requires that member states establish a system of strict protection for European Protected Species, setting out the offences that may be committed. Derogations from this strict protection are only allowed in certain limited circumstances. When determining whether or not to grant a licence, Natural England must be satisfied that the following three tests have been met. Preserving public health or public safety or other imperative reasons of overriding public interest; That there is no satisfactory alternative, and The action will not be detrimental to maintaining the population of the species concerned at a favourable conservation status in its natural range. Clearly when considering land designation within the Local Plan the Council are not considering a detailed proposal and do not have the specific reports that would be submitted with an application for planning permission. Nonetheless, the Council are still under the requirements of the above and in the absence of a licence, are required by Regulation 9(3) of the Regulations to have regard to the requirements of the Habitats Directive and are required to consider whether there would be a reasonable prospect of a licence being granted by applying the three tests. In respect of the above consultation does not appear to have been undertaken with Natural England. Nor is their any demonstration that the re-allocation of the site would comply with the above. Furthermore, as detailed above there is no assessment in how the required flood mitigation would impact on the ecological value of the site. As is outlined above, the only method to prevent flooding of the

site would be through channeling of the Black Brook. Clearly this would be unacceptable and harmful for a number of reasons but one of the primary reasons within the site would be the devastating impact this would have on local wildlife. The local wildlife rely on this brook as their primary habitat, as is clearly recognised by the Council. I also suspect that the frequent and natural flooding of the site also contributes to the habitat provided and is part of the delicate ecosystem. Any alterations to this by development that would alter existing runoff patterns and the flow of local spring within to the river network could result in unprecedented harm to the local ecology, which, as identified above, includes protected species. The NPPF clearly requires development to contribute and enhance the natural and local environment and a requirement to enhance a corridor of habitat with no appropriate assessment of the impacts of the wider impacts of development of the site beyond the wildlife corridor. The Council have also failed to assess the impact of the introduction of non-physical disturbances to the wildlife and protected species in the area, such as noise, vibration, visual presence, human presence and light pollution, in combination with increased air pollution, given that the proposed development is in a disproportionately highly concentrated area along a condensed stretch of one road. This would likely have disastrous effects on the wildlife corridor, impacting significantly on its ecological value. Further to the above it is considered that the Council have been premature in concluding that development of the site would be acceptable in terms of ecology, subject to mitigation. As per the requirement of the NPPF chapter 15, the Council have failed to demonstrate that mitigation would enhance the natural and local environment. Loss of amenity of existing open space and impact on the public right of way: Paragraph 98 of the NPPF states that Planning policies and decisions should protect and enhance public rights of way and access. Paragraph 91 states that Planning policies should aim to achieve healthy, inclusive and safe places which: b) are safe and accessible so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion. c) enable and support healthy lifestyles"¦for example through the provision of safe and accessible green infrastructure"¦and layouts that encourage walking and cycling. The Site Assessment Report for LP0177 acknowledges the importance of the recreational value of the Black Brook area, and hence the public right of way that allows the community access to this area. However, the site report also assumes in the ecology assessment that there would be increased recreational pressure on the Black Brook which will require surfacing of the streamside path. In this respect the Council fails to understand two main factors: the popularity of the rights of way that run along the Black Brook and, the destruction of the rights of way as an amenity asset though development of the site and the surrounding area. The public rights of way and the surrounding fields are extremely well used recreational assets that are used by residents of Greetland and beyond. The reason this area is so well utilised is the amenity value currently provided by the open natural and agricultural setting. Retention of just a small corridor adjacent to the Black Brook would not retain this current environment and the large scale development of this site and those beyond would entirely alter the existing character of the area and the amenity value that it provides. While clearly any retained and improved footpaths would be used, it is naÃ¯ve to assume that these assets would and could be used for the same purpose and enjoyment as currently and for these reasons it is not a sound judgment to assume use of the assets would increase. The Council have also failed to recognise that a large portion of the community gains access to this amenity asset via the public right of way east of the Greetland Academy. If reallocation of this land is allowed and a subsequent residential development is constructed this would significantly harm the amenity value offered by this section of public right of way. The right of way would be enclosed by development which would reduce public visibility and arguably reduce the safety of users of the footpath, putting the public at greater risk of crime. No consultation with West Yorkshire Police Architectural Liaison Officer is included with the Site Assessment Report to address and make comment on any concerns in this regard. Within the Open Space section of the Site Assessment Report the Council again acknowledges that the site performs the function of a natural/semi-natural open space. It then however states that there are sufficient alternative natural/semi-natural area within the catchment of this site to meet the adopted standards. The Council however fails to acknowledge that beyond this site, development is planned for a significant distance up the valley of the Black Brook to the west. These sites are identified as LP0026, LP0952, LP1625. If reallocation of these sites is allowed and

subsequent development undertaken the accessibility of open space will no longer be within the walking distance of a large portion of the local community, particular those of limited mobility who will be severely affected should development of any one of these sites be permitted. In this respect it also appears that the Council have failed in their duties of considering The Equalities Act 2010 in ensuring accessible areas of open space for all members of the community. Paragraph 180 of the NPPF also states that Planning policies and decision should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment as well as the potential sensitivity of the sit or the wider area to impacts that could arise from the development. In doing so they should: b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized by their recreational and amenity value for this reason. Again it appears that the Council have failed to fully consider the implications of this development on the existing amenity assets in the area. As demonstrated by the diverse wildlife in the area the site, whilst under agricultural use, is relatively undisturbed, providing a vital wildlife corridor the peace and tranquillity of which enjoyed vastly by th local community. As highlighted in my ecology objection above, the introduction of non-physical disturbances to the wildlife and protected species in our area, such as noise, vibration, visual presence, human presence and light pollution, in combination with increased air pollution, given that the proposed development is in a disproportionately highly concentrated area along a condensed stretch of one road, would have disastrous effects on the wildlife corridor and the value it provides. In addition to the above Calderdale has been identified as a deprived council. The latest government figures show that Calderdale is in the top quarter of most deprived authorities in the country, and one very important aspect of this is the quality of residents' living space. If reallocation of this site is allowed there will be serious detrimental impact on the wellbeing of the residents in this one, small area of what has been classed as a deprived council. Calderdale needs to look towards improving the living areas of its residents, protecting valuable Green Belt land for Calderdale residents to escape to and walk along. This type of facility serves to protect and bolster mental health within the community. As stated on the Gov.UK website, "˜A new study has been published by Natural England which reviews the benefits and outcomes of approaches to green care for mental ill-health"¦ A report published today (9 February 2016) shows that taking part in nature-based activities helps people who are suffering from mental ill-health and can contribute to a reduction in levels of anxiety, stress, and depression.' At a time when mental health is arguably at crisis point, designated areas where individuals and community groups know they can visit are invaluable. Designated spaces like the popular amenity public right of way in Greetland, which runs alongside our precious wildlife corridor and Black Brook, can afford communities free and easily accessible facilities, facilities which the council can cheaply and effectively work into mental health schemes. The importance of this site is due to the amount of biodiversity of wildlife concentrated in this area. Further to the above the Council have failed to fully assess the impacts on the existing amenity provided by the public rights of way and the open space within the site. Based on the information available reallocation of the site would be contrary to policy in the NPPF and should not be supported. Highways The Site Assessment Report is severely lacking in the section that deals with local highway impacts, i.e. those outside of the motorway network. To most of the local community these local impacts are main consideration in regards highways, especially given the inability of the local highway network to deal with current traffic levels. Chapter 9 of the NPPF deals with Promoting sustainable transport and under paragraph 103 states that: The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offer a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision making. Paragraph 109 of the NPPF states that, "˜Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.' This site, along with other sites proposed for reallocation would all access onto Saddleworth Road which is one of the two main roads from

Greetland into West Vale. These two roads are used by not only the residents of Greetland but also those of Barkisland, Norland and Ripponden areas, particularly if residents from those areas are wishing to access the M62 motorway to travel in a easterly direction. Saddleworth Road is also used by a large volume of HGV's due to existing industrial sites in the area and accessibility to the motorway. Due to the existing volume of traffic along Saddleworth Road and Rochdale Road severe congestion in west vale occurs on a daily basis and has done for at least 25 years (probably longer). The Council have on several occasions attempted to improve traffic flow through west vale by minor changes to the traffic lights and the introduction of a right hand only lane on Rochdale Road. However these changes have only minimal impact and due to built constraints it is difficult to foresee how the situation could be improved. Other highway improvements into Halifax along A629 and B6112 will not improve traffic congestion in Greetland as residents of Greetland and the other mentioned areas will still need to travel on either Saddleworth of Rochdale Road before reaching these improvements. The Site Assessment Report identifies this site as being suitable for 200 houses and with the reallocation of other sites within the near vicinity, the total number of new homes proposed to access on Saddleworth Road is 600, thus resulting in a realistic figure of at least 1200 new cars within Greetland. The increase in cars, even when considering just this site, is significant and will undoubtedly result in further congestion within the area, with all the associated highway safety risks. When considering impacts on highway safety the location of the existing Greetland Academy (Saddleworth Road site) must be given consideration and it is already common to see cars from the West Vale junction with Stainland Road queuing past the school. This clearly presents a highway risk to the safety of children at the school but also presents a clear air quality risk due to the clear increases in air pollution that will be generated by increased traffic movements and queuing ; air quality addressed further below. As detailed above the Council are required to focus development on sustainable traffic locations. The Council figures provided within the Site Assessment Report clearly identifies that this site is not sustainable in this regard. The nearest bus stops to the site, which are located on Saddleworth Road are served by two buses every hour, one to Halifax and one to Huddersfield. Public Transport provision is better in West Vale but as identified, this is 2km from the site and not accessible to those with limited mobility. Residents in Greetland rely on private car ownership for day to day commuting as suitable public transport and local service provision does not allow for any other. If reallocation of this site was allowed there would clearly be a significant increase in car ownership and traffic movements in the area and this would result in significant congestion, highway safety risk and decreases in air quality in the area. Schools Paragraph 94 of the NPPF stares that "˜It is important that a sufficient

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 **HRU1702** Site ref (if applicable): **LP0862**

Person ID: **957983** Name: **Mr David Storrie** Organisation: **Planning Director David Storrie Planning**

Agent ID: **739959** Name: **Mr David Storrie** Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

We have been promoting this site for a residential allocation throughout the Local Plan process. Up until the Publication Draft Plan, it was supported by the Council. Meetings took place with the Council following the site being filtered. It was agreed that retaining the site as Green Belt being surrounded by the Garden Suburb was illogical but, given the Local Plan process, it would have to be put forward as a modification. The need to find more housing sites after the Stage 1 Hearings opened up an opportunity to bring the site forward. Unfortunately this was not taken up by the Council as it appears a Heritage Statement submitted in response to the Publication Draft Local Plan has not been assessed by the Council so it was not looked at. This has been brought to the attention of the Council. As a consequence the Council have failed to properly assess available sites in order to present appositively prepared plan. Calderdale Publication Draft Local Plan ; Housing requirement update and potential supply Proposed Housing site LP0862 ; The Gatehouse, Brighouse and Proposed Site Allocation LP1451 ; Land between Bradley Wood and Woodhouse Lane, Rastrick, Brighouse The Gatehouse (LP0862) We comment in respect of the above proposed allocation on behalf of the owners of The Gatehouse that is located on the north-western edge of the proposed Garden Suburb allocation (see above). The Gatehouse site was supported as a proposed housing allocation by the Council throughout the Local Plan process until being rejected at the final Publication Draft stage. The reason given being concerns about the impact on The Gatehouse that (without any analysis by the Council) is considered to be a non-designated Heritage Asset. The conclusion on the Council's original assessment promoting the site as a residential allocation is set out below followed by the rejection in the Publication Draft. 2015 Overall Assessment Summary This is a relatively flat greenfield site within the Green Belt but adjacent to the urban area. The site comprises the curtilage of 'The Grange'. It is also currently designated Wildlife Corridor in the RCUDP. It is Grade 3 in the Agricultural Land Classification. The site lies within the Mineral Safeguarding Area for both stone and coal. The site has good access to a range of services and facilities, including being within 400m of a bus stop with a service at least every 30 minutes, and less than 2km from Brighouse railway station. Regarding the Green Belt, the overall parcel within which the site is located performs strongly when assessed against the five green belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. There are no known ecological assets on the site. There is a very small proportion of the site that is at risk from surface water flooding, and any development proposal would need to be subject to a Flood Risk Assessment. There is no significant impact on the Strategic Highway Network. Access to the site could be tied in with development of the adjacent Urban Extension at Woodhouse. Localised widening of Shepherd Thorn Lane may be required. A Heritage Impact Assessment is likely as there is potential that both the house and its grounds is related to the arts and crafts movement - Potentially Edward Lutchens house with a Gertrude Jekyll garden. Taking into account the results of the sustainability appraisal for the site, development should incorporate green infrastructure on site to mitigate against the loss of a greenfield site, and the potential impacts on infiltration/surface water run off. Given the lack of significant constraints, the Council's preferred use for the site is a New Housing Site, with a capacity of 48 dwellings. Outcome New Housing Site (2015) 2017 Overall Assessment Summary This is a relatively flat greenfield site within the Green Belt but adjacent to the urban area. The site comprises the curtilage of 'The Grange'. It is also currently designated Wildlife Corridor in the RCUDP. It is Grade 3 in the Agricultural Land Classification. The site has good access to a range of services and facilities, including being within 400m of a bus stop with a service at least every 30 minutes, and less than 2km from Brighouse railway station. The site falls within Flood Zone 1, however due to the size and greenfield nature of the site, a Flood Risk Assessment would be required. The Council's Flooding and Drainage Section indicate a couple of drainage

issues reported in close proximity to the site which were resolved. However, due to the potential risk for increased surface water run-off, capacity building of existing drainage network and well planned site investigations are required. The site is developable subject to mitigating secured through green and blue infrastructure on site such as SuDS and green roofs to reduce the infiltration rate of precipitation as well as provide storage for storm water run-off. There is no significant impact on the Strategic Highway Network. Highways Development Management considers the site developable subject to the potential localised widening of Shepherd Thorn Lane. Access to the site could also be tied in with development of the adjacent Urban Extension at Woodhouse. West Yorkshire Ecology has not identified any ecological assets on the site. The Council's Conservation Section (Ecology) considers the site developable, however, has requested a Bat Survey and Amphibian Survey to identify any constraints and mitigation measures, as well as requiring the retention of the mature trees on site. Although this site is not a designated the site consists of a well preserved example of a large detached Arts and Crafts villa house and its formal gardens, late 19th to early 20th century. The house is shown on 1907 OS map. The asset is enhanced by the wider rural setting. However, the house and gardens are a well-defined unit with mature planting to boundary and the character of the immediate setting is fairly self-contained by the boundary of the gardens. The Historic Impact Assessment recommends the site is not allocated on the grounds of potential historic interest and contribution to the character of the area. The site lies within the Mineral Safeguarding Area for both stone and coal. Therefore, 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. Regarding the Green Belt, the overall parcel within which the site is located performs strongly when assessed against the five green belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. Given the site is poorly scoring and evidence that the allocation of this site would have a significant detrimental impact on a non-designated heritage asset, it is recommended that this site is not allocated within the Local Plan. Outcome Filtered (2017) Following the above, a dialogue continued with the Council and a Heritage Statement was submitted to support objections to the site being filtered in the Publication Draft Plan. Discussions have also taken place with the promoters of the adjacent Garden Suburb. They are supportive of the site being allocated for housing either on its own or as part of the Garden Suburb and made representations in support on the Publication Draft Local Plan. Further meetings took place with the Council who were sympathetic to our case but felt that it was too late in the process to reconsult on changing the Publication Draft Plan and suggested that it might be best to deal with it as a modification at the Public Examination stage. At the meeting the Council Officer agreed that it did not make sense to retain the site in the Green Belt, surrounded by development. It would be difficult to justify as a defensible boundary meeting any of the purposes of the Green Belt. Following the Inspector's comments at the Stage 1 Hearings, there would appear to have been an opportunity to rectify matters and put forward the site as an additional Housing site. To our concern, it has not been picked up by the Council in this consultation. We have taken this up with the Council who have responded as follows: - â€˜As I recall your site was filtered at the time of publication due to the heritage issue. I think that the additional sites were identified in advance us meeting to talk about the heritage issues last year ; the consultation was delayed due to the General Election and then Christmas, resulting in a significant gap between the decision point and the consultation period.' Richard Seaman- Corporate Lead ; Planning From these comments it would appear that we are once again being denied by the process rather than proper assessment of the site. Notwithstanding the fact that we submitted a Heritage Statement in our 2017 submission to the Publication Draft Local Plan, it became apparent through recent dialogue with the Council's Conservation Officer that this had not bee seen. Following further engagement this has now been done and the following comments received that do not object to the principle of residential development of the site on heritage grounds (subject to a satisfactory layout). Thank you for your email in relation to the proposed Local Plan site at The Gatehouse, Rastrick and the accompanying Heritage Statement providing further information into the history of the site. The Heritage Statement provides an understanding of the historic and development of the site and I agree with assessment of significance of The Gatehouse as a non-designated asset of local significance. It is interesting to note the

way the gardens have developed over time from 1940s onwards and that the positive contribution they make to the aesthetic value of the Gatehouse has been acknowledged. It may be however, that how this positive contribution relates to the ability to appreciate the significance of the asset through the setting it creates, is perhaps slightly understated. Historic Environment Good Practice Advice in Planning Note 3 advises that the importance of setting, and therefore the degree of protection it is offered in planning decisions, depends entirely on the contribution it makes to the significance of the heritage asset or to the ability to appreciate that significance. Settings change over time and whilst settings which closely resemble the setting at the time the asset was constructed are likely to contribute particularly strongly to significance, settings which have changed may also themselves enhance significance. Many heritage assets have settings that have been designed to enhance their presence and visual interest, such as landscaped gardens. The gardens and the way they have been designed and developed over the years complement the principal building and are integral to the character and appeal of the asset, which should be considered as one entity. Whilst they were not designed as a â€˜set piece', the relative completeness of house and garden and their contribution to the character of the site, adds to the overall significance. It is however acknowledged and agreed that whilst the site can certainly be considered to be a non-designated heritage asset of some quality, it is of local rather than national significance and thus treated proportionately. Section 16 of the NPPF acknowledges that all heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. The LPA must take into account the impact of a proposal on a heritage assets, including development affecting the setting, to avoid or minimise any conflict between the asset's conservation and any aspect of the proposal. It is recognised that any assessment in relation to a proposal will be proportionate to the importance of the asset and the impact of the proposal. NPPF para 197 acknowledges that a balanced judgement will be required in regard to the scale of any harm or loss and the significance of the asset. The Heritage Statement recognises that development within the gardens of the Gatehouse will cause harm to the significance of the asset through changes to its setting that will affect the character and appearance of the asset and its contribution to the character of the area. Nevertheless, for this site, the balance of harm in relation to any potential development has yet to be determined. The Heritage Impact Assessment 2018 considered that a housing allocation of the entire site would cause major harm to the significance of the asset. The Heritage Statement provided indicates a potential development which may differ from this. Important factors to consider would be the potential layout of any access road and development, taking into consideration the contribution that the formal gardens, boundary walls and mature trees make to the setting and appearance of the principal building; and whether the site could accommodate any housing in an area that would minimise the impact on the asset. I have no further information and therefore cannot provide comment on future proposals, at the moment. In order to move forward are you able to submit a sketch scheme of a proposed layout that takes into consideration the above? I would be happy to provide further advice on whether a suggested concept design could allow for a development we could find acceptable, based on the requirements of the NPPF laid out above and a balancing of the harm to the asset, its significance and contribution to its setting, against the public benefits of the proposal. I hope the above comments are helpful to you. If you have any queries, please do not hesitate to contact me. Kind regards, Lauren Clarkson Lauren Clarkson Conservation Officer Calderdale MBC Concluding comments Given the above we request that LP0862 ; The Gatehouse, Brighouse is identified as a housing allocation in the Publication Draft Local Plan for consideration at the Public Examination, or the site is removed from the Green Belt. If it cannot be dealt with in this manner as part of this consultation it should be supported by the Council as a Modification where the site is removed from the Green Belt. As it stands, the site would be a small island of Green Belt surrounded by development (see below). We fail to see how this would satisfy the purpose of the Green Belt. The Gatehouse site Calderdale Publication Draft Local Plan ; Housing requirement update and potential supply Proposed Housing site LP0862 ; The Gatehouse, Brighouse and Proposed Site Allocation LP1451 ; Land between Bradley Wood and Woodhouse Lane, Rastrick, Brighouse The Gatehouse (LP0862) We comment in respect of the above proposed allocation on behalf of the owners of The Gatehouse that is located on the north-western edge of the proposed Garden Suburb allocation

(see above). The Gatehouse site was supported as a proposed housing allocation by the Council throughout the Local Plan process until being rejected at the final Publication Draft stage. The reason given being concerns about the impact on The Gatehouse that (without any analysis by the Council) is considered to be a non-designated Heritage Asset. The conclusion on the Council's original assessment promoting the site as a residential allocation is set out below followed by the rejection in the Publication Draft. 2015 Overall Assessment Summary This is a relatively flat greenfield site within the Green Belt but adjacent to the urban area. The site comprises the curtilage of 'The Grange'. It is also currently designated Wildlife Corridor in the RCUDP. It is Grade 3 in the Agricultural Land Classification. The site lies within the Mineral Safeguarding Area for both stone and coal. The site has good access to a range of services and facilities, including being within 400m of a bus stop with a service at least every 30 minutes, and less than 2km from Brighouse railway station. Regarding the Green Belt, the overall parcel within which the site is located performs strongly when assessed against the five green belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. There are no known ecological assets on the site. There is a very small proportion of the site that is at risk from surface water flooding, and any development proposal would need to be subject to a Flood Risk Assessment. There is no significant impact on the Strategic Highway Network. Access to the site could be tied in with development of the adjacent Urban Extension at Woodhouse. Localised widening of Shepherd Thorn Lane may be required. A Heritage Impact Assessment is likely as there is potential that both the house and its grounds is related to the arts and crafts movement - Potentially Edward Lutchens house with a Gertrude Jekyll garden. Taking into account the results of the sustainability appraisal for the site, development should incorporate green infrastructure on site to mitigate against the loss of a greenfield site, and the potential impacts on infiltration/surface water run off. Given the lack of significant constraints, the Council's preferred use for the site is a New Housing Site, with a capacity of 48 dwellings. Outcome New Housing Site (2015) 2017 Overall Assessment Summary This is a relatively flat greenfield site within the Green Belt but adjacent to the urban area. The site comprises the curtilage of 'The Grange'. It is also currently designated Wildlife Corridor in the RCUDP. It is Grade 3 in the Agricultural Land Classification. The site has good access to a range of services and facilities, including being within 400m of a bus stop with a service at least every 30 minutes, and less than 2km from Brighouse railway station. The site falls within Flood Zone 1, however due to the size and greenfield nature of the site, a Flood Risk Assessment would be required. The Council's Flooding and Drainage Section indicate a couple of drainage issues reported in close proximity to the site which were resolved. However, due to the potential risk for increased surface water run-off, capacity building of existing drainage network and well planned site investigations are required. The site is developable subject to mitigating secured through green and blue infrastructure on site such as SuDS and green roofs to reduce the infiltration rate of precipitation as well as provide storage for storm water run-off. There is no significant impact on the Strategic Highway Network. Highways Development Management considers the site developable subject to the potential localised widening of Shepherd Thorn Lane. Access to the site could also be tied in with development of the adjacent Urban Extension at Woodhouse. West Yorkshire Ecology has not identified any ecological assets on the site. The Council's Conservation Section (Ecology) considers the site developable, however, has requested a Bat Survey and Amphibian Survey to identify any constraints and mitigation measures, as well as requiring the retention of the mature trees on site. Although this site is not a designated the site consists of a well preserved example of a large detached Arts and Crafts villa house and its formal gardens, late 19th to early 20th century. The house is shown on 1907 OS map. The asset is enhanced by the wider rural setting. However, the house and gardens are a well-defined unit with mature planting to boundary and the character of the immediate setting is fairly self-contained by the boundary of the gardens. The Historic Impact Assessment recommends the site is not allocated on the grounds of potential historic interest and contribution to the character of the area. The site lies within the Mineral Safeguarding Area for both stone and coal. Therefore, 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. Regarding the Green Belt, the overall parcel within which the site is located performs strongly when assessed against the five green belt

purposes, and when assessing the revised boundary of the specific site, it also performs strongly. Given the site is poorly scoring and evidence that the allocation of this site would have a significant detrimental impact on a non-designated heritage asset, it is recommended that this site is not allocated within the Local Plan. Outcome Filtered (2017) Following the above, a dialogue continued with the Council and a Heritage Statement was submitted to support objections to the site being filtered in the Publication Draft Plan. Discussions have also taken place with the promoters of the adjacent Garden Suburb. They are supportive of the site being allocated for housing either on its own or as part of the Garden Suburb and made representations in support on the Publication Draft Local Plan. Further meetings took place with the Council who were sympathetic to our case but felt that it was too late in the process to reconsult on changing the Publication Draft Plan and suggested that it might be best to deal with it as a modification at the Public Examination stage. At the meeting the Council Officer agreed that it did not make sense to retain the site in the Green Belt, surrounded by development. It would be difficult to justify as a defensible boundary meeting any of the purposes of the Green Belt. Following the Inspector's comments at the Stage 1 Hearings, there would appear to have been an opportunity to rectify matters and put forward the site as an additional Housing site. To our concern, it has not been picked up by the Council in this consultation. We have taken this up with the Council who have responded as follows: - â€˜As I recall your site was filtered at the time of publication due to the heritage issue. I think that the additional sites were identified in advance us meeting to talk about the heritage issues last year ; the consultation was delayed due to the General Election and then Christmas, resulting in a significant gap between the decision point and the consultation period.' Richard Seaman- Corporate Lead ; Planning From these comments it would appear that we are once again being denied by the process rather than proper assessment of the site. Notwithstanding the fact that we submitted a Heritage Statement in our 2017 submission to the Publication Draft Local Plan, it became apparent through recent dialogue with the Council's Conservation Officer that this had not bee seen. Following further engagement this has now been done and the following comments received that do not object to the principle of residential development of the site on heritage grounds (subject to a satisfactory layout). Thank you for your email in relation to the proposed Local Plan site at The Gatehouse, Rastrick and the accompanying Heritage Statement providing further information into the history of the site. The Heritage Statement provides an understanding of the historic and development of the site and I agree with assessment of significance of The Gatehouse as a non-designated asset of local significance. It is interesting to note the way the gardens have developed over time from 1940s onwards and that the positive contribution they make to the aesthetic value of the Gatehouse has been acknowledged. It may be however, that how this positive contribution relates to the ability to appreciate the significance of the asset through the setting it creates, is perhaps slightly understated. Historic Environment Good Practice Advice in Planning Note 3 advises that the importance of setting, and therefore the degree of protection it is offered in planning decisions, depends entirely on the contribution it makes to the significance of the heritage asset or to the ability to appreciate that significance. Settings change over time and whilst settings which closely resemble the setting at the time the asset was constructed are likely to contribute particularly strongly to significance, settings which have changed may also themselves enhance significance. Many heritage assets have settings that have been designed to enhance their presence and visual interest, such as landscaped gardens. The gardens and the way they have been designed and developed over the years complement the principal building and are integral to the character and appeal of the asset, which should be considered as one entity. Whilst they were not designed as a â€˜set piece', the relative completeness of house and garden and their contribution to the character of the site, adds to the overall significance. It is however acknowledged and agreed that whilst the site can certainly be considered to be a non-designated heritage asset of some quality, it is of local rather than national significance and thus treated proportionately. Section 16 of the NPPF acknowledges that all heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. The LPA must take into account the impact of a proposal on a heritage assets, including development affecting the setting, to avoid or minimise any conflict between the asset's conservation and any aspect of the proposal. It is recognised that any assessment in relation to a

proposal will be proportionate to the importance of the asset and the impact of the proposal. NPPF para 197 acknowledges that a balanced judgement will be required in regard to the scale of any harm or loss and the significance of the asset. The Heritage Statement recognises that development within the gardens of the Gatehouse will cause harm to the significance of the asset through changes to its setting that will affect the character and appearance of the asset and its contribution to the character of the area. Nevertheless, for this site, the balance of harm in relation to any potential development has yet to be determined. The Heritage Impact Assessment 2018 considered that a housing allocation of the entire site would cause major harm to the significance of the asset. The Heritage Statement provided indicates a potential development which may differ from this. Important factors to consider would be the potential layout of any access road and development, taking into consideration the contribution that the formal gardens, boundary walls and mature trees make to the setting and appearance of the principal building; and whether the site could accommodate any housing in an area that would minimise the impact on the asset. I have no further information and therefore cannot provide comment on future proposals, at the moment. In order to move forward are you able to submit a sketch scheme of a proposed layout that takes into consideration the above? I would be happy to provide further advice on whether a suggested concept design could allow for a development we could find acceptable, based on the requirements of the NPPF laid out above and a balancing of the harm to the asset, its significance and contribution to its setting, against the public benefits of the proposal. I hope the above comments are helpful to you. If you have any queries, please do not hesitate to contact me. Kind regards, Lauren Clarkson Lauren Clarkson Conservation Officer Calderdale MBC Concluding comments Given the above we request that LP0862 ; The Gatehouse, Brighouse is identified as a housing allocation in the Publication Draft Local Plan for consideration at the Public Examination, or the site is removed from the Green Belt. If it cannot be dealt with in this manner as part of this consultation it should be supported by the Council as a Modification where the site is removed from the Green Belt. As it stands, the site would be a small island of Green Belt surrounded by development (see below). We fail to see how this would satisfy the purpose of the Green Belt. The Gatehouse site Calderdale Publication Draft Local Plan ; Housing requirement update and potential supply Proposed Housing site LP0862 ; The Gatehouse, Brighouse and Proposed Site Allocation LP1451 ; Land between Bradley Wood and Woodhouse Lane, Rastrick, Brighouse The Gatehouse (LP0862) We comment in respect of the above proposed allocation on behalf of the owners of The Gatehouse that is located on the north-western edge of the proposed Garden Suburb allocation (see above). The Gatehouse site was supported as a proposed housing allocation by the Council throughout the Local Plan process until being rejected at the final Publication Draft stage. The reason given being concerns about the impact on The Gatehouse that (without any analysis by the Council) is considered to be a non-designated Heritage Asset. The conclusion on the Council's original assessment promoting the site as a residential allocation is set out below followed by the rejection in the Publication Draft. 2015 Overall Assessment Summary This is a relatively flat greenfield site within the Green Belt but adjacent to the urban area. The site comprises the curtilage of 'The Grange'. It is also currently designated Wildlife Corridor in the RCUDP. It is Grade 3 in the Agricultural Land Classification. The site lies within the Mineral Safeguarding Area for both stone and coal. The site has good access to a range of services and facilities, including being within 400m of a bus stop with a service at least every 30 minutes, and less than 2km from Brighouse railway station. Regarding the Green Belt, the overall parcel within which the site is located performs strongly when assessed against the five green belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. There are no known ecological assets on the site. There is a very small proportion of the site that is at risk from surface water flooding, and any development proposal would need to be subject to a Flood Risk Assessment. There is no significant impact on the Strategic Highway Network. Access to the site could be tied in with development of the adjacent Urban Extension at Woodhouse. Localised widening of Shepherd Thorn Lane may be required. A Heritage Impact Assessment is likely as there is potential that both the house and its grounds is related to the arts and crafts movement - Potentially Edward Lutchens house with a Gertrude Jekyll garden. Taking into account the results of the sustainability appraisal for the site, development should incorporate green infrastructure on site to mitigate against the loss of a

greenfield site, and the potential impacts on infiltration/surface water run off. Given the lack of significant constraints, the Council's preferred use for the site is a New Housing Site, with a capacity of 48 dwellings. Outcome New Housing Site (2015) 2017 Overall Assessment Summary This is a relatively flat greenfield site within the Green Belt but adjacent to the urban area. The site comprises the curtilage of 'The Grange'. It is also currently designated Wildlife Corridor in the RCUDP. It is Grade 3 in the Agricultural Land Classification. The site has good access to a range of services and facilities, including being within 400m of a bus stop with a service at least every 30 minutes, and less than 2km from Brighouse railway station. The site falls within Flood Zone 1, however due to the size and greenfield nature of the site, a Flood Risk Assessment would be required. The Council's Flooding and Drainage Section indicate a couple of drainage issues reported in close proximity to the site which were resolved. However, due to the potential risk for increased surface water run-off, capacity building of existing drainage network and well planned site investigations are required. The site is developable subject to mitigating secured through green and blue infrastructure on site such as SuDS and green roofs to reduce the infiltration rate of precipitation as well as provide storage for storm water run-off. There is no significant impact on the Strategic Highway Network. Highways Development Management considers the site developable subject to the potential localised widening of Shepherd Thorn Lane. Access to the site could also be tied in with development of the adjacent Urban Extension at Woodhouse. West Yorkshire Ecology has not identified any ecological assets on the site. The Council's Conservation Section (Ecology) considers the site developable, however, has requested a Bat Survey and Amphibian Survey to identify any constraints and mitigation measures, as well as requiring the retention of the mature trees on site. Although this site is not a designated the site consists

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 **HRU1841** Site ref (if applicable):

Person ID: **1182803** Name: **Miss Sally Turgoose** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

I support building on brown field sites and feel this should be an absolute priority to protect our already threatened countryside. In that respect developing the site at Millroyd Street where the 200 new houses are proposed seems like a positive step but the points above about infrastructure within Brighouse are still very relevant. It also has some existing businesses such as Rokt and Millers Bar who have been working

hard to develop and bring business to the area and I would want these to be protected. Also, as has been demonstrated recently it is subject to flooding, in fact, recent events have shown the overall threat that flooding poses in Brighouse. The proposed Garden Suburbs particularly the one at Woodhouse will increase the flood threat further, as what I suspect will happen is that water that would previously have been absorbed into the agricultural land will instead run downhill into the town centre and increase the flood threat. My other challenge linked to this is to ask if there are other brown field sites that should be considered in Calderdale and which have been ignored because of the relative ease of building on a blank canvas that the countryside offers and which I strongly object to? I am unsure what sites have been considered and rejected.

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

Duty to Co-operate Reason:

Suggested Modifications:

I support the development of brownfield sites over green field so in this respect and with due consideration to existing businesses, this is a better proposal particularly if it reduces the need to build on green belt land at the Woodhouse Garden Suburb (LP1451) but infrastructure issues need to be considered as the area proposed is a significant traffic bottleneck.

Comments:

Additional Evidence Link:

Comment ID **HRU2118** Site ref (if applicable):

Person ID: **1139521** Name: **Cllr Sophie Whittaker** Organisation: **Councillor**

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:

Section 5.3 & 7 I object to proposed site LP0573 (Millroyd Street) for an additional 200 new dwellings. Many of the reasons stated in the previous two sections of my comments apply to this site, but namely: The site would add to overdevelopment in the area. It would aggravate existing issues with traffic volumes and movement around the Town Centre and roads linked between Brighouse and Rastrick. Mill Royd Street is a bottleneck as it is and further congestion would add to ongoing traffic issues on Briggate and Mill Royd Street leading on to Huddersfield Road. There would be a loss of public parking, which is also used to serve neighbouring businesses such as the popular and high contributor to the local economy, Rokt, and public house and restaurant, Millers. Both these businesses attract visitors near and far by providing valuable and, particularly in the case of Rokt, unique facilities which make Brighouse a distinctive place to visit. There is also no mention or indication of the impact this development would have on these businesses, nor the businesses located in/on Mill Royd Mill. It is in a high flood risk area with further development of this site increasing this risk in and around the Town Centre vicinity. The impact on wildlife along the river and

canal needs to be carefully assessed due to the wider and potentially damaging impact further along the river/canal channels.

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 **HRU2186** Site ref (if applicable):

Person ID: **1118404** Name: **Mr Andy Speck** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

My objections and comments are detailed below. Sections 4, 5.3 and 7. Congestion resulting from an increased population not working in Brighouse. The majority of the residents for the 5000 new houses will not be employed in Brighouse and therefore will be commuting, putting a significant pressure on the existing road and rail infrastructure, both of which are at capacity. Therefore congestion and pollution will increase, contradicting the councils climate change and environment policies and objectives. For example, most days of the week, including Saturdays, the queue on Huddersfield road is back into Kirklees. The noise and emissions is significant, even the move to electrification won't help as there are significant trucks and buses were electrification isn't an option. Green belt spaces allow for air movement and distribution and dilution of fumes. Building houses and roads on green belt land not only increases exhaust fumes from the vehicles accessing these houses but also reduces air movement and dilution of fumes , meaning both existing residents and new residents will be subjected to poorer air quality with the associated detrimental impact on health. Retaining green belt land for Brighouse residents will ensure a healthy population and prevent the loss of habitat and valuable green space. Policy on Climate Change. Building on green belt land reduces the available vegetation that captures CO2. This appears to be at odds with the councils stated policy on Climate Change. Brown field sites such as Milroyd Street are better options for house building. Flood risk. The flood risk in Brighouse, recently tested and found wanting, is a major concern to the region. Converting a large area of green belt land such as the Woodhouse Garden Suburb into roads , houses and driveways will reduce the ability of the land to soak up water and is highly likely to increase the volume and flow of water draining into the canal and River Calder in Brighouse town centre , increasing the flood risk. Also once the flood defences have been completed in Hebden Bridge and Mytholmroyd this could also move the flood risk further down the Calder Valley into Brighouse. Limiting building to brown field land should be the Council's strategy. Whilst I agree that Brighouse should accommodate a degree of increased housing , the amount proposed is totally disproportionate to the size of the town and its infrastructure ,

will add to the already unacceptable congestion on all main roads , will worsen air quality for its residents and increase flood risk. The council should reduce the number of houses planned to be built in Brighouse and allocate in more appropriate areas of Calderdale. The housing in Brighouse should be limited to brownfield sites and not green belt land such as the Woodhouse Garden Suburb. This will reduce the impact on air quality , congestion and flooding and make Brighouse a more pleasant place to live.

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 **HRU2232** Site ref (if applicable):

Person ID: **1181961** Name: **Mrs Julie Bullen** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

See attached

Do you consider the plan to be Sound?:

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/5635148

Comment ID **HRU2239** Site ref (if applicable):

Person ID: **1184942** Name: **Mr Mark Bullen** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

See attached

Do you consider the plan to be Sound?:

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/5635184

Comment ID **HRU2344** Site ref (if applicable):

Person ID: **1246930** Name: **Woodhouse Residents Association** Organisation: **Woodhouse Residents Association**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

See attachment

Do you consider the plan to be Sound?:

Sound Reason:

See attachment

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5635134 ; http://calderdale-consult.objective.co.uk/file/5635135 ; http://calderdale-consult.objective.co.uk/file/5635136

Comment ID **HRU843** Site ref (if applicable):

Person ID: **1241652** Name: **R Graham Maslen** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

In the Paper, Potential Sites Considered and Rejected there are 21 sites listed which were rejected. All of these sites are designated Green Belt. Of these 19 (90%) did not have a developer willing to undertake a development on the land. The Council listed five criteria which would influence the selection of additional sites. They are set out below. 1. Need to minimise further release of Green Belt around Brighouse given the high level of release already proposed here; 2. Spatial distribution reflecting already high proportion of development in South East Calderdale and the relative lack of allocations in the west of the district; 3. Reflecting the agreed delivery of a new Elland station through increased levels of development in and around Elland; 4. The need to demonstrate housing development is achievable with evidence land owners are willing to develop and/orwhere agents/developers are actively promoting a site; 5. Restricting development close to Hipperholme crossroads (known as the 'Hipperholme stand-off') following confirmation from the Council's Highways and Transportation Service that this approach should be retained. The evidence would suggest that criteria 4 was the most common factor in rejecting a site. Criteria 2 identifies the lack of allocations in the west. It could have also cited the lack of allocations in the north of the district. It is the attraction of the M62 to developers which influenced the selection of sites. Given the biased nature of the criteria it was inevitable that sites in Greetland would be selected. On this basis the additional sites were not positively prepared or justified.

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

Duty to Co-operate Reason:

Suggested Modifications:

The Green Belt sites identified for housing in Greetland should remain as Green Belt and not be developed (LP0026, LP0177, LP0952 and LP1625).

Comments:

Additional Evidence Link:

Main Issues and Council Response

Legal Compliance

Main Issues:

Council's Response:

Test of Soundness

Main Issues:

1. Assessment criteria for selection of additional sites is flawed.

2. Identifying brownfield sites at this stage undermines the Local Plan process.

3. The opportunity to redress the spatial imbalance between Brighouse and Halifax has been missed.

4. Object to all additional site allocations as they are not required to deliver the housing requirement sustainably. Densities on all sites should be increased.

5. The majority of additional site allocations are still focused on SE Calderdale, resulting in out commuting to locations along the strategic road network, economic disparities and loss of funding between this part and the rest of the borough, and cumulative impacts with development in Kirklees.

6. Location and timescales of developments will impact on deliverability of the Plan. There is a lack of evidence to suggest the demand for such an increase in housing stock exists.

7. No evidence as to how additional housing schemes will be financed.

8. The Council have failed to properly assess available sites in order to present a positively prepared plan.

Council's Response:

1. Document EV 51.1 Site Allocations Assessment Methodology - Publication Draft (2018) details the process the Council has followed in relation to the site assessment process. The document outlines the various stages of assessment from initial site identification to the implementation of the Sequential Approach.
All site assessments have been carried out in a consistent manner.

2. Two brownfield sites, which were previously filtered due to flooding have been identified for allocation at this stage because subsequent work demonstrates the Exception Test for allocation can be met.

3. This consultation concerns the additional sites to meet the increased housing requirement. For the Plan's overall approach to distribution see EV 51.1 (Site Allocations Assessment Methodology – Publication Draft, 2018). A further document is in preparation to explain site selection in the revisions document (CC39). It is notable that the additional housing allocations are in other parts of the district (than Brighouse). The physical constraints in the Upper Valley area mitigate against substantive allocations in this area.

4. The revised housing requirement is to be partially met through an increase in densities on some of the mixed use sites. However, additional allocations are required to meet the revised housing requirement.

5. This consultation concerns the additional sites to meet the increased housing requirement. For the Plan's overall approach to distribution see EV 51.1 (Site Allocations Assessment Methodology – Publication Draft, 2018). A further document is in preparation to explain site selection in the revisions document (CC39). It is notable that the additional housing allocations are in other parts of the district (than Brighouse). The physical constraints in the Upper Valley area mitigate against substantive allocations in this

area.

6. See CC21 – Modelling the economic implications of the proposed housing requirement.

7. The Council has assessed the deliverability and viability of all sites put forward within the local plan. All sites are considered to be available, deliverable and viable.

8. All sites assessments have been carried out in a consistent manner following the Site Allocations Assessment Methodology Statement, Publication Draft 2018 (EV51.1). All sites are considered to be available, deliverable and viable.

Duty to Co-operate

Main Issues:

Council's Response:

Suggested Modifications

1. Set a 'usual minimum' density for new development at 60 dwellings per hectare net

2. Require developments below 60dpha to be specifically justified in terms of the type and mix of housing needed in the locality

3. Review all site allocations to filter out sites not deemed suitable for these densities

4. Review the windfall policy.

5. Determine whether further/alternative site allocations are needed to support the revised approach.

6. Amend the housing distribution, increasing allocations further up the valley, to reduce the risks of concentrating district growth in South East Calderdale, or alternatively, reduce the housing allocations

Council's Response:

1. The densities are either based on agreed density multipliers based on site location or information provided by developers (this is not necessarily definitive). This more refined approach is more appropriate than a single density multiplier and reflects the approach taken in the SHLAA and site assessment methodology. No modification proposed.

2. The densities are either based on agreed density multipliers based on site location or information provided by developers (this is not necessarily definitive). This more refined approach is more appropriate than a single density multiplier and reflects the approach taken in the SHLAA and site assessment methodology. No modification proposed.

3. The densities are either based on agreed density multipliers based on site location or information provided by developers (this is not necessarily definitive). This more refined approach is more appropriate than a single density multiplier and reflects the approach taken in the SHLAA and site assessment methodology. No modification proposed.

4.The approach to windfalls is set out in the Housing Technical Paper and was examined at the stage 1

hearings. Subject to the Inspector's conclusions the Council does not consider a review necessary although windfalls will continue to be monitored. No modification proposed.

5. The updated Housing Technical Paper demonstrates that further allocations are not required whilst the site selection process has led to the most suitable sites being allocated. No modification is therefore proposed.

6. The proximity of the SPA/SAC in the western part of the district together with the topographical constraints precludes further allocations in the upper valley areas. Reducing the allocations would result in the housing requirement not being met thus making it difficult for the Council to have the Local Plan found sound. No modifications are therefore proposed.

Document Section: Commenting on Filtered (Rejected) Sites

Representations

Comment ID **HRU14** Site ref (if applicable): **LP1583**

Person ID: **1139625** Name: **Mr Mark Jones** Organisation: **David Wilson Homes**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

Please 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/5578795

Comment ID **HRU1402** Site ref (if applicable): **LP0196**

Person ID: **980588** Name: **Mr Mark Baxendale** Organisation:

Agent ID: **960432** Name: **Mrs Charlotte McKay** Organisation: **Principal IOP Consulting**

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

Legal Compliance Reason:

See attached document

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

Sound Reason:

See attached document

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

Duty to Co-operate Reason:

See attached document

Suggested Modifications:

Inclusion of site LP0196

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5609791 ; http://calderdale-consult.objective.co.uk/file/5609790

Comment ID **HRU1444** Site ref (if applicable): **LP0006**

Person ID: **1125055** Name: **Mr John Logan** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

The summary reasons advanced for filtering this site - following the current re-appraisal -confirm the initial Site Assessment Report conclusions: 'Given the ecological concerns, impact on heritage, and given the land is high sensitive Green Belt, as well as having regards 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.' I find this conclusion remarkable in the overall context of the Local Plan proposals, because it runs counter to conclusions arrived at by Calderdale in proposing sites for development in this geographical areaand within the same West Yorkshire Green Belt. This issue highlights concerns that I haveraised in my previous consultation responses where my comments were primarilyconcerned withrejecting the development of the proposed site LP1451 and keeping this land within the Green Belt. I expressed the view that the Calderdale Green Belt Review was fundamentally flawed for a variety of reasons, including; the 'scoring' methodology, the lack ofspecific reviews of 'critical' Green Belt' areas whereboundaries abutted or were shared with adjacent Authorities and insufficient regard for safeguarding the best and most valuable (bmv) land capable of growing cereal crops: which has contributed to sites being included in the draft Local Plan that arenot 'evidence based' and thus not 'sound'. LP0006is a very small site, on the urban fringefronting the A641, is notfarmland or recreation space,is situated within thegrounds of a private residential property - albeit a listed building - and the proposal is for a very small development, with vehicular access onto a side road rather than the main A641. Contrast this site with the proposed Employment Site LP1618: this is a 7 Ha site on agricultural land, fronting the A641 - ata point where the road is a dual carriageway with a grassed central reservation and a 50 mph speed limit. From a viewpoint on the A641, the site abuts LP0006and continues south right up to the Calderdale boundary on the northern embankment of the M62. The Site Assessment mentions proximity to Toothill Court as a constraint, which presumably is something that can be 'mitigated' as the site is then put forward for approval. However, there is no mention of the footpath crossing the site leading to a footbridge across the M62 and the Site Plan shows no vehicle access point - logic suggests thishas to bedirectly off the A641. Directly opposite this site is the proposedurban extensionLP1451 which

does have a Junction A641 Plan, but how a feasible Highways Scheme can be developed that takes account of the existing Toothill Lane/Woodhouse Lane junctions; access to the proposed LP1451 and LP1618 sites in Calderdale; the recently approved Kirklees Bradley planwith a site entrance on the east side of the A641 almost opposite the existing Dorchester Road one; existing pressures on the Bradley roundabout further exacerbated by the new Bradley development; whilst also accommodating the much vaunted M62 J24a East/West, on/off access, intrigues me. But, of course, the fundamental issue here is the Green Belt, witha key reason given for 'filtering' site LP0006 beingbecause it is 'high sensitive Green Belt' and ' the need to protect the Green Belt as far as possible'. Calderdalesproposal will result in this very small Green Belt site - when viewed from the A641 - now being sandwiched between the urban edge and Employment Site LP1618, which is completely irrational. The central tenets of Green Belt being to avoid ' sprawl ' ' merger ' and 'encroachment' withan emphasis on 'openness' - which has a visual and a spatial element -are being completely ignored. The overall Green Belt parcel of land, in this particulargeographical area, is an original West Yorkshire one shared between Calderdale and Kirklees with the boundary being the north embankment of the M62. Currently, when viewed from the A641, the distance between the built settlements of Brighouse and Huddersfield is approximately 800 metres, with the boundary line lying half way between the two. On the western side of the M62 there is Green Belt agricultural land inKirklees matched by the same inCalderdale. The proposed Calderdale Employment Site LP1618 is to be built on their agricultural landwhich will reduce the 'Strategic Gap' between the settlements - within separate Local Authority Districts - to around 400 metreswith inter-visibility between the two, resulting in a very clear perception of 'sprawl' and 'merger'. Given the shared nature of this West Yorkshire Green Belt parcel, the significance of this 'sprawl/merger' has to viewed intermsofits wider conurbation impact. The settlement sizes- in population terms - within the relevant contexts are: Locally: Huddersfield is the largest settlement in Kirklees and Brighouse the second largest in Calderdale; West Yorkshire region: Huddersfield is the 3 rd largest settlement, with Brighouse the 9 th ; and the A641 is the main route from Huddersfield, through Brighouse, to Bradford which is the 2 nd largest; and Nationally: West Yorkshire is the 4 th largest urban area in the UK. Numerous Calderdale Local Plan documentsstress the point that ' exceptional ' reasons are needed to removeland from the protection of the Green Belt: which at its very basic level just means that ifit can be demonstrated that no other suitable brownfield or greenfield sitesare available then building can take place on Green Belt due to ' unmet need '. In an Authority of this size I find it incredible that LP1618 - on a land area of just 7 Ha - can be approved for development in a geographical area that is acknowledged as ' high sensitive Green Belt ' and satisfy the test of being 'exceptional ' due to 'unmet need' because no alternative site can be sourced from within the District . Following on from the comparison of site LP0006 with LP1618and itsirrational conclusion around Green Belt issues, there are also very similar issues to be raised in relation to site LP0006when compared withLP1451, again in this same Green Belt area. Whereas, the first case contrasts the refusal of housing developmentfor minor Green Belt issues on a very small site, with approval of an Employment Site on a significantly larger site, the second case contrasts the refusal of LP0006 with the approval of LP1451, which is a relativelylarge urban extension Housing Site of 63 Ha, which is proposed to provide 1257 properties. Both LP0006 and LP1451 sites are recognised in the Green Belt Review as performing strongly in terms of the 5 Green Belt purposes fortheir continued inclusion in the Green Belt. However,the proposalfor a large scale development onLP1451 is viewed as less damaging to the Green Belt and worthy of approval, where the development of a small number of properties on LP0006 is filtered - which isa conclusion that is I cannot comprehend. Perhaps, the answer to this extraordinary decision can be found by examining theDuty to Co-Operate process where Calderdale has agreed a Statement of Common Ground with its neighbour Kirklees to develop site LP1451 on the Green Belt. However, closer examination of this particular process and statement raises a host of further issues. When reviewing the Draft Kirklees Local Plan the Inspector raised the following pertinent and incisive question in relation to their Bradley site: What effect would the proposed boundary changes and allocations have on the Green Belt and the purposes of including land within it? In particular, how would the existing gap between Huddersfield and Brighouse be affected? Kirklees Response was: 1.97 Calderdale Council's Local Plan (Initial Draft) dated 2017, proposes a new 'garden suburb' (reference

LP1451), known as 'Land between Bradley Wood and Woodhouse Lane, Rastrick). This proposal extends to approximately 63 hectares and proposes approximately 1257 dwellings. It should be noted that this plan is draft and has not reached publication/submission stage and therefore the weight to be given to this proposal is limited. Should this proposal not proceed in the Calderdale Local Plan there is a possibility that the existing green belt boundary in Calderdale (south of Woodhouse Lane) could remain in situ, meaning that the green belt gap would remain extensive. 1.98 It is common ground between Calderdale and Kirklees councils that the green belt gap between Huddersfield and Brighouse/Rastrick will still perform a strategic role and continues to meet the purposes of including land in the green belt as set out in the joint statement of common ground (SC007). The northern boundary of H1747 follows the southern edge of Bradley Wood. The wood extends to the north of the M62 motorway, into Calderdale, and forms the southern boundary of the proposed garden suburb allocation (LP1451). This prevents the physical merger/coalescence of settlements and together with the topography in this location, where the M62 sits atop the ridgeline between the two urban areas, assists in avoiding the appearance of merger. 1.99 To the west/south-west the wood tapers out to where open agricultural land extends to both sides of the M62 motorway. As the woodland is not present at this point it would be possible for built development to the north of the M62 in Calderdale to be developed. For this reason the northern extent of H351(Bradley Villa Farm) was rejected by the council (rejected housing option H2601). My Comments on the Kirklees Response: 1.97 I note that Kirklees are pleading with the Inspector to give limited weight to the Calderdale proposal and state that, should it not proceed, the Green Belt would remain extensive - a term which is not defined in planning policy and I dispute its implication.Kirklees plea to attach limited weight does notconfirm a robust, evidence based approach to the statutory Duty to Cooperate process and does not indicate that there has been meaningful and on-going consultation between the Authorities. 1.98 The statement that Bradley Wood (with no reference tothat specific part of the Bradley Wood north of the M62 being an Ancient Woodland and thus worthy of protection and a shared responsibility) together with the M62 prevents the physical merger/coalescence of settlements and'assists' in avoiding the appearance of merger is totally misleading. This statement completelyskirts around the fact that the A641 'sits atop' the M62 and will provides clear long distance view of any development, contrary to the Green Belt principle of 'openness'. Further, their statement acknowledges that ' To the west/south-west the wood tapers out to where open agricultural land extends to both sides of the M62 motorway' which will make it visible from the M62 and there will also be long distance views from the M62 onits western approach and from the two footbridges that cross the M62. 1.99 The statement that Kirklees rejected their site H2601 to facilitate the Calderdale development is not borne out by the views expressed in their Site Assessment Report. This report rejected this site on sound Green Belt principles: (Green Belt (RAG) Score Red) ThissiteisanareaofpasturelandlocatedbetweenthelastpropertyonBradfordRoadandtheM62motorway.Itisnot well configured relative to the existing settlement form as it will leave green belt land between the site and the settlement vulnerable to development pressure. Development at its north western extreme would reduce the width of the strategic gap in Kirklees solely to the motorway, although the motorway would prevent physical merger and there is green belt in Calderdale which would retain an undeveloped gap. The land slopes up towards the south and this undeveloped slope is highly visible from the south, and from the motorway. Development would therefore encroach into the countryside and be highly visible in long distance views to the detriment of openness and contrary to the purposes of including land in the green belt. and concludes: There are no exceptional circumstances to justify the removal of this site or any part of this site from the green belt. The Kirklees Bradley site, whilst itis on Green Belt, does nothave any impact on the Strategic Gap between the two settlementsof Huddersfield and Brighouse as viewed from the A641/M62.Therefore, I have no issues with this in terms of sprawl and merger as builtdevelopmentwill not extend past the existing Kirklees properties on either side of the A641. However, the Calderdale proposals in relation to sites LP1618 and LP 1451 willresult in development right up to their District boundary. If the Calderdale Green Belt Review had properly considered the issues of the sensitivity of Green Belt abutting and shared with adjacent Districts; had adopted a rational scoring system; recognised the value of protecting scarce bmv land capable of growing cereal crops;and focused on protecting Ancient Woodland;

then an objective appraisal system that was evidence based would have filtered sites LP1618 and LP 1451 at a very early stage. Ultimately, it seems that the Calderdalestrategy in relation to site LP1451 is to adopt the tactic of arguingthat the release of Green Belt is necessary due to 'unmet housing need'. However, even a cursory examination wouldhighlight the significant flaws in adopting this large 'garden suburb' approach to provide 1257 properties. In developing their proposals Calderdale have examined a number of possible garden suburbs before settling on just two within the Brighouse area. Primarily the reason givenfor filtering other sitesis that Brighouse is more suitable because it is next to the M62 - with no objective, site by site, evidence based justification contained in their report 'Justification for Southeast Calderdale Garden Suburbs', that is certainly a misnomer.The Inspector's Question on Employment sites not being matched by Housing sites provision has provided Calderdale with the opportunity to re-examine the relationship between the two and address spatial distribution issues between Brighouse and Halifax thathas not been taken. As an example, there arefour sites in Halifax, LP 1457, 1458, 1459, and 1461 that were all filtered, with each one capable of providing more than the 1257 properties on LP1451. The first three of these sites are capable of providing 6,048 properties. I acknowledge that site LP 1461 is a composite of a number of sites, where some have gone forward for approval, but taking this into account yields an estimate of the overall potential Halifax contributionbeing in the order of 8,000 properties. Given the disparity in housing provision between Brighouse and Halifax,and in order to redress the overall housing and employment spatial imbalance, a reasonablesolution would be to develop some areas within each of those filtered sites. Therefore, in conclusion, I commend site LP0006 for inclusion in the draft Local Plan and for sites LP1618 and LP1451 to be filtered.

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 **HRU1508** Site ref (if applicable): **LP1404**

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. They 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:

Re-assess spatial distribution of allocations Allocate LP1404 as a New Housing Site or amend Green Belt boundary to include this as part of the PHA.

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5609966

Comment ID **HRU1516** Site ref (if applicable): **LP1651**

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?:

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. They 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:

allocate LP1651 as a New Housing Site

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5609971

Comment ID **HRU1522** Site ref (if applicable): **LP0029**

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

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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. 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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 CiI 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. 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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. They 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:

allocate LP0029 as a New Housing Site

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610038

Comment ID **HRU1524** Site ref (if applicable): **LP1554**

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. They 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

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

Duty to Co-operate Reason:

Suggested Modifications:

allocate LP1554 as a New Housing Site

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610041

Comment ID **HRU1526** Site ref (if applicable): **1570**

Person ID: **1103103** Name: **Mrs Gill Rimmer** Organisation:

Agent 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:

We support the decision the Council has taken, in light of the numerous issues raised, to remove this site from the 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 **HRU1530** Site ref (if applicable): **LP0049**

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. They 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. 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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:

allocate LP0049 as a New Housing Site

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610050

Comment ID **HRU1533** Site ref (if applicable): **LP0049**

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:

see previous submission

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

Duty to Co-operate Reason:

Suggested Modifications:

allocate LP0049 as a New Housing Site

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610052

Comment ID **HRU1539** Site ref (if applicable): **LP1596**

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. They 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:

allocate LP1596 as a New Housing Site

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610081

Comment ID **HRU1542** Site ref (if applicable):

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

Duty to Co-operate Reason:

Suggested Modifications:

allocate the site at Ellis Bottom Farm as a New Housing Site

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610091

Comment ID **HRU1550** Site ref (if applicable): **LP1402**

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

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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. 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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. 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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:

allocate LP 1402 as a New Housing Site

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610116

Comment ID **HRU1557** Site ref (if applicable):

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. They 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:

allocate this site as a New Housing Site

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610129

Comment ID **HRU1559** Site ref (if applicable): **LP0979**

Person ID: **1244100** Name: **K Restall** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

The Plan contains sites not well suited to meeting its requirements. This site is a natural extension of the local area. It can be developed now, with a housebuilder proposing a high-quality residential development - with public open space - reflecting the character of the neighbourhood. The site enjoys the advantage of existing infrastructure and services, with homes close to schools, sports facilities and bus stops, and benefitting from the enhanced rail facilities offered by the new Elland station.

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

Duty to Co-operate Reason:

Suggested Modifications:

Inclusion of this site in preference to those less suited to meet the requirements of the Plan

Comments:

Additional Evidence Link:

Comment ID **HRU1564** Site ref (if applicable): **LP0873**

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

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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

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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. They 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:

allocate LP0873 as a New Housing Site

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610138

Comment ID **HRU1567** Site ref (if applicable): **LP1406**

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. They 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:

allocate LP1406 as a New Housing Site

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610143

Comment ID **HRU1572** Site ref (if applicable): **LP0079**

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

Duty to Co-operate Reason:

Suggested Modifications:

allocate LP0079 as a New Housing Site

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610146

Comment ID **HRU1575** Site ref (if applicable): **LP0041**

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). 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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:

allocate LP0041 as a New Housing Site

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610148

Comment ID **HRU1580** Site ref (if applicable): **LP1427**

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. 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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. 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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. 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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. 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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:

Allocate LP1427 as a New Employment site

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610153

Comment ID **HRU1588** Site ref (if applicable): **LP1577**

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

Duty to Co-operate Reason:

Suggested Modifications:

allocate LP1577 as a New Housing Site

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610157

Comment ID **HRU1617** Site ref (if applicable): **LP1111**

Person ID: **1183357** Name: Organisation: **Old Brodleians Rugby Club**

Agent ID: **1129740** Name: **Mr Matthew Sheppard** Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Old Brodleians Rugby Club has made previous representations to this plan seeking the allocation of their playing field at Woodhead, Denholme Gate Road, for housing development (Rejected Site LP1111). This request is part of a wider strategy to deliver much needed improvements to the club facilities and grounds. The club has widely consulted its membership and also discussed the proposals with Ward Councillors. There is overwhelming support for the improvement of club facilities and the enhanced role it wishes to play, both for existing teams, but also for sports provision for the nearby school, and widening the role the club can play in the community by opening up new opportunities for more minority groups to get involved in Rugby. The intention is also to partner with other local sports groups to enhance the facilities available to them. In particular, the Club wishes to enhance opportunities for children, women and disabled people in the local community to access suitable sports facilities and to address major failings in the ability of their current facilities to accommodate this. To achieve this, the club needs to significantly enhance its facilities, both in terms of the playing pitches, but particularly the changing facilities and other club infrastructure. The club has recently purchased more land to allow it to continue its partnership with Hipperholme Grammar School, which will enhance their offer and expand the number of club games that can be played at the same time. It also allows the club to expand the community use of it's facilities. This improvement was funded by a combination of grant funding and member donations, but has left the club with minimal

financial resources. The further improvements the club wants to make are unlikely to be subject to further grant funding in the near future, and the club has used it's resources purchasing the playing fields. The membership has indicated that selling the pitch on the other side of Denholme Gate Road (a rejected site option in the draft plan, site LP1111) would deal with a number of issues, including the safety of junior members crossing the road, and allow the club to consolidate it's activity on the western side of the road. The sale of this land is supported by the club membership, but the club also intends to undertake further consultation with local people, to understand whether there is wider public support for this change, including the benefits which the club would be able to deliver for the community when the needed club improvements are delivered. The surplus land (site reference: LP1111) has been filtered from the draft Plan and has been allocated as an Open Space site (Policy GN6) in the draft Plan. The Club has been in discussions with Council officers and has sought the advice of a transport consultant. The transport issues at the Hipperholme crossroads have been a consistent concern of officers and the current technical note which is part of this consultation sets out the basis for filtering out all potential residential sites in the Hipperholme area. This junction is also affected by development elsewhere in Calderdale and the mitigation options are limited and there are no current plans for improvements. The current consultation - “Technical note on the impact of potential housing allocations on Hipperholme Crossroads" concludes at paragraph 1.17 / 1.18 that in the absence of mitigation, the effects of additional traffic at the crossroads outweighed the benefits of additional housing sites, and that there were other housing sites available in areas where transport funding would improve capacity. The Club is concerned that this -“blanket approach" to restricting new allocations in this area will significantly harm their ability to deliver the benefits they are targeting for the local community. The Club's proposals will result in improved facilities which will facilitate benefits of the following nature: Improved ability to host multiple events for different groups at the same as a result of enhanced changing facilities and pitch provision. Currently gender and age based groups cannot play at the same times as the changing facilities will not allow it. Enhanced provision for junior teams, women's teams, other sports clubs, and potentially disabled access to sports. This will significantly enhance access to sport provision for these groups which are under provided for in the area Greater open community use of facilities Enhanced accessibility to sports facilities for school use Resulting improved access to sporting opportunities for a wider range of the community, with subsequent health and wellbeing benefits. These benefits are very considerable in the context of current physical and mental health concerns, access to open space, and the availability of sporting options to the wider community and, in particular, a more diverse part of the local population. These benefits can also be achieved with limited harm to the Green Belt on the retained Club area of the site, although some expansion of built footprint for sporting uses will be needed. The -“traffic cost" of these benefits will be around 20 peak hour movements, not all of which would be routed through the Hipperholme crossroads. This is a level which is equivalent to daily variation in traffic flows and is too low to be effectively modelled in the higher level transport modelling undertaken for the Local Plan. This level of traffic variation is negligible at worst and should not be used to undermine the very positive community benefits which the Club hopes to unleash as a result of selling their asset for residential development. It is considered that this land could be released for development with very limited practical harm in transport terms, and very significant local benefits. The Club is willing to accept a policy tie to ensure that the proceeds of the sale of this allocation are in fact used to deliver these benefits. It is requested that an exception is made to the - “Hipperholme stand off" to recognise this unique situation and secure significant health and wellbeing benefits for a wider part of the local community. On this basis,we do not consider that the plan meets the "Justified" test of soundness, as it does not provide for the most appropriate strategy, considering thereasonable alternative of allocating this site because ofthe unique public benefits that would arise as a result of this allocation.

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

Duty to Co-operate Reason:

Suggested Modifications:

Allocate rejected site LP1111 for residential purposes. Supporting policy text could confirm that the release of the allocation is linked to enhancements to the sporting facilities at the Rugby Club.

Comments:

Additional Evidence Link:

Comment ID **HRU1653** Site ref (if applicable): **LP1171**

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 CiI 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. They 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:

allocate LP1171 as a New Housing Site

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610210

Comment ID **HRU1658** Site ref (if applicable): **LP0826**

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. 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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. 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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

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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. They 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. 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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:

protect LP0826 from future development at LP1523 constraining the site

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610214

Comment ID **HRU1666** Site ref (if applicable):

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

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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). 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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:

allocate the area as a New Housing Site

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610223

Comment ID **HRU1667** Site ref (if applicable): **LP0979**

Person ID: **1244145** Name: **Mr Simon Kershaw** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

There is evidence that this filtered (rejected) site is likely to be more approriate than some of the potentailly allocated sites, particularly on the basis of flood risk. The Site Assessment Report recognises that the site is suitable for development with the necessary provision for appropriate SuDS/drainage and access provision. The site could also strongly support many of the Sustainability Assessment Objectives identified that have been identified as 'postive' : SA1 - availability of quality housing; SA5 accessibility to essentail services/facilties/employment; SA6 create a locally distinctive built/historic environment (via a development that is sympathetic to the charcter of the locality; SA13 - Ensuring efflicent use of land (the site is adjacent to exisiting infrastructure and services); SA15 - Provide good employment opportunties (meeting the local housing need to attract and retain a skilled workforce); SA17 Enhance viability of town centrres (through an increased potential market for exisiting retailers).

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 **HRU1705** Site ref (if applicable): **LP0074**

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. 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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. 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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. They 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:

allocate LP0074 and LP1610 as a New Housing Site

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610564

Comment ID **HRU1710** Site ref (if applicable): **LP1610**

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:

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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. They 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:

allocate LP0074 and LP1610 as a New Housing Site

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610568

Comment ID **HRU1713** Site ref (if applicable): **LP0862**

Person ID: **957983** Name: **Mr David Storrie** Organisation: **Planning Director David Storrie Planning**

Agent ID: **739959** Name: **Mr David Storrie** Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Please see attached submission. This filtered site appears to have been missed out in the assessment as a Heritage Statement submitted at Publication Draft stage had not been assessed. Such an omission means that the Plan has not been positively prepared where sustainable sites have been overlooked.

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

Duty to Co-operate Reason:

Suggested Modifications:

That the site is removed from the Green Belt. That the site is allocated for housing

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610569 ; http://calderdale-consult.objective.co.uk/file/5618775 ; http://calderdale-consult.objective.co.uk/file/5618774 ; http://calderdale-consult.objective.co.uk/file/5618773 ; http://calderdale-consult.o

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Comment ID **HRU1718** Site ref (if applicable): **LP0074**

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:

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

Duty to Co-operate Reason:

Suggested Modifications:

allocate LP0074 and LP1610 as a new housing site

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610571

Comment ID **HRU1721** Site ref (if applicable): **LP1610**

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:

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

Duty to Co-operate Reason:

Suggested Modifications:

allocate LP0074 and LP1610 as a new housing site

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610572

Comment ID **HRU1725** Site ref (if applicable): **LP0074**

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:

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

Duty to Co-operate Reason:

Suggested Modifications:

allocate LP0074 and LP1610 as a New Housing Site

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610574

Comment ID **HRU1728** Site ref (if applicable): **LP1610**

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:

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

Duty to Co-operate Reason:

Suggested Modifications:

allocate LP0074 and LP1610 as a new housing site

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610577

Comment ID **HRU1734** Site ref (if applicable): **LP0074**

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:

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

Duty to Co-operate Reason:

Suggested Modifications:

allocate LP0074 and LP1610 as a new housing site

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610581

Comment ID **HRU1735** Site ref (if applicable): **LP1610**

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:

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

Duty to Co-operate Reason:

Suggested Modifications:

allocate LP0074 and LP1610 as New Housing Site

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610582

Comment ID **HRU1753** Site ref (if applicable): **LP1216**

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. They 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:

Change the New Housing Site to Employment Site

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610749

Comment ID **HRU1759** Site ref (if applicable): **LP1015**

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. They 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:

allocate LP1915 as a New Housing Site

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610751

Comment ID **HRU1764** Site ref (if applicable): **LP1071**

Person ID: **1244225** Name: **Mr J Payton** Organisation:

Agent ID: **1129114** Name: **Mr Roger Lee** Organisation:

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 selection of additional sites for housing is inconsistent with previous conclusions. Some sites allocated are either not developable or have significant constraints such as flooding. Site LP1071 has been assessed as performing poorly in terms of its current green belt function whereas other proposed allocated sites perform significantly higher in terms of current green belt allocation. The site is adjacent to an existing built up area, it doesn't carry any constraints other than potential pressure on the traffic lighted crossroads in Hipperholme. Development can help fund improvements in any event and not all potential housing sites need to be allocated in the area of the crossroads. The site is developable now and free from constraints.

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

Duty to Co-operate Reason:

Suggested Modifications:

Site to be included as a housing allocation

Comments:

Additional Evidence Link:

Comment ID **HRU1775** Site ref (if applicable): **LP0819**

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. 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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. 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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. They 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:

allocate LP0108 as a New Housing Site

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610766

Comment ID **HRU1785** Site ref (if applicable): **LP0949**

Person ID: **1244225** Name: **Mr J Payton** Organisation:

Agent ID: **1129114** Name: **Mr Roger Lee** Organisation:

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 reasons for the exclusion of the site as a housing allocation are inconsistent and illogical. There are no significant constraints to development. The site is in flood zone 1, it can provide a suitable and safe access and it performs poorly in terms of its existing green belt allocation. It is also immediately adjacent to a sustainable built up area. The heritage impacts are capable of being addressed through a suitable development. Other sites are being put forward which carry greater green belt and flooding impacts in particular. The site is privately owned and capable of being developed immediately.

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

Duty to Co-operate Reason:

Suggested Modifications:

Site to be included as a housing allocation

Comments:

Additional Evidence Link:

Comment ID **HRU1794** Site ref (if applicable): **1570**

Person ID: **1060238** Name: **Mr Derek Whitworth** 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/5618578

Comment ID **HRU1795** Site ref (if applicable): **1571**

Person ID: **1060238** Name: **Mr Derek Whitworth** 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/5618580

Comment ID **HRU1796** Site ref (if applicable):

Person ID: **1060238** Name: **Mr Derek Whitworth** 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/5618581

Comment ID **HRU1801** Site ref (if applicable):

Person ID: **965141** Name: **Mr Dave Wade** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

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/5618612 ; http://calderdale-consult.objective.co.uk/file/5618617 ; http://calderdale-consult.objective.co.uk/file/5618615 ; http://calderdale-consult.objective.co.uk/file/5618618 ; http://calderdale-consult.o

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Comment ID **HRU1804** 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/5619001

Comment ID **HRU1924** Site ref (if applicable):

Person ID: **1246476** Name: **S Gibson** Organisation:

Agent ID: **1183489** Name: **Mr John Carlon** 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/5632072

Comment ID **HRU1976** Site ref (if applicable): **1626**

Person ID: **1094576** Name: **Mr Brian Reynolds** Organisation: **Gleeson Homes Ltd**

Agent ID: **1104252** Name: **Mr Mark Eagland** Organisation: **Peacock & Smith**

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

Legal Compliance Reason:

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

Sound Reason:

Gleeson has proposed Land at Hays Lane, Halifax (LP1626) for housing (indicative site layout plan attaced), essentially as an extension to the Phase 1 Gleeson scheme at Hays Lane which is under construction. As a second phase of the latter development Site LP1626 is an obvious choice to provide for additional flexibility in the housing supply, given that necessary services and infrastructure have already been provided as part of Phase 1. This site is level, has no significant physical constraints and the success of the Phase 1 Gleeson schjeme shows that it is a location that it is likely to be in demand. Indeed, at Issues and Options stage LP1626 was proposed as a housing allocation by the Council ; presumably because Officers considered that the site had strong merits for residential development. LP1626 is also located in the Halifax sub area of the Borough, the top tier of the settlement hierarchy. Whilst LP1626 was subsequently filtered out by the Council, we consider that the site would cause no more harm to the Green Belt than the other new housing sites that the Council is proposing as part ofthe Housing Requirement Update consultation, nor is it more constrained in respect of potential showstopping issues once mitigation is taken into account. The Site Assessment Report refers to potential impacts on the South Pennine Moors SSSI/SAC/SPA and the lack of a Habitats Regulations Assessment (HRA), but Gleeson instructed SLR Consulting to prepare an ecological impact assessment together with a HRA in order to address the ecological constraints referred to in the site assessment report, and this has been provided to the Council.

The impact assessment and HRA prepared by SLR demonstrate that: ï,· The site is 1.7km from the SPA, SSSI and SAC. Given this distance there is very unlikely to be any linked functionality between the site and these protected areas. ï,· The curlew records provided by WYES are very likely to be nesting outside of the SPA and do not form part of the SPA assemblage. Any impact upon on them (if an impact were to arise) would not affect the integrity of the SPA per se. ï,· The site is sub optimal as a feeding/nesting resource for wading birds and consequently any direct impact on wading birds on or near the site would be minor, at worst. ï,· There is unlikely to be significant additional recreational impacts on the SPA, SSSI and SAC as a result of a residential development of site LP1626. ï,· The site does not have appreciable potential to support breeding or feeding waders. ï,· There would be a minor positive impact on woodland in the east of the site that forms part of the Calderdale Wildlife Habitat Network. Given the above, Gleeson disagrees with the Site Assessment Report conclusion that ecology is a showstopper constraint that prevents allocation of LP1626 for housing.

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

Duty to Co-operate Reason:

Suggested Modifications:

The Local Plan should have a greater buffer of housing supply (5 to 10%) to ensure that identified development needs are met. Land at Hays Lane, Halifax (LP1626) should be allocated for housing to help provide such additional flexibility.

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5632464 ; http://calderdale-consult.objective.co.uk/file/5632465

Comment ID **HRU1980** Site ref (if applicable): **331**

Person ID: **1246540** Name: **Countryside Properties** Organisation: **Countryside Properties**

Agent ID: **691692** Name: **Ms Lucie Jowett** Organisation: **Senior Planner Barton Willmore**

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

Legal Compliance Reason:

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

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION

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

Duty to Co-operate Reason:

Suggested Modifications:

Allocate LP0331 for residential development

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5632466

Comment ID **HRU1981** Site ref (if applicable): **1072**

Person ID: **1246540** Name: **Countryside Properties** Organisation: **Countryside Properties**

Agent ID: **691692** Name: **Ms Lucie Jowett** Organisation: **Senior Planner Barton Willmore**

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

Legal Compliance Reason:

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

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION

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

Duty to Co-operate Reason:

Suggested Modifications:

Allocate LP1072 for residential development

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5632466

Comment ID **HRU1991** Site ref (if applicable): **1583**

Person ID: **855708** Name: **Barratt Homes & David Wilson Homes** Organisation: **Barratt Homes & David Wilson Homes**

Agent ID: **691692** Name: **Ms Lucie Jowett** Organisation: **Senior Planner Barton Willmore**

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

Legal Compliance Reason:

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

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION

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/5632467

Comment ID **HRU1992** Site ref (if applicable): **982**

Person ID: **855708** Name: **Barratt Homes & David Wilson Homes** Organisation: **Barratt Homes & David Wilson Homes**

Agent ID: **691692** Name: **Ms Lucie Jowett** Organisation: **Senior Planner Barton Willmore**

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

Legal Compliance Reason:

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

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION

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/5632467

Comment ID **HRU1993** Site ref (if applicable): **773**

Person ID: **855708** Name: **Barratt Homes & David Wilson Homes** Organisation: **Barratt Homes & David Wilson Homes**

Agent ID: **691692** Name: **Ms Lucie Jowett** Organisation: **Senior Planner Barton Willmore**

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

Legal Compliance Reason:

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

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION

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/5632467

Comment ID **HRU1994** Site ref (if applicable): **979**

Person ID: **855708** Name: **Barratt Homes & David Wilson Homes** Organisation: **Barratt Homes & David Wilson Homes**

Agent ID: **691692** Name: **Ms Lucie Jowett** Organisation: **Senior Planner Barton Willmore**

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

Legal Compliance Reason:

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

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION

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/5632467

Comment ID **HRU2004** Site ref (if applicable): **1541**

Person ID: **960869** Name: **Stonebridge Homes** Organisation:

Agent ID: **691692** Name: **Ms Lucie Jowett** Organisation: **Senior Planner Barton**

Willmore

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

Legal Compliance Reason:

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

Sound Reason:

PLEASE SEE ATTACHED FOR FULL REPRESENTATION

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/5632468

Comment ID **HRU2014** Site ref (if applicable): **220**

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 REPRESENTAION

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 **HRU2015** Site ref (if applicable): **1141**

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 REPRESENTAION

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 **HRU2103** Site ref (if applicable): **1453**

Person ID: **1182211** Name: Organisation: **Thornhill Estates**

Agent ID: **1182209** Name: **Miss Rachel Flounders** Organisation: **ID Planning**

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION

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/5633670

Comment ID **HRU2105** Site ref (if applicable): **1103**

Person ID: **516070** Name: Organisation: **HTL Properties**

Agent ID: **1182209** Name: **Miss Rachel Flounders** Organisation: **ID Planning**

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

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/5633685 ; http://calderdale-consult.objective.co.uk/file/5633686 ; http://calderdale-consult.objective.co.uk/file/5633684 ; http://calderdale-consult.objective.co.uk/file/5633683 ; http://calderdale-consult.o

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Comment ID **HRU2106** Site ref (if applicable): **1612**

Person ID: **516070** Name: Organisation: **HTL Properties**

Agent ID: **1182209** Name: **Miss Rachel Flounders** Organisation: **ID Planning**

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

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/5633683 ; http://calderdale-consult.objective.co.uk/file/5633686 ; http://calderdale-consult.objective.co.uk/file/5633685 ; http://calderdale-consult.objective.co.uk/file/5633684 ; http://calderdale-consult.o

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Comment ID **HRU2107** Site ref (if applicable): **1613**

Person ID: **516070** Name: Organisation: **HTL Properties**

Agent ID: **1182209** Name: **Miss Rachel Flounders** Organisation: **ID Planning**

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

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/5633685 ; http://calderdale-consult.objective.co.uk/file/5633687 ; http://calderdale-consult.objective.co.uk/file/5633683 ; http://calderdale-consult.objective.co.uk/file/5633684 ; http://calderdale-consult.o

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Comment ID **HRU2168** Site ref (if applicable):

Person ID: **1129942** Name: **Norah Smith** Organisation:

Agent ID: **1246896** Name: **Gen Kenington** Organisation: **Associate Director Johnson Mowat Planning Ltd**

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION Continued objection to the rejection of Site LP1472 We have recommended that the housing requirement should be increased to 1,040 dwellings per annum for the full

Plan Period. We have objected to the lack of flexibility in the supply of additional sites, and we have identified concerns with the Council's identified additional sites, including the lack of sites identified in Brighouse, and concerns with a number of sites with identified flood risk issues. It is therefore recommended that additional deliverable housing sites are identified. Site LP1472 is an ideal candidate for a housing allocation, it having been identified in the Initial Draft Local Plan as a suitable housing allocation. The site is not included in the 'Rejected Site Options' contained in the Potential Sites ; Considered and Rejected (CR37) document. This is despite the details of site LP1472 being re-sent to the Local Plan team shortly after the Inspector's 16th July letter (INS07). The site has been promoted via previous iterations of the Local Plan, with the following documents submitted to the Initial Draft Local Plan in September 2017. These documents have been instructed at considerable cost by the landowner. Further copies of the below can be provided upon request, a copy of the Illustrative Masterplan is enclosed at Appendix 1 to this response: o Johnson Mowat Initial Draft and Publication Draft Response o Illustrative Masterplan o Highways Supporting Statement o Preliminary Ecological Appraisal It is disappointing that the Council's Site Assessment Report for the Publication Draft concludes that as a result of the 'numerous constraints' the site has been filtered. There are not 'numerous constraints' and we strongly request the reconsideration of this site. It is a suitable, available and deliverable housing site on the edge of the Brighouse urban area, with no flood risk issues. Looking at each element of the Council's Site Assessment in turn, we make the following comments: Highways There are no show stoppers highlighted in relation to the impact of the site on the highway network. Highways England comments are generic and highlight the Road Investment Strategy (RIS) planned improvements to the Strategic Road Network and need for additional capacity improvement measures to cater for demand generated by development in Calderdale and neighbouring Districts to 2030. Highways England comments state that the traffic generated and attracted by this site, when considered individually, does not have any significant impact on the mainline of the strategic road network in Calderdale District and neighbouring areas of West Yorkshire. Highways England merely conclude by recommending that the development of this site should not be commenced until completion of the RIS schemes programmed to start in the current roads period (2015/16 ; 2019/20). The Council's Site Assessment still makes reference to access onto Reins Road being possible subject to third party land. This is not the case and is incorrect. Third party land is not required to allow access into the site via Reins Road. The Council have not rectified this statement since the Initial Draft Local Plan Site Assessment, despite acknowledging and making reference to the Highways Statement that formed part of the documentation submitted in support of the proposed housing allocation in the Initial Draft Local Plan. The Highways Statement states: -“Reins Road bounds the proposed 'redline' of the site and therefore there are no issues over land ownership and delivery of a site access road."The site observations in relation to access should be amended to reflect the information submitted in support of the site. The site has a suitable access with no third party land required. The Council's Site Assessment refers to our supporting Highways statement to the Initial Draft Local Plan. However it states -“that the effective width of Reins Road is restricted by parked cars for significant lengths. The number of dwellings that could be served from that road would be determined as part of a review of any future application but it is likely that an additional access would be required."We do not accept this conclusion and remain of the view that the site is developable with potential access issues being resolvable. Further, it should be noted that the highways comments were made based on the Council's indicative site capacity of 83, which was calculated based on the developable site area of 2.42 ha. The ecologically led design proposed and put forward to the Council reduces the developable area and subsequently the indicative capacity to 56 dwellings. It is maintained that a proposal of 56 dwellings would not render the requirement for an additional access. Ecology Previous comments to the Initial Draft and Publication Draft Local Plan remain within the Council's Site Assessment, with additional comments included in relation to the Preliminary Ecological Appraisal. It does not appear that the Ecology comments have had regard to the proposed masterplan for the site, which clearly shows an ecologically / landscape driven layout. Despite this the comments make reference to the 'significant ecological management' required and refer to the 'undoubtable loss of natural habitats / wildlife species' and question whether the required ecological management would be feasible; practical to maintain;

financially viable; and enforceable if not done. The practicalities of an ecological management programme should not result in this suitable housing allocation being filtered. Indeed, despite the ecological comments referred to above, the Ecology conclusions are that the site is acceptable subject to mitigation, and it is stated that it is likely that adverse ecological impacts can be mitigated. Despite the Ecology conclusions that the site is acceptable, it is again disappointing that the overall conclusion in the Council's Site Assessment refers to ecology being one of the constraints leading to filtering the site. This was not the case in the Initial Draft Local Plan, whereby the Site Assessment concluded that -“there are no significant constraints"and sought to identify the site as a New Housing Site. Open Space We object to the Council's Site Assessment which refers to the site performing the function of a natural / semi-natural open space. This is privately owned land, with no public access rights through the site. While there are existing public rights of way along the south eastern and north western boundaries there are no rights through the site. The site also lies immediately adjacent to proposed open space (Policy GN6) which can benefit future residents of site 1472. There was no loss / no impact identified in relation to open space in the Initial Draft Local Plan Site Assessment. Green Belt Review We note the Council's response to the Green Belt comments and welcome that the Council agree that Reins Wood would act as a strong defensible boundary. However, the reasoning that the site is currently acting as a barrier to sprawl does not take into account that the housing and economic needs of the Borough requires land to be deleted from the Green Belt. The Borough does not have the supply of land without the release of Green Belt, and meeting this need is a justified exceptional circumstance for removing land from the Green Belt. We maintain our view that the removal of this site from the Green Belt would not increase the potential merging of towns. There is very little chance of merging of towns as a result of the removal of this site from the Green Belt. Site 1472 lies on the south western edge of Brighouse, with Elland to the west and Southowram/ Hipperholme to the north, both currently separated by Green Belt. However, the release of Site 1472 from the Green Belt will not lead to the coalescence of Brighouse with these settlements due to the clear undevelopable land to the immediate north which will prevent coalescence. The undevelopable land includes the railway line, beyond that the River Calder, and beyond that the Calder and Hebble Navigation Canal. There is a strong argument that the existing Reins Wood and Strangstry Wood that bounds Sites 1472, 0893 and 1453 as well as the other landmarks mentioned would act as a much stronger defensible Green Belt boundary that will contain the sprawl of Brighouse, and this defensible containment would be a much stronger boundary than the existing open nature of Sites 1472, 0893 and 1453. Site 1472 is available, located in a sustainable area on the edge of Brighouse, which is a high order town in relation to the Boroughs settlement hierarchy, set to accommodate a strong focus in delivering the Borough's housing requirement. The removal of this site from the Green Beltwould not undermine the functions and purpose of the Green Belt, and would assist in accommodating housing in a sustainable location. The site does not fulfil a strategic Green Belt function, and its removal from the Green Belt is wholly justified in order to meet the housing requirement in Calderdale MBC over the plan period. The loss of the site from the Green Belt would no cause overall harm to the purposes of the Green Belt. Deliverability The Deliverability element of the Council's Site Assessment has ignored the Masterplan and the ecological buffers that have been incorporated resulting in a reduced net developable area. The net developable area identified on the proposed masterplan is 1.6 ha, which is significantly lower than the Council's 2.42ha estimate. We have explained and justified the reasoning behind the reduced developable area. The proposed Masterplan provides a 20m standoff as well as retaining existing boundary planting and hedgerows within the site, hence the reduced developable area. This results in an attractive, realistic and deliverable site. Overall Assessment Summary We disagree with reference to the site being between a 15 and 30 minute journey time to Elland Town Centre. The site is on the edge of Brighouse, and therefore the assessment should be made to its accessibility to Brighouse. The Highways Statement submitted to the Initial Draft Local Plan consultation includes details of the accessibility of the site, which lies within 400m of bus stops on Sherburn Road, Highfield Road and Holly Bank Road, with bus journey times of between 8 and 11 minutes to Brighouse Bus Station and a bus frequency of 15 minutes. As referred to in relation to Highways and Ecology, we are disappointed that the Council's summary of the site assessment refers to 'numerous constraints' and specifically references

access and ecology. Based on the concerns with the lack of buffer, concerns with the flood risk of some of the overall housing requirement; the over reliance on the delivery of the two Garden Suburbs, and the concerns with the deliverability of a number of sites, there is a strong justification to re-instate Site 1472 as a housing allocation as proposed in the Initial Draft Local Plan. Conclusions This response highlights a number of concerns with the housing requirement, housing supply and identified additional sites, concluding for a number of reasons that additional land for housing needs to be identified. Site LP1472 was identified as a preferred new housing site in the Initial Draft Local Plan with no significant constraints identified. Objections were made to the subsequent rejection of the site in the Publication Draft, and it is disappointing that the site continues to be rejected, now the Council have identified additional sites as a result of the housing requirement update. For the reasons stated above, site LP1472 is an available, suitable and deliverable site that should be allocated for housing in the Local Plan. The site has considerable interest from 2 no. housebuilders. The site fits with the spatial strategy, it being located on the edge of Brighouse, and we disagree with the Council's statement that there are more suitable and available sites elsewhere. Of the additional sites identified, we have serious reservations with the deliverability of a number of them. We maintain that Site 1472 is very well contained and could be justifiably released as a standalone site, with its own access via Reins Road. Equally, it would be appropriate and logical to release the site alongside Site 1453, which is equally well contained by a defensible Green Belt boundary, and would allow the delivery of a secondary access from Lillands Lane as deemed necessary. We strongly urge the Council to reconsider their approach and identify Site 1472 for residential development.

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

Duty to Co-operate Reason:

Suggested Modifications:

Increase housing requirement to minimum of 15,600 Identify additional housing sites Identify LP1472 as a Housing Allocation

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5634580

Comment ID **HRU2244** Site ref (if applicable): **22**

Person ID: **961885** Name: **Alcuin Homes** Organisation:

Agent ID: **1128721** Name: **Mr Alistair Flatman** Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

PLEASE SEE ATTACHED FOR FULL REPRESENTATION This letter of representation has been prepared on behalf of Alcuin Homes. It is considered the Local Plan is unsound and objection is raised to the continued nonallocation of their site at Stoney Lane, Brighouse. This letter should be read in association with the

completed Representation Form and Highways Technical Note (Feb 2020) prepared by Optima Highways. Furthermore, reference is also made to previously submitted documentation prepared on behalf of Alcuin Homes demonstrating the suitability of the site for residential development: "¢ Promotional Document prepared by Pegasus Group "¢ Landscape and Visual Statement prepared by Pegasus Group "¢ Indicative Masterplan ; Pegasus Group "¢ Highways Technical Note ; Optima Highways Summary I trust that the above and enclosed (Representation Form and Optima Highways Technical Note) will be given your full consideration and request that the site at Stoney Lane, Brighouse (ref LP0022) be allocated for housing development.

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

Duty to Co-operate Reason:

Suggested Modifications:

Site at Stoney Lane, Brighouse (ref LP0022) should be allocated for residential development

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5635265 ; http://calderdale-consult.objective.co.uk/file/5635266 ; http://calderdale-consult.objective.co.uk/file/5635269

Comment ID **HRU2276** Site ref (if applicable):

Person ID: **1060041** Name: **Mr David Booth** 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/5635459

Comment ID **HRU2300** Site ref (if applicable): **LP0961**

Person ID: **680755** Name: **Mr Michael Ellis** Organisation: **Director Wilson Ellis Ltd**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

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/5635664 ; http://calderdale-consult.objective.co.uk/file/5635663

Comment ID **HRU2318** Site ref (if applicable): **LP0961**

Person ID: **680755** Name: **Mr Michael Ellis** Organisation: **Director Wilson Ellis Ltd**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

THIS COMMENT WAS RECEIVED AFTER THE CLOSURE OF THE REPRESENTATION PERIOD. See attachment for 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: http://calderdale-consult.objective.co.uk/file/5636789

Comment ID **HRU2319** Site ref (if applicable): **LP0006**

Person ID: **680755** Name: **Mr Michael Ellis** Organisation: **Director Wilson Ellis Ltd**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

THIS COMMENT WAS RECEIVED AFTER THE CLOSURE OF THE REPRESENTATION PERIOD. See attachment for 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: http://calderdale-consult.objective.co.uk/file/5636793

Comment ID **HRU2320** Site ref (if applicable):

Person ID: **1247002** Name: **Mr John Haigh** Organisation: **Savills**

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

See attachment for comments

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

Sound Reason:

See attachment for comments

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

Duty to Co-operate Reason:

See attachment for comments

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5636806

Comment ID **HRU2345** Site ref (if applicable): **LP0538**

Person ID: **1246930** Name: **Woodhouse Residents Association** Organisation: **Woodhouse Residents Association**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

See attachment

Do you consider the plan to be Sound?:

Sound Reason:

See attachment

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5635134 ; http://calderdale-consult.objective.co.uk/file/5635135 ; http://calderdale-consult.objective.co.uk/file/5635136

Comment ID **HRU2346** Site ref (if applicable): **LP1548**

Person ID: **1246930** Name: **Woodhouse Residents Association** Organisation: **Woodhouse Residents Association**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

See attachment

Do you consider the plan to be Sound?:

Sound Reason:

See attachment

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5635134 ; http://calderdale-consult.objective.co.uk/file/5635135 ; http://calderdale-consult.objective.co.uk/file/5635136

Comment ID **HRU34** Site ref (if applicable): **LP0987**

Person ID: **1240508** Name: **Mr Mathew Morgan** Organisation: **Martin Walsh Architectural**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

We believe that the housingprovision could fall short of the housing requirements due to difficulties in achieving the outlined densities on various sites in the original allocations and the additional allocations outlined in this consultation. In the event of requiring additional dwellings, sites LP0987 and LP0988 are available and feasible for the provision of around 42 dwellings. Further information regarding these sites is attached in the supporting information, including feasibility plans and technical assessment.

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/5586721

Comment ID **HRU35** Site ref (if applicable): **LP0988**

Person ID: **1240508** Name: **Mr Mathew Morgan** Organisation: **Martin Walsh Architectural**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

We believe that the housingprovision could fall short of the housing requirements due to difficulties in achieving the outlined densities on various sites in the original allocations and the additional allocations outlined in this consultation. In the event of requiring additional dwellings, sites LP0987 and LP0988 are available and feasible for the provision of around 42 dwellings. Further information regarding these sites is attached in the supporting information, including feasibility plans and technical assessment.

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/5586721

Comment ID **HRU702** Site ref (if applicable): **LP1404**

Person ID: **1243169** Name: **Mr Iain Crouch** Organisation:

Agent ID: **1243168** Name: **Mr Iain Crouch** Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

The Plan doesn't provide for a sufficient number of sites for private housebuilding of 3 bedrooms and above, such as this one. The majority of proposed housebuilding within the Draft Plan is of 'social' scale, and this will result in a lack of available housing for local persons wanting to move up the housing ladder whilst remaining in Calderdale, persons wanting to relocate to Calderdale as a result of work, or retire here. The impact of what is proposed currently will not be good for the long-term economic future of the District in terms of maintaining and attracting a workforce, nor for local housebuilders.

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

Duty to Co-operate Reason:

Suggested Modifications:

May I suggest a fresh look at housing sites with a view to allocating a grater proportion of land suitable for 3 and above bed private housing?

Comments:

Additional Evidence Link:

Comment ID **HRU703** Site ref (if applicable): **LP0773**

Person ID: **1243169** Name: **Mr Iain Crouch** Organisation:

Agent ID: **1243168** Name: **Mr Iain Crouch** Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

The Plan doesn't provide for a sufficient number of sites for private housebuilding of 3 bedrooms and above, such as this one. The majority of proposed housebuilding within the Draft Plan is of 'social' scale, and this will result in a lack of available housing for local persons wanting to move up the housing ladder whilst remaining in Calderdale, persons wanting to relocate to Calderdale as a result of work, or retire here. The impact of what is proposed currently will not be good for the long-term economic future of the District in terms of maintaining and attracting a workforce, nor for local housebuilders.

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

Duty to Co-operate Reason:

Suggested Modifications:

An adjustment of the type of site proposed to include a greater number of 3 bedroom and above dwellings.

Comments:

Additional Evidence Link:

Comment ID **HRU704** Site ref (if applicable): **LP0989**

Person ID: **1243169** Name: **Mr Iain Crouch** Organisation:

Agent ID: **1243168** Name: **Mr Iain Crouch** Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

The Plan doesn't provide for a sufficient number of sites for private housebuilding of 3 bedrooms and above, such as this one. The majority of proposed housebuilding within the Draft Plan is of 'social' scale, and this will result in a lack of available housing for local persons wanting to move up the housing ladder whilst remaining in Calderdale, persons wanting to relocate to Calderdale as a result of work, or retire here. The impact of what is proposed currently will not be good for the long-term economic future of the District in terms of maintaining and attracting a workforce, nor for local housebuilders. Contrary to Council comments, this site does have a housebuilder available and is ready for development in the short term. There are no constraints to its development.

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

Duty to Co-operate Reason:

Suggested Modifications:

Inclusion of this site as private housing of 3 bedrooms and above, in place of some of the social housing currently proposed.

Comments:

Additional Evidence Link:

Comment ID **HRU705** Site ref (if applicable): **LP0075**

Person ID: **1243169** Name: **Mr Iain Crouch** Organisation:

Agent ID: **1243168** Name: **Mr Iain Crouch** Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

The Plan doesn't provide for a sufficient number of sites for private housebuilding of 3 bedrooms and above, such as this one. The majority of proposed housebuilding within the Draft Plan is of 'social' scale, and this will result in a lack of available housing for local persons wanting to move up the housing ladder whilst remaining in Calderdale, persons wanting to relocate to Calderdale as a result of work, or retire here. The impact of what is proposed currently will not be good for the long-term economic future of the District in terms of maintaining and attracting a workforce, nor for local housebuilders. Contrary to Council comments, this site does have a housebuilder available and is ready for development in the short term. There are no constraints to its development.

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

Duty to Co-operate Reason:

Suggested Modifications:

The Plan needs to be modified to change the ratio of social housing to private 3 bedroom and larger housing.

Comments:

Additional Evidence Link:

Comment ID **HRU706** Site ref (if applicable): **LP1017**

Person ID: **1243169** Name: **Mr Iain Crouch** Organisation:

Agent ID: **1243168** Name: **Mr Iain Crouch** Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

The Plan doesn't provide for a sufficient number of sites for private housebuilding of 3 bedrooms and above, such as this one. The majority of proposed housebuilding within the Draft Plan is of 'social' scale, and this will result in a lack of available housing for local persons wanting to move up the housing ladder whilst remaining in Calderdale, persons wanting to relocate to Calderdale as a result of work, or retire here. The impact of what is proposed currently will not be good for the long-term economic future of the District in terms of maintaining and attracting a workforce, nor for local housebuilders. Contrary to Council comments, this site does have a housebuilder available and is ready for development in the short term. There are no constraints to its development.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU707** Site ref (if applicable): **LP1016**

Person ID: **1243169** Name: **Mr Iain Crouch** Organisation:

Agent ID: **1243168** Name: **Mr Iain Crouch** Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

The Plan doesn't provide for a sufficient number of sites for private housebuilding of 3 bedrooms and above, such as this one. The majority of proposed housebuilding within the Draft Plan is of 'social' scale, and this will result in a lack of available housing for local persons wanting to move up the housing ladder whilst remaining in Calderdale, persons wanting to relocate to Calderdale as a result of work, or retire here. The impact of what is proposed currently will not be good for the long-term economic future of the District in terms of maintaining and attracting a workforce, nor for local housebuilders. Contrary to Council comments, this site does have a housebuilder available and is ready for development in the short term. There are no constraints to its development.

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

Duty to Co-operate Reason:

Suggested Modifications:

Adjust the ratio of social to 3 bedroom and above housing sites

Comments:

Additional Evidence Link:

Comment ID **HRU708** Site ref (if applicable): **LP0979**

Person ID: **1243169** Name: **Mr Iain Crouch** Organisation:

Agent ID: **1243168** Name: **Mr Iain Crouch** Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

The Plan doesn't provide for a sufficient number of sites for private housebuilding of 3 bedrooms and above, such as this one. The majority of proposed housebuilding within the Draft Plan is of 'social' scale, and this will result in a lack of available housing for local persons wanting to move up the housing ladder whilst remaining in Calderdale, persons wanting to relocate to Calderdale as a result of work, or retire here. The impact of what is proposed currently will not be good for the long-term economic future of the District in terms of maintaining and attracting a workforce, nor for local housebuilders. Contrary to Council comments, this site does have a housebuilder available and is ready for development in the short term.

There are no constraints to its development.

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

Duty to Co-operate Reason:

Suggested Modifications:

adjust the ratio of private to social housing

Comments:

Additional Evidence Link:

Comment ID **HRU709** Site ref (if applicable): **LP0080**

Person ID: **1243169** Name: **Mr Iain Crouch** Organisation:

Agent ID: **1243168** Name: **Mr Iain Crouch** Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

The Plan doesn't provide for a sufficient number of sites for private housebuilding of 3 bedrooms and above, such as this one. The majority of proposed housebuilding within the Draft Plan is of 'social' scale, and this will result in a lack of available housing for local persons wanting to move up the housing ladder whilst remaining in Calderdale, persons wanting to relocate to Calderdale as a result of work, or retire here. The impact of what is proposed currently will not be good for the long-term economic future of the District in terms of maintaining and attracting a workforce, nor for local housebuilders. Contrary to Council comments, this site does have a housebuilder available and is ready for development in the short term. There are no constraints to its development.

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

Duty to Co-operate Reason:

Suggested Modifications:

Adjust the ratio of social to 3 bedroom and above private housing

Comments:

Additional Evidence Link:

Comment ID **HRU710** Site ref (if applicable): **LP0968**

Person ID: **1243169** Name: **Mr Iain Crouch** Organisation:

Agent ID: **1243168** Name: **Mr Iain Crouch** Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

The Plan doesn't provide for a sufficient number of sites for private housebuilding of 3 bedrooms and above, such as this one. The majority of proposed housebuilding within the Draft Plan is of 'social' scale, and this will result in a lack of available housing for local persons wanting to move up the housing ladder whilst remaining in Calderdale, persons wanting to relocate to Calderdale as a result of work, or retire here. The impact of what is proposed currently will not be good for the long-term economic future of the District in terms of maintaining and attracting a workforce, nor for local housebuilders. Contrary to Council comments, this site does have a housebuilder available and is ready for development in the short term. There are no constraints to its development.

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

Duty to Co-operate Reason:

Suggested Modifications:

adjust the ratio of social to 3 bed and above private housing

Comments:

Additional Evidence Link:

Comment ID **HRU711** Site ref (if applicable): **LP0993**

Person ID: **1243169** Name: **Mr Iain Crouch** Organisation:

Agent ID: **1243168** Name: **Mr Iain Crouch** Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

The Plan doesn't provide for a sufficient number of sites for private housebuilding of 3 bedrooms and above, such as this one. The majority of proposed housebuilding within the Draft Plan is of 'social' scale, and this will result in a lack of available housing for local persons wanting to move up the housing ladder whilst remaining in Calderdale, persons wanting to relocate to Calderdale as a result of work, or retire here. The impact of what is proposed currently will not be good for the long-term economic future of the

District in terms of maintaining and attracting a workforce, nor for local housebuilders. Contrary to Council comments, this site does have a housebuilder available and is ready for development in the short term. There are no constraints to its development.

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

Duty to Co-operate Reason:

Suggested Modifications:

readjust provision to provide a higher ratio of private, 3 bedroom and above houses to the currently proposed majority of social housing

Comments:

Additional Evidence Link:

Comment ID **HRU712** Site ref (if applicable): **LP1119**

Person ID: **1243169** Name: **Mr Iain Crouch** Organisation:

Agent ID: **1243168** Name: **Mr Iain Crouch** Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

The Plan doesn't provide for a sufficient number of sites for private housebuilding of 3 bedrooms and above, such as this one. The majority of proposed housebuilding within the Draft Plan is of 'social' scale, and this will result in a lack of available housing for local persons wanting to move up the housing ladder whilst remaining in Calderdale, persons wanting to relocate to Calderdale as a result of work, or retire here. The impact of what is proposed currently will not be good for the long-term economic future of the District in terms of maintaining and attracting a workforce, nor for local housebuilders. Contrary to Council comments, this site does have a housebuilder available and is ready for development in the short term. There are no constraints to its development.

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

Duty to Co-operate Reason:

Suggested Modifications:

Adjust the ratio of proposed 3 bed and above to social housing

Comments:

Additional Evidence Link:

Comment ID **HRU713** Site ref (if applicable): **LP0086**

Person ID: **1243169** Name: **Mr Iain Crouch** Organisation:

Agent ID: **1243168** Name: **Mr Iain Crouch** Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

The Plan doesn't provide for a sufficient number of sites for private housebuilding of 3 bedrooms and above, such as this one. The majority of proposed housebuilding within the Draft Plan is of 'social' scale, and this will result in a lack of available housing for local persons wanting to move up the housing ladder whilst remaining in Calderdale, persons wanting to relocate to Calderdale as a result of work, or retire here. The impact of what is proposed currently will not be good for the long-term economic future of the District in terms of maintaining and attracting a workforce, nor for local housebuilders.

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

Duty to Co-operate Reason:

Suggested Modifications:

alter the ratio of social to 3 bed and above private housing

Comments:

Additional Evidence Link:

Comment ID **HRU778** Site ref (if applicable): **LP1404**

Person ID: **1243169** Name: **Mr Iain Crouch** Organisation:

Agent ID: **1243168** Name: **Mr Iain Crouch** Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Further to my previous comment, I would like to add the following: Many of the sites identified in the Draft Local Plan are not developable as they are either on land with unsuitable topography, or within floodplains. The latest flooding gives evidence to this. New private housing needs to be built in areas close to logical, sustainable access routes to existing shopping centres such as Halifax Town Centre. Certain sites currently proposed (for example sites at Clifton) are not sustainable in this respect. This site is developable

now, it doesn't flood and it is capable of providing private housing of a design suitable for Calderdale's needs going forward for the lifetime of the Plan.

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

Duty to Co-operate Reason:

Suggested Modifications:

Inclusion of this site.

Comments:

Additional Evidence Link:

Comment ID **HRU779** Site ref (if applicable): **LP0773**

Person ID: **1243169** Name: **Mr Iain Crouch** Organisation:

Agent ID: **1243168** Name: **Mr Iain Crouch** Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Further to my previous comment, I would like to add the following: Many of the sites identified in the Draft Local Plan are not developable as they are either on land with unsuitable topography, or within floodplains. The latest flooding gives evidence to this. New private housing needs to be built in areas close to logical, sustainable access routes to existing shopping centres such as Halifax Town Centre. Certain sites currently proposed (for example sites at Clifton) are not sustainable in this respect. This site is developable now, it doesn't flood and it is capable of providing private housing of a design suitable for Calderdale's needs going forward for the lifetime of the Plan.

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

Duty to Co-operate Reason:

Suggested Modifications:

Inclusion of this site

Comments:

Additional Evidence Link:

Comment ID **HRU781** Site ref (if applicable): **LP0989**

Person ID: **1243169** Name: **Mr Iain Crouch** Organisation:

Agent ID: **1243168** Name: **Mr Iain Crouch** Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Further to my previous comment, I would like to add the following: Many of the sites identified in the Draft Local Plan are not developable as they are either on land with unsuitable topography, or within floodplains. The latest flooding gives evidence to this. New private housing needs to be built in areas close to logical, sustainable access routes to existing shopping centres such as Halifax Town Centre. Certain sites currently proposed (for example sites at Clifton) are not sustainable in this respect. This site is developable now, it doesn't flood and it is capable of providing private housing of a design suitable for Calderdale's needs going forward for the lifetime of the Plan.

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

Duty to Co-operate Reason:

Suggested Modifications:

Inclusion of this site

Comments:

Additional Evidence Link:

Comment ID **HRU783** Site ref (if applicable): **LP1017**

Person ID: **1243169** Name: **Mr Iain Crouch** Organisation:

Agent ID: **1243168** Name: **Mr Iain Crouch** Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Further to my previous comment, I would like to add the following: Many of the sites identified in the Draft Local Plan are not developable as they are either on land with unsuitable topography, or within floodplains. The latest flooding gives evidence to this. New private housing needs to be built in areas close to logical, sustainable access routes to existing shopping centres such as Halifax Town Centre. Certain sites currently proposed (for example sites at Clifton) are not sustainable in this respect. This site is developable now, it doesn't flood and it is capable of providing private housing of a design suitable for Calderdale's

needs going forward for the lifetime of the Plan.

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

Duty to Co-operate Reason:

Suggested Modifications:

Inclusion of this site

Comments:

Additional Evidence Link:

Comment ID **HRU784** Site ref (if applicable): **LP1016**

Person ID: **1243169** Name: **Mr Iain Crouch** Organisation:

Agent ID: **1243168** Name: **Mr Iain Crouch** Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Further to my previous comment, I would like to add the following: Many of the sites identified in the Draft Local Plan are not developable as they are either on land with unsuitable topography, or within floodplains. The latest flooding gives evidence to this. New private housing needs to be built in areas close to logical, sustainable access routes to existing shopping centres such as Halifax Town Centre. Certain sites currently proposed (for example sites at Clifton) are not sustainable in this respect. This site is developable now, it doesn't flood and it is capable of providing private housing of a design suitable for Calderdale's needs going forward for the lifetime of the Plan.

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

Duty to Co-operate Reason:

Suggested Modifications:

Inclusion of this site

Comments:

Additional Evidence Link:

Comment ID **HRU785** Site ref (if applicable): **LP0979**

Person ID: **1243169** Name: **Mr Iain Crouch** Organisation:

Agent ID: **1243168** Name: **Mr Iain Crouch** Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Further to my previous comment, I would like to add the following: Many of the sites identified in the Draft Local Plan are not developable as they are either on land with unsuitable topography, or within floodplains. The latest flooding gives evidence to this. New private housing needs to be built in areas close to logical, sustainable access routes to existing shopping centres such as Halifax Town Centre. Certain sites currently proposed (for example sites at Clifton) are not sustainable in this respect. This site is developable now, it doesn't flood and it is capable of providing private housing of a design suitable for Calderdale's needs going forward for the lifetime of the Plan.

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

Duty to Co-operate Reason:

Suggested Modifications:

Inclusion of this site

Comments:

Additional Evidence Link:

Comment ID **HRU786** Site ref (if applicable): **LP0080**

Person ID: **1243169** Name: **Mr Iain Crouch** Organisation:

Agent ID: **1243168** Name: **Mr Iain Crouch** Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Further to my previous comment, I would like to add the following: Many of the sites identified in the Draft Local Plan are not developable as they are either on land with unsuitable topography, or within floodplains. The latest flooding gives evidence to this. New private housing needs to be built in areas close to logical, sustainable access routes to existing shopping centres such as Halifax Town Centre. Certain sites currently proposed (for example sites at Clifton) are not sustainable in this respect. This site is developable now, it doesn't flood and it is capable of providing private housing of a design suitable for Calderdale's needs going forward for the lifetime of the Plan.

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

Duty to Co-operate Reason:

Suggested Modifications:

Inclusion of this site

Comments:

Additional Evidence Link:

Comment ID **HRU788** Site ref (if applicable): **LP0993**

Person ID: **1243169** Name: **Mr Iain Crouch** Organisation:

Agent ID: **1243168** Name: **Mr Iain Crouch** Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Further to my previous comment, I would like to add the following: Many of the sites identified in the Draft Local Plan are not developable as they are either on land with unsuitable topography, or within floodplains. The latest flooding gives evidence to this. New private housing needs to be built in areas close to logical, sustainable access routes to existing shopping centres such as Halifax Town Centre. Certain sites currently proposed (for example sites at Clifton) are not sustainable in this respect. This site is developable now, it doesn't flood and it is capable of providing private housing of a design suitable for Calderdale's needs going forward for the lifetime of the Plan.

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

Duty to Co-operate Reason:

Suggested Modifications:

Inclusion of this site

Comments:

Additional Evidence Link:

Comment ID **HRU789** Site ref (if applicable): **LP1119**

Person ID: **1243169** Name: **Mr Iain Crouch** Organisation:

Agent ID: **1243168** Name: **Mr Iain Crouch** Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Further to my previous comment, I would like to add the following: Many of the sites identified in the Draft Local Plan are not developable as they are either on land with unsuitable topography, or within floodplains. The latest flooding gives evidence to this. New private housing needs to be built in areas close to logical, sustainable access routes to existing shopping centres such as Halifax Town Centre. Certain sites currently proposed (for example sites at Clifton) are not sustainable in this respect. This site is developable now, it doesn't flood and it is capable of providing private housing of a design suitable for Calderdale's needs going forward for the lifetime of the Plan.

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

Duty to Co-operate Reason:

Suggested Modifications:

Inclusion of this site

Comments:

Additional Evidence Link:

Comment ID **HRU790** Site ref (if applicable): **LP1607**

Person ID: **1243169** Name: **Mr Iain Crouch** Organisation:

Agent ID: **1243168** Name: **Mr Iain Crouch** Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Further to my previous comment, I would like to add the following: Many of the sites identified in the Draft Local Plan are not developable as they are either on land with unsuitable topography, or within floodplains. The latest flooding gives evidence to this. New private housing needs to be built in areas close to logical, sustainable access routes to existing shopping centres such as Halifax Town Centre. Certain sites currently proposed (for example sites at Clifton) are not sustainable in this respect. This site is developable now, it doesn't flood and it is capable of providing private housing of a design suitable for Calderdale's needs going forward for the lifetime of the Plan.

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

Duty to Co-operate Reason:

Suggested Modifications:

Inclusion of this site

Comments:

Additional Evidence Link:

Comment ID **HRU791** Site ref (if applicable): **LP0086**

Person ID: **1243169** Name: **Mr Iain Crouch** Organisation:

Agent ID: **1243168** Name: **Mr Iain Crouch** Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Further to my previous comment, I would like to add the following: Many of the sites identified in the Draft Local Plan are not developable as they are either on land with unsuitable topography, or within floodplains. The latest flooding gives evidence to this. New private housing needs to be built in areas close to logical, sustainable access routes to existing shopping centres such as Halifax Town Centre. Certain sites currently proposed (for example sites at Clifton) are not sustainable in this respect. This site is developable now, it doesn't flood and it is capable of providing private housing of a design suitable for Calderdale's needs going forward for the lifetime of the Plan.

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

Duty to Co-operate Reason:

Suggested Modifications:

Inclusion of this site

Comments:

Additional Evidence Link:

Comment ID **HRU878** Site ref (if applicable): **LP0220**

Person ID: **1243589** Name: **Mrs Victoria Porritt** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

I am concerned that this site has been removed from the Local Plan at this stage. Having met with the headteacher of Old Earth School, it is clear that that a housing development on this site will benefit not only the school but the surrounding area. A car park is planned in the first phase of developing the site which will relieve on-street parking on a busy and occasionally dangerous stretch of road. The landowners, headteacher and developer are all keen and appear ready to progress.I appreciate that there are few, if any, ideal development sites available and I urge you to reconsider this one for inclusion. It would be worth contacting the headteacher of Old Earth school to see how developed the plans are. They have support from all three Elland ward councillors.

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 **HRU914** Site ref (if applicable): **LP1089**

Person ID: **1243682** Name: **Mr Paul Hamer** Organisation:

Agent ID: **1129114** Name: **Mr Roger Lee** Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

See attached report

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

Duty to Co-operate Reason:

Suggested Modifications:

Site to be included as a New Housing allocation

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5609288

Comment ID **HRU915** Site ref (if applicable): **LP1089**

Person ID: **1243682** Name: **Mr Paul Hamer** Organisation:

Agent ID: **1129114** Name: **Mr Roger Lee** Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

See attached report

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

Duty to Co-operate Reason:

Suggested Modifications:

Site to be included as a New Housing allocation

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5609289

Comment ID **HRU993** Site ref (if applicable): **LP1570**

Person ID: **1103075** Name: **Mr Sandy Maclure** Organisation:

Agent 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:

We consider the Local Plan in its current state to be sound and complies with the requirements of the future housing needs for Calderdale. We support the filtering of Site LP1570from the Plan and the Council's stated aim to retain as much Green Belt land as possible , supporting biodiversity and wildlife, preventing urban sprawl and the merging of two separate communities. In addition, we feel that the current Plan recognises the Council's aim to avoid building on water-retaining land to reduce flood risks by slowing the flow. Furthermore maintaining the existing drainage structure maintains the stability of the existing properties adjoining the site. (see attached Stability Report). Filtering of Site LP1570 also recognises the existing pressure on the infrastructure , specifically on the local roads and the access to the Site.

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

Duty to Co-operate Reason:

The Plan is compliant in that the information has been made widely available and published in a variety of formats.

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5609658

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:

Document Section: 6 Appendix 1 ; Site Allocations Supporting Information

Representations

Comment ID **HRU1407** Site ref (if applicable): **LP0026**

Person ID: **1243441** Name: **Mr Ross Hallam** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

The addition of site reference 0026 to housing land allocation is fundamentally flawed. The development represents intrusion into the green belt, loss of green space, a threat to bio-diversity and, will contribute to local issues in respect of traffic congestion, flooding and air pollution. These impacts will be significantly exacerbated when considered alongside the other sites that have also been put forward (0177, 0952, 1625) and the cumulative of all these sites represents disproportionate allocation of housing for this area. The justification for which appears to be reliant on the Greetland and Stainland ward, for the purpose of the local plan, being associated with Elland. The links between the two settlements are limited and the physical infrastructure links already strained, with the junctions around West Vale already suffering significant congestion levels. Saddleworth Road itself is unsuitable beyond West Vale to cope with the level of intensification proposed given the nature of the highway there is already a notable highway safety issue given the design of the junctions. The frequency of HGV's using these routes compounds these issues. The opportunity for highway improvements is in practical given the local pattern of development, and any proposed works to the motorway network will do little to alleviate these issues. As it stands the threat to air quality from waiting vehicles at the junctions within West Vale must be a notable threat to resident's wellbeing and, this can only be anticipated to become more severe with the level of development proposed. How this sits alongside the national aims of improving air quality has to be open to question. The requirement for the additional housing at the scale proposed also appears to be based on unrealistic economic predictions that will see historically unprecedented levels of employment being created within the district. Rather than revisit this prediction Calderdale Council have chosen to propose realising valuable green belt land for development. Specifically in regard to site 0026 this green field forms part of the character of the settlement and the density of development proposed will not only erode the green belt, but also the character of the locality and the communities access to green open space. How the level of development proposed can be achieved is also debatable given the noted bio diversity issues, protected trees and flooding issues. The latter being a significant national problem highlighted by recent weather events, but how Calderdale Council can propose to develop to this extent in areas prone to flooding given the recent issues within the borough is surprising to say the least. Of the sites proposed this maybe the least at threat in this regard, but the threat from increasing surface water run off should not be ignored and is unlikely to be addressed by green roofs, and developers will no doubt deem this unviable. The government are seeking to introduce greater protection for bio-diversity when it comes to new development, allocating sensitive sites, and sites that form part of a larger habitat network flies in the face of this. Development of this site will clearly have a detrimental impact on bio-diversity and result in the loss of valuable habitat. The plan can also be argued to fail to meet the objectives of sustainable development

placing too much priority on the economic objectives, which, as noted above, are overly ambitious and unrealistic based on historically unprecedented employment growth, which is being done at the cost of existing communities and the environment.

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 **HRU1414** Site ref (if applicable): **LP0177**

Person ID: **1243441** Name: **Mr Ross Hallam** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

The addition of site reference 0177 to housing land allocation is fundamentally flawed. The development represents intrusion into the green belt, loss of green space, a threat to bio-diversity and, will contribute to local issues in respect of traffic congestion, flooding and air pollution. These impacts will be significantly exacerbated when considered alongside the other sites that have also been put forward (0026, 0952, 1625) and the cumulative of all these sites represents disproportionate allocation of housing for this area. The justification for which appears to be reliant on the Greetland and Stainland ward, for the purpose of the local plan, being associated with Elland. The links between the two settlements are limited and the physical infrastructure links already strained, with the junctions around West Vale already suffering significant congestion levels. Saddleworth Road itself is unsuitable beyond West Vale to cope with the level of intensification proposed given the nature of the highway there is already a notable highway safety issue given the design of the junctions. The frequency of HGV's using these routes compounds these issues. The opportunity for highway improvements is in practical given the local pattern of development, and any proposed works to the motorway network will do little to alleviate these issues. As it stands the threat to air quality from waiting vehicles at the junctions within West Vale must be a notable threat to resident's wellbeing and, this can only be anticipated to become more severe with the level of development proposed. How this sits alongside the national aims of improving air quality has to be open to question. The requirement for the additional housing at the scale proposed also appears to be based on unrealistic economic predictions that will see historically unprecedented levels of employment being created within the district. Rather than revisit this prediction Calderdale Council have chosen to propose realising valuable green belt land for development. Specifically in regard to site 0177 this green field forms part of the character of the settlement and the development proposed will not only erode the green belt, but also the character of the locality and the communities access to green open space. The site has significant flooding

issues that is a prevalent issue within the district at the moment, and not only would development of the site run the risk of being put at risk of flooding, but development is highly likely to exacerbate the issues on neighbouring sites. The flooding problems are compounded by a network of underground springs that do not appear to have been identified within the assessment of the site. Black Brook also represents an area of notable bio-diversity value and the extensive development of this site would clearly conflict with the governments proposed objectives of ensuring that development is not at the cost of bio-diversity. This area of land serves as a valuable community asset as it is an accessible area of green open space which is highly valued. A 10m buffer would do little to mitigate the pressures that the wildlife corridor would face by having a housing estate in such close proximity, which would also compromise its value as part of the wider habitat network which it is currently intrinsic. The plan can also be argued to fail to meet the objectives of sustainable development placing too much priority on the economic objectives, which, as noted above, are overly ambitious and unrealistic based on historically unprecedented employment growth, which is being done at the cost of existing communities and the environment.

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 **HRU1417** Site ref (if applicable): **LP0952**

Person ID: **1243441** Name: **Mr Ross Hallam** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

The addition of site reference 0952 to housing land allocation is fundamentally flawed. The development represents intrusion into the green belt, loss of green space, a threat to bio-diversity and, will contribute to local issues in respect of traffic congestion, flooding and air pollution. These impacts will be significantly exacerbated when considered alongside the other sites that have also been put forward (0026, 0177, 1625) and the cumulative of all these sites represents disproportionate allocation of housing for this area. The justification for which appears to be reliant on the Greetland and Stainland ward, for the purpose of the local plan, being associated with Elland. The links between the two settlements are limited and the physical infrastructure links already strained, with the junctions around West Vale already suffering significant congestion levels. Saddleworth Road itself is unsuitable beyond West Vale to cope with the level of intensification proposed given the nature of the highway there is already a notable highway safety issue given the design of the junctions. The frequency of HGV's using these routes compounds these issues. The opportunity for highway improvements is in practical given the local pattern of development, and any

proposed works to the motorway network will do little to alleviate these issues. As it stands the threat to air quality from waiting vehicles at the junctions within West Vale must be a notable threat to resident's wellbeing and, this can only be anticipated to become more severe with the level of development proposed. How this sits alongside the national aims of improving air quality has to be open to question. The requirement for the additional housing at the scale proposed also appears to be based on unrealistic economic predictions that will see historically unprecedented levels of employment being created within the district. Rather than revisit this prediction Calderdale Council have chosen to propose realising valuable green belt land for development. Specifically in regard to site 0952 this green field forms part of the character of the settlement and the development proposed will not only erode the green belt, but also the character of the locality and the communities access to green open space. The site has notable flooding issues that is a prevalent issue within the district at the moment, and not only would development of the site run the risk of being put at risk of flooding, but development is highly likely to exacerbate the issues on neighbouring sites. The flooding problems are compounded by a network of underground springs that do not appear to have been identified within the assessment of the site. The site also has bio-diversity value and the extensive development of this site would clearly conflict with the governments proposed objectives of ensuring that development is not at the cost of bio-diversity. The plan can also be argued to fail to meet the objectives of sustainable development placing too much priority on the economic objectives, which, as noted above, are overly ambitious and unrealistic based on historically unprecedented employment growth, which is being done at the cost of existing communities and the environment.

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 **HRU1421** Site ref (if applicable): **LP1625**

Person ID: **1243441** Name: **Mr Ross Hallam** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

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

Duty to Co-operate Reason:

The addition of site reference 1625 to housing land allocation is fundamentally flawed. The development

represents intrusion into the green belt, loss of green space, a threat to bio-diversity and, will contribute to local issues in respect of traffic congestion, flooding and air pollution. These impacts will be significantly exacerbated when considered alongside the other sites that have also been put forward (0026, 0177, 0952) and the cumulative of all these sites represents disproportionate allocation of housing for this area. The justification for which appears to be reliant on the Greetland and Stainland ward, for the purpose of the local plan, being associated with Elland. The links between the two settlements are limited and the physical infrastructure links already strained, with the junctions around West Vale already suffering significant congestion levels. Saddleworth Road itself is unsuitable beyond West Vale to cope with the level of intensification proposed given the nature of the highway there is already a notable highway safety issue given the design of the junctions. The frequency of HGV's using these routes compounds these issues. The opportunity for highway improvements is in practical given the local pattern of development, and any proposed works to the motorway network will do little to alleviate these issues. As it stands the threat to air quality from waiting vehicles at the junctions within West Vale must be a notable threat to resident's wellbeing and, this can only be anticipated to become more severe with the level of development proposed. How this sits alongside the national aims of improving air quality has to be open to question. The requirement for the additional housing at the scale proposed also appears to be based on unrealistic economic predictions that will see historically unprecedented levels of employment being created within the district. Rather than revisit this prediction Calderdale Council have chosen to propose realising valuable green belt land for development. Specifically in regard to site 0952 this green field forms part of the character of the settlement and the development proposed will not only erode the green belt, but also the character of the locality and the communities access to green open space. The site has notable flooding issues that is a prevalent issue within the district at the moment, and not only would development of the site run the risk of being put at risk of flooding, but development is highly likely to exacerbate the issues on neighbouring sites. The flooding problems are compounded by a network of underground springs that do not appear to have been identified within the assessment of the site. The site also has bio-diversity value and the extensive development of this site would clearly conflict with the governments proposed objectives of ensuring that development is not at the cost of bio-diversity. The plan can also be argued to fail to meet the objectives of sustainable development placing too much priority on the economic objectives, which, as noted above, are overly ambitious and unrealistic based on historically unprecedented employment growth, which is being done at the cost of existing communities and the environment.

Suggested Modifications:

Comments:

Additional Evidence Link:

Main Issues and Council Response

Legal Compliance

Main Issues:

Council's Response:

Test of Soundness

Main Issues:

1. Site specific issues

Council's Response:

1. Site specific issues addressed under each of the individual sites.

Duty to Co-operate

Main Issues:

Council's Response:

Suggested Modifications

Council's Response:

Document Section: Map 1.1 Calderdale Local Plan Areas

Representations

Comment ID **HRU8** Site ref (if applicable):

Person ID: **1117915** Name: **Mr Neil Moore** 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:

My comments are not necessary about the plan in its entirety, but is specific to an area of land opposite land Ref LP1033 - land off Toothill Bank I am the owner of the land twixt Toothill Bank and Long Ridge (postcode HD6 3EZ / HD6 3RZ) The land in question boundaries up against 3No (three) previous successful planning applications 1. 80/02843/OUT & 81/00215/RES 37 Toothill Bank Rastrick Brighouse HD6 3EZ 2. 92/00604 5No Detached dwellings on land off Long Ridge HD6 3RZ 3. 01/00341/FUL & 03/01847/FUL land at 37 Toothill Bank Rastrick Brighouse HD6 3EZ We fully understand the GN4 policy (landscaping / trees) and this was taken into consideration with the successful development of the 5No detached properties passed back in 1992 and can still clearly be seen on site today that their remains significant woodland in and around the built properties. My comment and request focuses on the land adjacent 37 Toothill Bank and that we have drafted a anumber of schemes in order to provide additional dwellings, whilst not only maintaining the landscaped area but also enhancing the area by discreetly blending in any new dwellings without major loss to the existing landscape and addressing the need to maintain some open space and additional tree planting around the land in question. I would welcome your review of this land in order to allocate this has additional housing site so that we can engage with Calderdale Council and work in collaboration to provide an housing scheme both appropriate for the land and area and also acceptable to Calderdale Council I look forward to your review and response Many thanks

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:

1. Non Local Plan Issues

Council's Response:

1. Non Local Plan Issues

Duty to Co-operate

Main Issues:

Council's Response:

Suggested Modifications

Council's Response:

Document Section: 7 Brighouse Additional Mixed Use Sites

Representations

Comment ID **HRU1842** Site ref (if applicable):

Person ID: **1182803** Name: **Miss Sally Turgoose** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

I support building on brown field sites and feel this should be an absolute priority to protect our already threatened countryside. In that respect developing the site at Millroyd Street where the 200 new houses are proposed seems like a positive step but the points above about infrastructure within Brighouse are still very relevant. It also has some existing businesses such as Rokt and Millers Bar who have been working hard to develop and bring business to the area and I would want these to be protected. Also, as has been demonstrated recently it is subject to flooding, in fact, recent events have shown the overall threat that flooding poses in Brighouse. The proposed Garden Suburbs particularly the one at Woodhouse will increase the flood threat further, as what I suspect will happen is that water that would previously have been absorbed into the agricultural land will instead run downhill into the town centre and increase the flood threat. My other challenge linked to this is to ask if there are other brown field sites that should be considered in Calderdale and which have been ignored because of the relative ease of building on a blank canvas that the countryside offers and which I strongly object to? I am unsure what sites have been considered and rejected.

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

Duty to Co-operate Reason:

Suggested Modifications:

I support the development of brownfield sites over green field so in this respect and with due consideration to existing businesses, this is a better proposal particularly if it reduces the need to build on green belt land at the Woodhouse Garden Suburb (LP1451) but infrastructure issues need to be considered as the area proposed is a significant traffic bottleneck.

Comments:

Additional Evidence Link:

Comment ID **HRU2159** 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?: **No**

Sound Reason:

Calderdale council need to review their policy of building a disproportionate number of houses in Brighouse and surrounding area. Why? Flooding ; Brighouse has been flooded twice in the past five years. Storm Ciara caused misery not only to residents and business community in centre of Brighouse, but also on high lying ground in places such as Rastrick. Flooding is not only caused by natural weather events such as heavy rainfall and thunderstorms over a short period but also by badly thought out development and planning issues such as building on land in a way that prevents rainfall from draining away naturally i.e. thousands of houses, that are impermeable to water, increasing the risk of flooding from rainwater runoff. Brighouse is at the bottom of a valley surround by fields and trees which naturally soak up water. Remove the natural barriers and the council will increase the risk of Brighouse flooding again in the near future. Can you afford to take this risk given that it is also predicted that climate change will increase the risk of flooding in the UK. Air quality - Air pollution is the biggest environmental threat to health in the UK, with between 28,000 and 36,000 deaths a year attributed to long-term exposure. There is strong evidence that air pollution causes the development of coronary heart disease, stroke, respiratory disease and lung cancer, and exacerbates asthma. The number of cars driving through Brighouse will increase resulting in deterioration of air quality. Add to this the removal of hundreds of trees, nature's own air purifiers, and our children will presented with some of the most toxic air in the country. Calder Council creating a better environment for everyone, especially our children, not destroying it. The government want local authorities to take steps to improve air quality boosting investment in clean public transport to improve health and planning new developments so people aren't close to highly polluting roads, they even recommend planting hedges and trees to screen against pollutants when planning new infrastructure. Excessive development is also taking place throughout Kirklees, much of it, strangely enough, adjacent to the M62. Flooding! Air pollution! Need I say more! Congestion on our roads. Traffic through Brighouse is already at a standstill at peak time (engines ticking-over adding to air pollution) turning short journeys into marathons. Travelling just half a mile regularly taking more than 45 minutes. With no new infrastructure in place this can only get worse. Residents living along busy roads already take their lives in their hands when try to cross the road or get in or out of cars. How much can it get? Well far worse if this overwhelming development takes place. Who is the new housing for? Calderdale residents or for those working and, at the moment, living in Leeds and Manchester. I can't imagine that everyone in need of housing in Calderdale wants to live in Brighouse, so it must be the later! Living in Brighouse but still working in Leeds or Manchester. Not exactly environmentally friendly or and likely to add anything to the local economy. People working in Leeds who decide to relocate to Brighouse are in for a shock. The M62 going to Leeds is already at a stand-still at peak times. Unoccupied housing should be recommissioned, and brownfield sites built on before thousands of houses, many of beyond the reach of Calderdale residents, cover every inch of green in the Brighouse area. Calderdale Council need to start thinking more creatively in order to protect the environment and protect our children's future health.

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 **HRU2188** Site ref (if applicable):

Person ID: **1118404** Name: **Mr Andy Speck** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

My objections and comments are detailed below. Sections 4, 5.3 and 7. Congestion resulting from an increased population not working in Brighouse. The majority of the residents for the 5000 new houses will not be employed in Brighouse and therefore will be commuting, putting a significant pressure on the existing road and rail infrastructure, both of which are at capacity. Therefore congestion and pollution will increase, contradicting the councils climate change and environment policies and objectives. For example, most days of the week, including Saturdays, the queue on Huddersfield road is back into Kirklees. The noise and emissions is significant, even the move to electrification won't help as there are significant trucks and buses were electrification isn't an option. Green belt spaces allow for air movement and distribution and dilution of fumes. Building houses and roads on green belt land not only increases exhaust fumes from the vehicles accessing these houses but also reduces air movement and dilution of fumes , meaning both existing residents and new residents will be subjected to poorer air quality with the associated detrimental impact on health. Retaining green belt land for Brighouse residents will ensure a healthy population and prevent the loss of habitat and valuable green space. Policy on Climate Change. Building on green belt land reduces the available vegetation that captures CO2. This appears to be at odds with the councils stated policy on Climate Change. Brown field sites such as Milroyd Street are better options for house building. Flood risk. The flood risk in Brighouse, recently tested and found wanting, is a major concern to the region. Converting a large area of green belt land such as the Woodhouse Garden Suburb into roads , houses and driveways will reduce the ability of the land to soak up water and is highly likely to increase the volume and flow of water draining into the canal and River Calder in Brighouse town centre , increasing the flood risk. Also once the flood defences have been completed in Hebden Bridge and Mytholmroyd this could also move the flood risk further down the Calder Valley into Brighouse. Limiting building to brown field land should be the Council's strategy. Whilst I agree that Brighouse should accommodate a degree of increased housing , the amount proposed is totally disproportionate to the size of the town and its infrastructure , will add to the already unacceptable congestion on all main roads , will worsen air quality for its residents and increase flood risk. The council should reduce the number of houses planned to be built in Brighouse and allocate in more appropriate areas of Calderdale. The housing in Brighouse should be limited to brownfield sites and not green belt land such as the Woodhouse Garden Suburb. This will reduce the impact on air quality , congestion and flooding and make Brighouse a more pleasant place to live.

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 **HRU2189** Site ref (if applicable):

Person ID: **1104200** Name: **Mrs Jennifer Rowlands** 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:

2.additional sites .Ascalderdale has decided to increase housing plans rather than take the option of reducing the economic forcast- by some miracle all these brown field sites have come to light. When the initial proposal for destroying our green belt in favour of building a -“garden village"□above Brighouse at clifton,was outlined in the local plan it was stated that there were no brownfield sites available and yet now to suit the councils needs they have beenfound. There seems to be no plans to provide the infrastructure to support all these extra residents. There seems to be no plans toincrease schools, doctors surgeries, dentists etc to cope with the higher levels of residents either. 3 sustainability.I feel the environmental effects of the proposed plan are astronomical, there is no noticeable plan for infrastructure to support the massiveincrease in traffic nor to support the extra people who will be living in the Brighouse area.the past two weekends have shown the dire consequences for Brighouse and Elland of heavy rain resulting in floods.this is only going to increase if the green belt above Brighouse is destroyed and fields concreted over. As it is at the moment the rainwaterrun off is massive after a downpour downjayhouse Lane resulting in huge rises in the water level of the beck. Last weekend the 9 th Feb it was running at a record 6 feet deep see attached videos.In the 38 years that I have lived in clifton I have not seen as much flooding as in the last 4 years, we are told this is due to global warming, so it is not a problem that is going to go away. Unless the council can in some way reduce the risk then the development is not sustainable. Also the rainwater pours out of the bottom of the proposed enterprise zone site, resulting in Wakefield road being flooded and closed to traffic- how then are the businesses going to access junction 25 onto the m62? Especially as it would appear that junction 24a is no longer an affordable option traffic will have to divert up highmoor lane and through scholes to access the motorway from junction 26 chain bar, and visa versa. Another environmental concern is air pollution Brighouse already had too high levels of pollution in line with government recommendations, surely all the extra traffic from the sites and the enterprise zone is going to make Brighouse a dangerous place to live with massive risks to health. as a resident with a previous lung condition I find this very worrying for myself and future generations. 4 Habitat. Iwalked up jayhouse lane one morning last week , as do many residents of clifton and Brighouse, and already I heard the curlews calling, a woodpecker drumming on a nearby tree and two deer grazing in the field....this is

what we should be protecting not destroying with constant building and created urban sprawl!

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/5634631 ; http://calderdale-consult.objective.co.uk/file/5634630

Comment ID **HRU2273** Site ref (if applicable):

Person ID: **959426** Name: **A Dowson** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

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/5635399

Comment ID **HRU397** Site ref (if applicable):

Person ID: **1136528** Name: **Ms Marjorie Binns** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

I am strongly opposed to the development of 5,000 houses in Brighouse and Rastrick My opposition is based on the following Brighouse has 2 small bridges, NOT built with today's traffic in mind. Everyone leaving or entering from Brighouse has to get there via these bridges. The traffic congestion now is absolutely horrendous. It can take 45 mins to get from Crowtrees Lane into Brighouse now! There is already a massive housing project taking place at the bottom of Thornhill rd which will see an increase to this already overpowering situation Doctors surgeries are at capacity with long waits to see a doctor. Many surgeries are reviewing boundaries and shrinking them to cope with people on the lists. Schools are not coping with the numbers of children now. It us very difficult to get a child into a local school, especially primary, you practically have to live within half a mile of the school. Children aged 5 would have to be bused out of the cards. This is unacceptable. The green fields where residents can wander and enjoy have almost vanished. The area is losing its identity, it's green walks, it's play areas, we are becoming a superb of Halifax, you are stealing our identity and affecting the way we can live and enjoy our heritage. Roads, environment, health, infrastructure should be given the priority it needs. We are drowning Please reject this plan. Not because we are against new housing but because of the truly adverse effect it would have on all including people living in these proposed new houses

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU639** Site ref (if applicable): **LP0573**

Person ID: **1106506** Name: **Mr Kelvin Lawton** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

I do not wish to comment on compliance.

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

Sound Reason:

Having made numerous comments on previous consultation exercises, I believe that the whole consultation is a sham and Calderdale Council has a pre determined policy which will not change. I am amazed at this proposal. Development on brown field sites is to be applauded but the location of this site is beyond belief. It is an area where traffic congestion is currently atrocious and there are still no realistic proposals for any relief schemes for central Brighouse. Secondly it is an area located between the river Calder and the canal which has flooded in the past. In the light of the current debate and danger of

flooding, how can this be a serious and sound proposal.?

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

Duty to Co-operate Reason:

I do not wish to comment on this aspect of the Plan.

Suggested Modifications:

No comment

Comments:

Additional Evidence Link:

Comment ID **HRU640** Site ref (if applicable):

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

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

It appears to me that proposed further changes have yet again not gone through correct public consultation but is a response to the inspectors comments , regarding imbalance of stats..'re growth and housing needed..

Do you consider the plan to be Sound?:

Sound Reason:

While I understand the need for additional housing I have major concerns regarding the impact of proposed plans for my area ...Brighouse Wood house lane and the additional proposals for brighouse centre /canal side. Proposals seem to be completely disproportionate to other Calderdale areas and do not take into account the impact on current local resources and traffic issues .. Given permission has already been given to the Clifton retail development and this will have impact on local traffic , this should now be taken into account for further development. I have recently provided feedback on calderdale eco planning , where it makes reference to retaining rural and green belt areas which is contradictory to what is proposed for Woodhouse .Additional traffic will inevitably increase pollution in my environment.. Further concern of impact of development on recent flooding in Brighouse centre ,including proposed brownfield areas that have now flooded twice in last 12 months ..I would add if this brownfield site is deemed suitable , why was it originally not included .I would certainly agree the area is in need if some sort of action ..but may now need to be part if some form of flood prevention . I struggle to comprehend that previous traffic consultations of Woodhouse area are accurate, given the recurrent traffic issues during rush hour traffic periods when Woodhouse lane becomes a rat run regardless of oomph zones, or at school start and finish ...At night driving throughout the estate with numerous parked cars is often hazourdous...and entry for emergency vehicles impeded.. There is lack of clarity 're actual plots of land purchased at Woodhouse or entry roads ..when where to be built.Local plan suggested this had been completed but in fact this is not yet the case .. I object to the disproportionate number of homes proposed at Woodhouse and the overall impact they would have, on eco, roads , pollution, resources etc ..

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU647** Site ref (if applicable): **LP1078**

Person ID: **1128984** Name: **Mr Gary Hume** 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:

you are going to build houses on the old badger hill cricket ground and surrounding fields behind new hey road.. are you going to stop this flooding in my garden and house first.. take all the fields and it will be much worse. See attached photographs

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/5606434

Main Issues and Council Response

Legal Compliance

Main Issues:

1. Proposed further changes have not gone through correct public consultation.

Council's Response:

1. Extensive and inclusive consultation has been carried out throughout all stages of the Local Plan

preparation process in accordance with the Council's adopted Statement of Community Involvement and is detailed in the Consultation Statement (Regulation 22).

Test of Soundness

Main Issues:

1. Disproportionate amount of development in Brighouse compared to other parts of Calderdale. Specific objection to the disproportionate number of homes proposed at Woodhouse and the overall impact they will have.

2. The loss of rural areas and green belt is contradictory to the aims and objectives of the Garden Suburbs.

3. Local road network, specifically congestion.

4. Increased risk of flooding.

5. Master planning is required at the Woodhouse site.

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

Council's Response:

1. The justification for the garden suburbs is detailed in Evidence Document EV40 – Justification for the Garden Suburbs (2018).
The paper to the Local Plan Working Party 17th August 2016 attached to evidence document EV09 considers the distribution of development throughout the Local Plan process. The Council considers its distribution of development to be justified and supportive of sustainable development.

2. The justification for the garden suburbs is detailed in Evidence Document EV40 – Justification for the Garden Suburbs (2018).

3. The Council considers that the evidence submitted supports and justifies the content of the Local Plan. In addition, the Transport Assessment in any planning application would need to assess impact on local road network.

4. The NPPF makes it clear that 'inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere'. Supported by the Calder Catchment Strategic Flood Risk Assessment 2016 (SFRA), the Local Plan is focused upon managing flood risk from all sources and applying a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change.

5. The Local Plan identifies a number of key sites and locations which are essential to the delivery of the Local Plan to include the identified Garden Suburbs at Brighouse. The Local Plan is seeking quality designs for all types of development and to help in achieving this master-planning is a useful tool. Master-plans provide design guidance for areas that are likely to change. They will describe and map the overall vision and concept for the proposed development including proposed land uses, urban design, landscaping, built form, movement and access and infrastructure. They will also set out the intended implementation and phasing of development. The Council expects developers of strategic sites to follow the principles

associated with master-planning.

6. The Infrastructure Delivery Plan is a compendium of projected infrastructure provision and it helps to ensure that this infrastructure is provided in a timely manner and in a coordinated and sustainable way. It sets out the infrastructure that will support the level of development that is proposed in the Calderdale Local Plan. The IDP is a living document, updated on at least a yearly basis and contains a chapter on healthcare, education provision, utilities and public transport.

Duty to Co-operate

Main Issues:

Council's Response:

Suggested Modifications

Council's Response:

Document Section: Site number LP0573 Land adjacent Mill Royd Street, Mill Royd Str

Representations

Comment ID **HRU1578** Site ref (if applicable): **LP0573**

Person ID: **1244135** Name: **Mr John Duckworth** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

I disagree with the proposed changes regarding the addition of the proposed extra housing at Mill Royd Street and Birds Royd Lane. I object to these two additions as they have not been correctly considered. In recent weeks we have experiencedsevere flooding in the Calder valley. Taking in to consideration the already proposed developments in Woodhouse and Clifton. These proposals will only add to the current issues of flooding in Brighouse. It is unsound planning to add additional houses in areasthat are already prone to flooding. The addition of Clifton and Woodhouse sites will only compound this potential flooding issue. Today, Sunday 23 rd Feb, The Secretary of State for the environment said on the Andrew Marr show, that current planning proposals should be reconsidered and re-examined where there is potential for these plans to increase the risk of flooding. Not only is there a potential increase in the risk of flooding but the current traffic issues in Brighouse can only be made worse by the extra housing proposals over and above the Clifton and Woodhouse plans. I work in South Leeds and I can travel quicker from my place of work to J25 than getting from J25 to Daisy Road. The road infrastructure cannot cope with current levels. How does the council believe that the proposed Local Plan will improve the situation? The geography of the valley does not lend itself to the required changes. Recent flooding at the roundabout where Lidl are situated can only become worse in the future creating massive transport infrastructure issues. The proposed use of Green Belt land at Clifton and Brighouse can only make the additional proposed houses more prone to flooding, surely the council should be forced to look at available brown field sites before concreting over our disappearing and valuable green belt land. Regarding traffic, Brighouse cannot cope as it is. The completely unbalanced approach towards the housing allocation in Brighouse, exaggerated by the extra proposed 200 house can only describe this situation as potential permanent gridlock for Brighouse. Making Calderdale Councils declaration of a climate emergency and it's proposals for improved air quality, quite frankly, a joke! Calderdale Council believe that the addition of homes will increase employment. In reality they will only increase the position of Brighouse as a commuter town for people working in Leeds and Manchester further compamising the desired improvement of our climate situation. The council believe that the current infrastructure can cope with the additions. In reality this is wrong. Trains cannot cope, the roads cannot cope and the proposed employment opportunities will not meet the requirements of the proposed non-affordable housing being proposed. The complete Local Plan needs to be re-examined from flooding, the proposed housing numbers, employment numbers, traffic planning and M62 capacity constraints. It then needs to re-submitted to the Secretary of Sate where I am confident that sense will prevail and the whole plan will be rejected.

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

Duty to Co-operate Reason:

Suggested Modifications:

The Local Plan is unsound and should be completely re-examined.

Comments:

Additional Evidence Link:

Comment ID **HRU1776** Site ref (if applicable): **LP0573**

Person ID: **1183585** Name: **Mr Regan Dickenson** 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:

With regard to the Brighouse Additional Mixed use site, the key issues surrounding its development will focus on viability with regard to the flood risk: Mill Royd Street was flooded again at the Bridge End end on the weekend of February 8/9 2020. The other factor to consider is the importance of keeping Mill Royd Street itself as part of any development: it is a vital access road and its loss would adversely affect the town already suffering from heightened problems associated with inadequate infrastructure including traffic congestion on an ongoing basis, made worse when the M62 breaks down yet again: Brighouse is one of the areas monitored for Air Quality Management. However, if sensitively handled with regard to existing heritage buildings and the issue listed above, this site has the potential to be an asset to the town. The wider problems of the disproportionate proposed development of Brighouse and the lack of infrastructure development, including no clear plan for the Railway Station that the Council have been able to provide to me, have been well covered by other comments already made I would like to note at this time that the consultation is disappointingly limited to considering increased housing provision, rather than considering less economic development in an area with already near full employment.

Comments:

Additional Evidence Link:

Comment ID **HRU1792** Site ref (if applicable):

Person ID: **1242640** Name: **Mr James Firth** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

See attachment

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610088

Comment ID **HRU1800** Site ref (if applicable):

Person ID: **1116208** Name: **Mrs Carol French Deol** 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 FOR FULL REPRESENTATION

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/5635273

Comment ID **HRU1866** Site ref (if applicable): **LP0573**

Person ID: **1246253** Name: **Mr Fraser Tomlinson** Organisation: **Environment Agency**

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:

LP0573 - Land adjacent Mill Royd Street Site specific Hydraulic Modelling and FRA required. No more vulnerable or highly vulnerable uses on the ground floor. Emergency Access and egress plans must be provided to the LPA for consideration and agreement (See attachment).

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/5628156

Comment ID **HRU1898** Site ref (if applicable): **LP0573**

Person ID: **1242122** Name: **Mrs Debbie Burke** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

The development on Site LP0573 is more preferable because it is a brown field site although it has been flooded twice recently Boxing Day 2015 and 9 th February 2020. Although it would still be an addition to the current traffic issues and Brighouse would lose a car park. Mill Royd Street has problems due to the traffic light sequencing as the A641 traffic flow is given priority. There is no information as to what will happen to the businesses currently operating in this area who provide appreciated facilities and services to the local community.

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 **HRU1929** Site ref (if applicable):

Person ID: **959662** Name: **Mr Michael Rooney** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

I agree that the area near to the old swimming pool (LP0573) needs regenerating to include houses, shops etc as it has been an eyesore for many years.

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 **HRU1963** Site ref (if applicable):

Person ID: **1246511** Name: **Professor Ron Hill** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

I object to:- an additional 200 homes being allocated in Brighouse on site LP0573 (Millroyd Street) Reasons Too much housing development in Brighouse Would add to traffic issues without any clear improvements to our road network, parking provision within Brighouse Town Centre, amenities such as schools, GPs centre. Mill Royd Street is a bottleneck - traffic builds up at both ends of the street due to traffic light sequencing (preference given to Huddersfield Road traffic flow) and volume of traffic on Briggate. Will be a loss of public parking May impact on existing businesses which provide valuable facilities and services to the town. No indication of what would happen to existing businesses Increased risk of flooding within in town and on local businesses along the River Calder Will impact on wildlife along the river and canal

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

Duty to Co-operate Reason:

Suggested Modifications:

This is a brownfield site so it would be better to develop this rather than green belt land. If an appropriate solution can be found that retains existing uses, would prefer the site to be allocated rather than releasing green belt land at Woodhouse Garden Suburb (LP1451)

Comments:

Additional Evidence Link:

Comment ID **HRU2016** 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 REPRESENTAION The site is predominantly Flood Zone 3 and should not be allocated when there are other sequentially preferable sites available. The site also contains multiple landowners offering established services, making it very difficult to tie up landowners to deliver comprehensive development.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

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

Comment ID **HRU2066** Site ref (if applicable): **LP0573**

Person ID: **844298** Name: **Cllr Howard Blagbrough** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

I wish to comment on the additional houses planned ; Site Number: LP0573 As previously stated I am not against additional house, however I am against additional houses without the necessary infrastructure. This particular site is situated on one of the main access routes into the town centre, at the moment the access, which would go through the middle of the site is serviced by a weight restricted bridge which is not adequate for additional houses. Infrastructure is not just about new roads, bridges, schools and doctors surgeries, thought need to be given to other things such as the water network, sewage and drainage systems, the amount of electricity and gas required, money for adequate flood defences. If we are to concrete over large area, this has a direct impact on the additional water flow ; where is the water to go. Given the large number of flooding incidents in the area, not only in 2012, 2015 but now 2020, Calderdale should apply and should be given special dispensation to actually reduce the number of houses required. This particular site was affected in both the 2015 and 2020 floods and I therefore do not consider this addition to be sound. As previous stated, I do not believe that requirement to provide so many houses in the Brighouse area has been thought through logically, adding this particular site in an already congested area makes no sense whatsoever. I am not convinced that the employments figures which are now being proposed are achievable within the timescale provided, I would therefore urge the inspectorate to reject this plan and request a reduction in the number of houses required. I have strongly objected to the original proposal, I now have greater concern with amended scheme put forward, which in my view now places residents and communities at risk especially in view of the recent flooding. The council should be considering the long term strategic impact and rather than have to spend vast amounts of public money in the future on additional flood defences, they should be seriously looking at reducing this risk in the first place by reducing the number of homes in the plan and amend the employment figures to reflect a realistic figure. The additional site included in the Brighouse area would lead to an immediate loss of a public car park. I am a Board Director of the Brighouse Improvement District, and I can assure you that one of the aims for this board is to continue with the already successful markets, to ensure that we have large number of tourists visit the area. The loss of this car park would have a direct impact on these markets. On a daily basis, this park is used for local businesses and people visiting Brighouse. If the plan is to build a new bridge, then there would be potentially the loss of two car parks The impact of including this site would have a negative impact on the local successful businesses currently operating, including Rokt (and the outside climbing frame) and Millers Bar to mention a few. I was very disappointed to hear that one key business person had not been consulted about these plans. When I raised a question at the recent BID meeting, it would appear that the council have failed to consult or communicate with the business community. The council are therefore unaware of any plans these businesses have for the future. In view

of this, I would question further the employment figures which this plan is based on. Ironically the other week, I served on the planning committee ; one particular application was refused as it was in the greenbelt ; even though this was in effect an extension on existing site ; I am struggling to understand how we are going to pass so many houses proposed on Greenbelt Land. Another application was heard with the addition of 12 houses ; the developer was not required to make improvements to the existing road structure ; this is something of concern on a bigger picture. I am concerned that there has been no provision within any plan put forward to say how the existing structure of the planning department would manage with the large number of projected applications coming forward. In it current format the department is under a great deal of pressure and fails on a regular basis to meet ; clearly, some of these deadlines are out of their control, however the adoption and implementation of any such local plan would add addition pressure on this department. I would suggest that serious consideration be given to refuse this plan and the additional quantity of the proposed development and actually consider reducing the numbers vastly and request special dispensation from the inspector given the severe impact of flooding in the Calder Valley. As previously state on numerous times, I am not against houses being built, however I strongly object to any additional plans with the necessary fully laid out plans for the infrastructure.

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 **HRU2115** Site ref (if applicable): **LP0573**

Person ID: **954837** Name: **Ms Catherine Kirk** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

Site LP0573 Mill Royd Street Brighouse I object to an additional 200 homes on this new site because it is an area at risk of rapid onset flooding, this has been the case in 2015 and 2020. I propose that it makes sense to develop this brown field site in preference to any green field sites in Brighouse and Rastrick in a resilient manner to benefit the general economy of the town. For example: public parking to be expanded as existing local businesses already on this site - ROKT, Millers Bar - rely on this facility. Office, retail or leisure use at first floor and above would make any development resilient to flooding and make a contribution towards employment targets in Calderdale. The site is also close enough to Brighouse rail station to provide additional parking for rail users (at times of no flood risk) to help meet the borough's climate emergency objectives of reducing private car use. This site has the potential to enhance Brighouse

town centre. This consultation covers changes to the Housing Requirement in the Calderdale Local Plan. On this subject (Section 4) I would like to object to the overall increase in the number of houses now proposed by the Calderdale Local Plan. Following the flooding events in 2012, 2015 and 2020, surely the Calder Valley is a special case which requires a joined up strategy for new development (resilient only). We need a holistic plan which includes infrastructure improvements appropriate to the challenging geography and topography of the valley and flood prevention measures alongside flood defences. The Calderdale Local Plan is too narrow in its scope to cover all these strategic objectives which have now become urgent, immediate emergencies as a result of the regularity of flood events in a unique steep sided valley. Priorities have to be changed from increasing housing numbers to meet the Council's ambition of achieving the highest levels of employment growth. While some housing development is inevitable, it should be realistically spread across the borough with minimal impact on green belt, woodland and the remaining green spaces which absorb and slow the water run off from regular intense storms. As a Brighouse resident, I am concerned that the town has been allocated 35% of the total homes proposed. This is in excess of Halifax, the largest town in the area, which is also not in a flood zone. If over 5,000 homes are built in Brighouse and Rastrick, the flood risk will dramatically increase and could be potentially catastrophic for the town centre in contrast with today's flood risk. The flood prevention schemes in the Upper Valley when fully functioning could regularly force rapid onset flood water downstream to Brighouse (indicated by the severity of the 2020 floods). Add to this the run off from new housing development on all sides of the town and in Elland and low onset flooding will impact the town far more than at present. Why change an area which is only just able to cope with run off? For example: local springs appear everywhere during and after high rainfall. Streams and becks turn to rivers, ponds appear in fields and in dips in the road, water flows over roads and through cellars and garages. This occurs in my property and I am located on a steep hill. Looking at all the new and existing proposed housing sites in the lower Calder Valley, I am extremely concerned that a lack of approved, funded infrastructure improvements will lead to the following outcomes: - gridlocked traffic generating harmful carbon emissions on a regular basis and reducing air quality - public services including schools, GPs and rail services being overwhelmed by huge increases in population relative to other towns - sewage system unable to cope particularly at times of flooding events - Brighouse becoming a commuter town as thousands of residents leave to attend employment in neighbouring towns, cities and boroughs - M62 congestion overwhelming the smart motorway system and leading to stationary traffic on a daily basis in Brighouse - increases in respiratory problems for residents especially asthma patients like myself, children, cyclists and pedestrians - increase in school run traffic as residents are bottle-necked at the limited river crossing points - economic impact of delayed logistics, deliveries and employees on local businesses throughout Brighouse, Rastrick and Elland. Calderdale Council has acknowledged the climate emergency and the above impacts are all making the situation worse. It is preferable to focus on flood prevention, reducing employment targets to realistic achievable levels and distributing new housing development (resilient only) more fairly across the borough. Thank you for including my comments in the consultation.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2119** Site ref (if applicable): **LP0573**

Person ID: **1139521** Name: **Cllr Sophie Whittaker** Organisation: **Councillor**

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:

Section 5.3 & 7 I object to proposed site LP0573 (Millroyd Street) for an additional 200 new dwellings. Many of the reasons stated in the previous two sections of my comments apply to this site, but namely: The site would add to overdevelopment in the area. It would aggravate existing issues with traffic volumes and movement around the Town Centre and roads linked between Brighouse and Rastrick. Mill Royd Street is a bottleneck as it is and further congestion would add to ongoing traffic issues on Briggate and Mill Royd Street leading on to Huddersfield Road. There would be a loss of public parking, which is also used to serve neighbouring businesses such as the popular and high contributor to the local economy, Rokt, and public house and restaurant, Millers. Both these businesses attract visitors near and far by providing valuable and, particularly in the case of Rokt, unique facilities which make Brighouse a distinctive place to visit. There is also no mention or indication of the impact this development would have on these businesses, nor the businesses located in/on Mill Royd Mill. It is in a high flood risk area with further development of this site increasing this risk in and around the Town Centre vicinity. The impact on wildlife along the river and canal needs to be carefully assessed due to the wider and potentially damaging impact further along the river/canal channels.

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 **HRU2161** Site ref (if applicable):

Person ID: **954777** Name: **Av Singh** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

I understand that this site has been added back into the calculations, it is good that this is a regen project & not a green field site, but this should not be at the expense of losing already valuable parking, or take land from Rokt / Millers. If parking will be affected, and the '000's of homes are built in the area, then where will they park? Rokt brings many visitors into the town and contributes massively to the local economy. My family regularly use the facilities as do many of our friends. Don't damage one to the few things that brings Â£Â£Â£'s into the area.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2167** Site ref (if applicable): **573**

Person ID: **1183705** Name: **Mrs Adele Hannah** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

I strongly object to an additional 200 homes being allocated in Brighouse on site LP0573 (Millroyd Street). To even think about building 200 homes on this site after recent flooding and subsequent disruption seems strange, but coupled with the existing uses of the site and the potential loss of income to Brighouse it seems ridiculous. Given that this is a brownfield site, it would be better to develop this rather than other green belt land identified, but such regeneration must not be at the risk of: a loss of public parking, negative impact on existing businesses that have brought much needed income and footfall to Brighouse (such as Rokt, Millers, Assembly Rooms, Hartleys etc.) negative impact on wildlife along the river and canal an increase of flooding Mill Royd Street is already a busy area for vehicles and often a bottleneck with traffic building up at both ends of the street. I have not seen anything that gives proper consideration to improvements to the road network or parking provision within Brighouse Town Centre, affecting amenities such as schools, GP', dentists and also traders. If an appropriate solution can be found that retains existing uses, I would prefer the site to be allocated rather than releasing green belt land at Woodhouse Garden Suburb (LP1451)

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 **HRU2184** Site ref (if applicable):

Person ID: **1243954** Name: **Mr Edward Drury** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

I addition to the above, I object to the additional 200 homes being allocated in Brighouse on site LP0573 (Millroyd Street). "¢ This too is located in a high flood risk area which if developed could have severe impacts downstream for my business. This has not been tested yet and needs to be fully integrated into the modelling that is being undertaken. "¢ It would add to traffic issues in the centre which impact on access for my workers (can you add why). Mill Royd Street is a bottleneck. Traffic builds up significantly at both ends of the street due to traffic light sequencing (preference being given to Huddersfield Road traffic flow) and the volume of traffic on Briggate. "¢ These issues would need to be resolved in any scheme

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/5634612

Comment ID **HRU2227** Site ref (if applicable):

Person ID: **1246930** Name: **Woodhouse Residents Association** Organisation: **Woodhouse Residents Association**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

See attachment

Do you consider the plan to be Sound?:

Sound Reason:

See attachment

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5635134 ; http://calderdale-consult.objective.co.uk/file/5635135 ; http://calderdale-consult.objective.co.uk/file/5635136

Comment ID **HRU2233** Site ref (if applicable):

Person ID: **1181961** Name: **Mrs Julie Bullen** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

See attached

Do you consider the plan to be Sound?:

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/5635148

Comment ID **HRU2251** 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 yourauthority, aiming to agree wording to effectively tie the recommendations of the Heritage Impact Assessments to the relevant Local Plan policies. If it is proposed to proceed with the additional site allocations we recommend this would also apply to those sites.

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

Duty to Co-operate Reason:

Suggested Modifications:

Amend Site Specific Consideration to ensure no harm to setting of heirtage assets in the vicinty.

Comments:

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

Comment ID **HRU2272** Site ref (if applicable): **LP0573**

Person ID: **1246947** Name: **Gill Heleine** Organisation: **Manzana Contracts (UK) Ltd**

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

I am not resident in Calderdale in fact I live in the Holme Valley and foolishly brought my business over to Calderdale as I was led to believe that Calderdale Council was good for business and I need to rely on the council to keep me informed.

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

Sound Reason:

Firstly, I have to say I was totally unaware of any of this until a chance meeting by a resident at a local Pilates class . How bad is that for communication. When I first came to look at our premises which was in a very bad state with John Crowther from the council, who was helpful but did apologise for the state of Birds Royd Lane as we bumped along trying to miss the pot holes. That was nearly 4 years ago !!. My Objections are as follows :- 1) Flood - at present my premises have not been flooded which I would like to put on record now, (after Storm Ciara and Dennis ; extreme weather conditions). I drive up Woodhouse Lane on my way home every day and look across and see those meadows ; I don't see fields I see sponges, soaking up rain and slowing down the progress of water to lower grounds. I can't believe that the council can't see this. Everyone is eager to shout about Global warming but then instead of limiting the damage create problems by tarmacking over the fields. All this damage and flooding ; is it all down to weather conditions or planning. I am glad that my business can now be a benchmark to the actions of Calderdale council. 2) Consequences of flooding to my business ; Possibility of the insurance company excluding flood damage ; this would be disastrous to us dealing in wood !! Potential of losing clients as we supply to the leisure industry and work to extreme deadlines . If we don't meet these there is a potential of penalty clauses and losses charged against us which could have a massive impact on the financial stability of this company and loss of jobs 3) Traffic Build Up Do I really have to point this out to the council. Waiting at the traffic lights at Birds Royd Lane with Huddersfield Road. Watching, if you are lucky at times, for one car to get through or even worse nothing gets through and you just watch the lights change while you are sat there. Junction at Birds Royd Lane to Huddersfield Road you put your life in your hands as you attempt to get out on to Huddersfield Road. 4) State of the Roads I have seen Birds Royd Lane deteriorate in the four years that I have been here with the existing traffic ; can you honestly say you will repair to a standard that will take even more traffic. Surely you must listen to business's and the impact your actions will have or maybe not ; is that why we have not been informed ; I can't honestly believe that to be the case. I do feel that the council have not done their job properly in communicating all this and therefore the plan is not sound at this moment in time. Research, proof and communication should be implemented first. I really hope common sense will prevail and you convince us that what you have planned will have no detriment to the environment and the business community.

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 **HRU774** Site ref (if applicable):

Person ID: **1242486** Name: **Mr Ian Thurley** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Consultation arrangements - Section 1 I was not aware of the Local Plan and the significant development proposals planned for Brighouse until now. Furthermore, I only know about this current consultation following an alert from local residents, it is not because of the Council's communication efforts. The planned proposals will have a significant impact on my business and would add to the issues I already experience. It is disappointing that whilst the Council are forging ahead with an excessive employment growth strategy that they have not felt it necessary to discuss these plans with existing businesses to understand the impacts it will have. My business already contributes significant growth and prosperity to the Calderdale economy and in linewith current national direction, we are focusing on increasing productivity to strengthen this further. The council's plans will not support this. My main priority is running my business and ensuring its ongoing viability as a significant employer in Brighouse. Dealing with day to day operations makes it very difficult to engage with concerns beyond this such as the local plan consultation. Unless information is handed to me directly and is easily accessible it can easily pass me by. The Council appears to have totally failed to recognise the different pressures on the business community and the need to consult according and this is unsound. I would be interested to know how many businesses have actually responded to the plan and what specific efforts the council has made in this respect to gain a meaningful response.

Do you consider the plan to be Sound?:

Sound Reason:

Calderdale Local Plan Changes - Additional Consultation I am writing to make comments on the Council's additional consultation about the changes to the submitted Publication Draft Calderdale Local Plan. My business is located on Foundry Street, off Birds Royd Lane in Brighouse. We are the UK's largest manufacturer of welded wire mesh, manufacturing over 18,000 tonnes of mesh annually. We produce high security mesh fencing panels for the Ministry of Justice and the Ministry of Defence, specialist rebound fences for sports facilities, general wire fencing panels for industrial premises and various types of industrial mesh for use in a variety of other manufacturing processes. We currently export around 15% of our output to various countries around Europe and Scandinavia, but also as far afield as Singapore and Australia. We currently employ 53 people and operate a 5-day, 24 hour factory at our Brighouse base. As you may appreciate, 18,000 tonnes of mesh production annually translates into around 1,500 articulated HGV's visiting our site each year; all accessing and leaving Birds Royd Lane via its junction with Huddersfield Road. In addition, the vast majority of our employees travel to and from work by car on a daily basis, adding another 80 or so vehicles to the traffic passing through the same junction each day. On top of that we have regular visitors to site including customers, suppliers and support businesses. In all, I would estimate that there are 25,000 vehicles passing through the Huddersfield Road / Birds Royd Lane junction relating to business with Siddall & Hilton Products Ltd each year. As such, access to a smooth flowing road network to and from the M62 is vital to our continued competitive operation in Brighouse and current levels of congestion over the Calder are regularly disruptive to the smooth operation of the business, causing delays for people and goods. Housing Requirement and Job Growth Strategy - Sections 2, 3, 4.1, 5.3 I object to the Council's strategy to select the highest level of job growth possible to calculate how many new homes should be built in Calderdale. Specifically associated with this, I have severe objections to the excessive allocation of homes for Brighouse. This is unnecessary for the following reasons:- The overall job target is too high, misguided and not achievable. The current direction in economic policy is to focus on productivity. For my business this means increasing automation, identifying efficiencies and reducing carbon emissions. Whilst I agree that some jobs will be created, this will be much more limited over coming years. The council's high growth approach can therefore be questioned. As an example, following a recent MBO, the business is now focused on an ambitious programme of growth, which will see material flows into and out of the business increase by at least 25% in the next 1-3 years as we expand our customer base and product ranges. However, a 25% growth in output is only expected to generate a 10-15% increase in

headcount (i.e. at most another 8 jobs). This does not match up to the council's ambitions. Business support is following this same direction. Grant funding available to businesses from WYCA has moved away from job creation to productivity in line with the priorities of the new Local Industrial Strategy (LIS). The Council's selected economic growth strategy does not align with these changes. The economic strategy relies on significant road building which will increase traffic movements and commuting which is at odds with climate emergency and carbon reduction priorities at a local, regional and national level. The council's economic strategy is unsound and needs to be modified to take a more realistic and measured approach based on emerging changes in business growth and policy direction. This will avoid over provision of land, including significant releases of green belt, and a reliance on uncertain assumptions. In relation to the above, I therefore object to the need to increase overall housing numbers from 840 homes per year to 997 per year over the next 15 years. Of key concern to me is the level of growth planned for Brighouse (5,168 homes), the fact that a further 200 homes have been added through the latest changes and the severe impact the proposed Woodhouse Garden Suburb (LP1451) will have on my business and other existing businesses directly downstream of this excessive allocation. The level of development proposed is unacceptable for the town and needs to be reduced for the following reasons:- The town will be increased by a third of its current size overloading an already clogged road system and adding to issues of flood risk. Brighouse is still taking the highest level of homes (35%), more than Halifax which is the largest commercial centre and more than its fair share. This needs to be distributed more evenly across the authority in line with the settlement hierarchy. Significant highway constraints already exist. This impacts on accessibility and creates time delays for both business vehicles (HGV) and staff to and from my premises from the main highway network, through Brighouse and onto the strategic motorway network. This affects our daily operations and impacts on commercial viability and consequently productivity. Congestion and the resulting journey time is already proving to be a significant barrier to recruiting the best employees in the Yorkshire region. These plans will only make that worse. The only access from my premises to the wider highway network in Brighouse is via Birds Royd Lane. Birds Royd Lane runs from the intersection with Huddersfield Road (A641) to Woodhouse Lane, a total length of approximately 800m. The road serves numerous industrial units and it is largely trafficked by Heavy Goods Vehicles (HGV). HGV traffic generated from existing businesses in the area is set to increase over the coming years to allow us to achieve higher productivity. As noted above, my calculations indicate that there are already 25,000 vehicle interactions at the Huddersfield Road / Birds Royd Lane junction generated by my business annually. Our growth plans will require an additional 750 HGV interactions per annum through that junction en route to and from the M62. Given that businesses have not been adequately consulted, I would question whether our traffic growth has been factored into the transport modelling undertaken for the town to establish the true impact this will have on the road network. Birds Royd Lane provides the key gateway to my business and the Birds Royd industrial area. It is in a severe state of repair. This does not provide a satisfactory impression for potential investors visiting the industrial area and shows both businesses and the council in a negative light as a place to do business with. I am aware that this road is the most complained about road in the authority and yet there are no plans to resolve this through the local plan via the InfrastructureDelivery Plan. Full works are apparently estimated at Â£1.5m. How does this support business growth, increased productivity and the council's economic strategy? The existing businesses that support Calderdale's economy are being failed at the expense of new employment sites. Traffic build up occurs at the junction of Birds Royd with Huddersfield Road throughout the day and this is made worse by traffic queuing down the A641 on the approach to Brighouse. This delays business traffic and reduces our efficiencies, impacting on overall productivity. Queues at Birds Royd Lane junction onto Huddersfield Road add significant time delays due to traffic light signalling and this is added to by the location of the railway car park and volume of residents travelling from Woodhouse to Brighouse (this is an easier route than trying to get out of Daisy Road and is quicker than queuing in traffic down Huddersfield Road into Brighouse). As Birds Royd Lane is located between the 1,257 homes proposed on the Woodhouse Garden Suburb (Ref LP 1451), 24 homes at Woodhouse Lane (Ref LP1000) and 100 homes at the junction of Birds Royd (Re LP 0571) this issue and the impact on my business will increase as traffic volumes and movements

increase down this already inadequate industrial access route. If this isn't bad enough, I am at a loss as to how the council think they are going to put a significant new distributor road through the Garden Suburb to take traffic away from Brighouse and direct it through the industrial area and over Huntington Bridge as the information suggests. Has anyone been down here? This is ill thought out - there is no space to do this without impacting on businesses and it would be unsafe to mix residential and industrial traffic. There is no evidence to confirm that the required infrastructure improvements or funding are in place to resolve these issues. The A641 improvement proposals are still at scoping stage, without even outline business case. Flooding is of critical concern to the businesses along River Street including my own on Foundry Street. The area is located in high risk flood plain and suffers from both fluvial and pluvial (surface water) flooding issues. We are sandwiched between the river and positioned directly downstream of the Woodhouse Garden Suburb (LP1451). The majority of the latter is vulnerable to surface water flooding due to the ground conditions as referenced in the site promoter's drainage assessment. My business came close to being flooded in 2015 and again this last weekend. In order to mitigate the risk to the business we have had to remove production capacity from the buildings on the lowest part of our site and now have significant parts of the site that we are currently unable to utilise, leading to a sub-optimal utilisation of our premises. An increased risk of flooding will likely mean a further retreat of operations to ground higher up Foundry Street. I am aware that flood modelling has now been commissioned by the Environment Agency as a result of the evidence I have provided to them about the fact the datawas out of date and incorrect. Until revised data is available and updated, the flood risk evidence on which the local plan is based is therefore flawed. Our drainage consultant indicates that the building of any fluvial flood defences to address issues in Brighouse will not take place until 2023, taking into account the need to develop a full business case. The phasing and level of development in the town can therefore be questioned until the details of this are fully understood. In addition, in terms of pluvial issues there is currently a lack of knowledge around this. Flood alleviation for this is shown as a phase 3 scheme for which there are no timelines at all yet and yet we are downstream of a site with these particular issues. Mill Royd Street Mixed Use allocation - Sections 5 and 7 I addition to the above, I object to the additional 200 homes being allocated in Brighouse on site LP0573 (Mill Royd Street). This too is located in a high flood risk area which if developed could have severe impacts downstream for my business. This has not been tested yet and needs to be fully integrated into the modelling that is being undertaken. It would add to traffic issues in the centre which impact on access for my employees and our hauliers. Mill Royd Street is a bottleneck. Traffic builds up significantly at both ends of the street due to traffic light sequencing (preference being given to Huddersfield Road traffic flow) and the volume of traffic on Briggate. These issues would need to be resolved in any scheme For the reasons outlined and the severe impact it will have on my business I find the plan's changes unsound

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 **HRU776** Site ref (if applicable):

Person ID: **1243329** Name: **Mrs Maria De Luca** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

I object to the Council's proposal to increase the total number of houses required in the plan and specifically that even more homes are proposed for Brighouse than before . I object to additional 200 homes being allocated in Brighouse-on site LP0573(Millroyd Street). Brighouse roads are already clogged up and congested. If you consider that 5168 new homes will increase the number of possible vehicles by 15,000 when you can average, nowadays three cars per household. Another worry is the possible increase risk of flooding, which has been apparent in the last few days. We have very little green area around us as it is, I want to continue enjoying this home to wild dear, pheasants, and hares; there will be an impact on this wildlife. There is very little parking provision in Brighouse as it is, and it is a bottleneck for traffic travelling to Huddersfield, Bradford and motorways. Please try driving down Woodhouse Lane; it's an obstacle course, and a danger to pedestrians. Please do all you can to modify this change and release brownfield land rather than release green belt land at Woodhouse garden superb. (LP1451)

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 **HRU837** Site ref (if applicable):

Person ID: **1242326** Name: **Head of Operations James Clay Sons** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Housing Requirements and Job Growth Strategy ; Sections 2,3,4.1, 5.3 There appears to be an excessive allocation of development / new homes for Brighouse. Our understanding is that homes in the town will be increased by 5,168 homes. This will overload an already clogged road system. Our HGV traffic is set to increase having already increased by 100% since we moved 3 years ago. The only access for us to the M62

is via Birds Royd Lane which is already serviced by numerous business units. Congestion and increased waiting times at the intersection with Huddersfield roads is the result. As Birds Royd is located between various proposed developments (Ref LP 1451, LP1000, LP 0571) I expect we will see an increase in traffic through this inadequate route. There is no evidence to confirm that the required infrastructure improvements or funding are in place to resolve these issues. I understand the A641 improvement proposals is still at scoping stage, without even an outline business case. As a business we need to bring down our overheads and this requires improving productivity through efficiency, investment, and grant applications. We are not predicting an increase in employment as a result of this. Grant funding available to businesses from WYCA has moved away from job creation to productivity in line with the priorities of the new Local Industrial Strategy (LIS). I don't believe the Council's selected economic growth strategy aligns with these changes. Flooding is of concern to us. The area is in a high-risk flood plain and suffers from both fluvial and pluvial (surface water) flooding issues. We are sandwiched between the river and positioned directly downstream of the Woodhouse Garden Suburb proposed development (LP1451). Much of the latter is vulnerable to surface water flooding due to the ground conditions as referenced in the site promoter's drainage assessment. Flood alleviation for this is shown as a phase 3 scheme for which there are no timelines at all, and yet we are downstream of a site with these issues. Mill Royd Street Mixed Use allocation - Sections 5 and 7 At the sake of repeating my points earlier in my letter this development would have adverse consequences for our business because of the following reasons; This is in a high flood risk area which if developed could have severe impacts downstream for our business. Has this been tested and integrated into the modelling or is that yet to be undertaken? It would add to traffic issues, impacting on accessibility to our business for our employees. All bar three of them access work by driving. Mill Royd Street is a bottleneck. Traffic builds up significantly at both ends of the street due to traffic light sequencing (preference being given to Huddersfield Road traffic flow) and the volume of traffic on Briggate.

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

Duty to Co-operate Reason:

Consultation arrangements - Section 1 Our business was not aware of the local plan and the development proposals planned for Brighouse until December 2019. No consultation was conducted with us. We were made aware of these developments by a local resident association. These proposals would only add to the issues I have already outlined. Has the Council consulted with local businesses and if so, how many have responded?

Suggested Modifications:

Our understanding is that homes in the town will be increased by 5,168 homes. This will overload an already clogged road system. Our HGV traffic is set to increase having already increased by 100% since we moved 3 years ago. The only access for us to the M62 is via Birds Royd Lane which is already serviced by numerous business units. Congestion and increased waiting times at the intersection with Huddersfield roads is the result. As Birds Royd is located between various proposed developments (Ref LP 1451, LP1000, LP 0571) I expect we will see an increase in traffic through this inadequate route. There is no evidence to confirm that the required infrastructure improvements or funding are in place to resolve these issues. I understand the A641 improvement proposals is still at scoping stage, without even an outline business case. Flooding is of concern to us. The area is in a high-risk flood plain and suffers from both fluvial and pluvial (surface water) flooding issues. We are sandwiched between the river and positioned directly downstream of the Woodhouse Garden Suburb proposed development (LP1451). Much of the latter is vulnerable to surface water flooding due to the ground conditions as referenced in the site promoter's drainage assessment. Flood alleviation for this is shown as a phase 3 scheme for which there are no timelines at all, and yet we are downstream of a site with these issues.

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5599780

Comment ID **HRU954** Site ref (if applicable): **LP0573**

Person ID: **11510** Name: **Mr W G Ibberson** Organisation: **Younger Homes (Northern) Ltd**

Agent ID: **1129114** Name: **Mr Roger Lee** Organisation:

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

Legal Compliance Reason:

No comments

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

Sound Reason:

No comments

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

Duty to Co-operate Reason:

No comments

Suggested Modifications:

See attached report

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5609623

Main Issues and Council Response

Legal Compliance

Main Issues:

1. Ineffective consultation with businesses.

Council's Response:

1. Extensive and inclusive consultation has been carried out throughout all stages of the Local Plan preparation process in accordance with the Council's adopted Statement of Community Involvement and is detailed in the Consultation Statement (Regulation 22).

Test of Soundness

Main Issues:

1. Local road network in Brighouse lacks capacity to deal with cumulative impacts arising from Local Plan allocations, impacting on productivity of existing businesses. Inadequate state of existing roads.

2. No evidence that required infrastructure improvements have funding in place. Lack of/pressure on existing amenities, services and facilities in the local area, e.g. schools, shops, doctors.

3. Increased risk of flooding. Flood risk evidence on which the Local Plan is based is flawed. Impact on areas downstream should be integrated into the modelling.

4. Object to increased level of housing growth for Brighouse.

5. The assumed capacity is too low. The site could accommodate significantly more.

6. Environment Agency has commented that Site specific Hydraulic Modelling and FRA required. No more vulnerable or highly
vulnerable uses on the ground floor. Emergency Access and egress plans must be provided to the LPA for consideration and agreement.

7. Brighouse would lose a car park.

8. Impact on existing businesses.

9. Multiple landownership prevents this from being a developable site.

10. Impact on ecology along the river and canal.

11. 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. 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. 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. 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. A Transport Assessment in any planning application would need to assess impact on local road network.

2. The Local Plan is supported by the Infrastructure Development Plan which sets out the infrastructure requirements resulting from the growth proposed in the borough.
The IDP has been updated to include a table setting out the Local Plan housing trajectory and the provision of critical infrastructure. This table shows the cumulative trajectory; the individual infrastructure projects that need to be delivered by that point in time; funding status; regulatory status; construction status and lead agency/partners.
The Infrastructure Delivery Plan (EV42.1) sets out the strategies, plans and programmes for tackling flooding.

3. The NPPF makes it clear that 'inappropriate development in areas at risk of flooding should be avoided by

directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere'. Supported by the Calder Catchment Strategic Flood Risk Assessment 2016 (SFRA), the Local Plan is focused upon managing flood risk from all sources and applying a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change.

The majority of the site is located in Flood Zone 3ai and any development proposal will be subject to the Exception Test. There is a potential flood risk from the River Calder and whilst no surface water drainage issues have been reported an evaluation of surface drainage network is required, and site investigations. This site is one of 12 where a detailed appraisal of the flood risks have been undertaken and reported in the Level 2 Strategic Flood Risk Assessment - Site Screening Report (JBA). If the site is to be taken forward, a detailed site specific Flood Risk Assessment will need to be undertaken and a sequential test will need to be passed where it can be demonstrated that there are no suitable alternative sites within Brighouse as other sites/areas within Flood Zones 1 and 2 are allocated for appropriate uses, already have planning permission or support established and stable uses. It needs to be shown that locating this development on less sustainable sites with poor infrastructure would be economically and socially unacceptable resulting in increased use of the private car and social exclusion and the development of greenfield rather than brownfield sites leading to unsustainable patterns of development. It needs to be demonstrated that the development will provide wider sustainability benefits to the community and that the development is safe without increasing flood risk elsewhere. Further, the site should be brought forward later in the plan period to take advantage of future planned flood alleviation schemes. This isn't likely until around 2020, however.

4. As the Local Plan developed and the work was undertaken to understand the implications of the potential growth, it was found that Halifax could not accommodate as much developments as originally sought, because of the potential for significant effects upon the SPA and SAC as identified through the HRA process. Brighouse therefore became more attractive as a potential location for significant development.

5. The size, location and nature of the site require the use of master planning to ensure that a comprehensive development is achieved and potential opportunities are maximised.

A masterplan must assess the potential to provide a range of uses on site, which will include residential, with a mix of A, B , D or sui generis uses. The capacity of the site showing a mix of Residential and B employment is indicative only, and the Master Plan will present an appropriate mix of different uses.

6. Environment Agency comments to be integrated in site assessment summary where appropriate.

7. see 5) above.
In identifying the future mix of uses on the site, the master plan will consider the potential and requirement to retain existing uses where appropriate.

8. see 5) above.
In identifying the future mix of uses on the site, the master plan will consider the potential and requirement to retain existing uses where appropriate. Brighouse Town Centre is currently the focus of several initiatives to grow the economy and improve the environment in the town, together with involvement from a range of stakeholders

9. see 8) above

10. Both West Yorkshire Ecology and the Council's Conservation (Ecology) Section have identified a number of measures to mitigate against potential negative effects of development on this site. An Ecological Impact

Assessment and Bat survey will also need to be undertaken.

11.The Council has prepared a Statement of Common Ground with Historic England, and has agreed amended wording for the Site Specific Considerations for sites included in the Publication Draft Local Plan. This wording will be amended for all additional sites in this consultation.

Duty to Co-operate

Main Issues:

1. Ineffective consultation with businesses.

Council's Response:

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

Suggested Modifications

1. The Local Plan is unsound and should be completely re-examined.

2. Consider viability of development.

3. Keep Mill Royd Street - incorporate it within designs.

4. Approach limited to considering increased housing provision, rather than considering less economic development in an area with already near full employment.

5. Environment Agency comments to be integrated in site assessment summary where appropriate.

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

Council's Response:

1. The Local Plan is currently being examined by a Government appointed Inspector. No modification required.

2.This aspect will considered in the context of the Master planning, and the regeneration programmes that are available to fund initiatives in the town centre, eg. West Yorkshire Plus Transport fund, Town Deals Fund, Transforming Cities Fund, City Connect, flood alleviation

3. see 2) above.

4.The size, location and nature of the site require the use of master planning to ensure that a comprehensive development is achieved and potential opportunities are maximised.

A masterplan must assess the potential to provide a range of uses on site, which will include residential, with a mix of A, B , D or sui generis uses. The capacity of the site showing a mix of Residential and B employment is indicative only, and the Master Plan will present an appropriate mix of different uses.

5. Agreed. Environment Agency comments to be integrated in site specific considerations where appropriate.

6. Agreed. The Council has prepared a Statement of Common Ground with Historic England, and has agreed

amended wording for the Site Specific Considerations for sites included in the Publication Draft Local Plan. This wording will be amended for all additional sites in this consultation.

Document Section: 8 Mytholmroyd Additional Mixed Use 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:

Document Section: Site number LP1622 Top Land, Cragg Vale, Hebden Bridge, HX7 5

Representations

Comment ID **HRU1185** Site ref (if applicable): **LP1622**

Person ID: **1128107** Name: **Mrs Julie Simcock** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

see below

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

Sound Reason:

There are a number of points of concern about the proposed development of Toplands business park. Geenbelt - The land is currently greenbelt and has SSSI in the vicinity, by building on this greenbelt land it would have a significant impact on the area. Theland is on a sloped hillside, the building of any properties on this land will also have a significant visual impact on the landscape of the village, which would be to the areas detriment as the site isvisible from many miles away. Wildlife - The wildlife corridor will be disrupted, the area is home to wildlife including bats, deer, wild birds and other animals. Any development will cause added water run off ,damaging the woodland along the hillside adjacent, which is used on a regular basis by local people for walking and will reduce access to the countryside. Flood risk - There would be increased flood risk to houses in the Hall Bank Lane area and also to the houses and business in the valley bottom. These houses and businesses are already effected by current flooding and already struggling with the long term affects of flooding. It seems senseless to consider building more properties, which then put these existing houses and business at an even higher risk. The water run off, down Hall bank Lane and from the existing top land fields into the brook is already significant, and the existing fields do alleviate some of the water run off, but toreplace these fields with tarmac and buildings would increase the amount of water run off and increased the risk of flooding in the village. There was work carried out at the top of Hall Bank lane at a significant cost to the council, to ease the water run off, but at the last flood in Feb 2020, but these defenses failed catastrophically and actually caused additional damage. The stones used for creating these defenses as part of the flood alleviation work, all washed down Hall bank Lane, causing drains to break and significant damage to the roads. I have photos of the damage and amount of water running down Hall bank lane, after the so called flood alleviation work was in place at the top of hall bank lane. The proposal suggests the installation of storage tanks - all this will do is collect some, but not allwater and cause a different flood pattern as water courses will change, as we have seen with recent works. Streets that currently do not flood will likely flood, and those further down the hill will have an increased risk. Traffic - Hall Bank Lane is narrow and has limited lighting and no footpath - and already has large numbers of pedestrians sharing the road with cars and lorries. Many sat navs are already incorrectly sending lorries up the hill to access the current buildings at Toplands business park. While the plans state access to the site will not be via Hall Bank Lane, this does not mean this will not be used at a "rat run" due to it being a quicker was to access the Toplands site. There are also additional issues with the use of Cragg Road as the main entrance to the site, included poorvisibily entering and exiting the site, for both cars and pedestrians, and the increase of vehicles using this residential road. Listed buildings - There a number of grade 2 listed buildings on Hall Bank lane, and the addition on 50 houses in the fieldoverlooking these buildings will

impact on their environment and surroundings. What is not know is if any significant building work next to these houses would harm these houses structurally. They are already at risk of flood due to them fronting Hall Bank Lane, and the volume of water that they are currently exposed to, and there is a concern that any work in the next field, could increase the flood risk and cause damage to the properties.

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

Duty to Co-operate Reason:

see above

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1307** Site ref (if applicable): **LP1622**

Person ID: **1123858** Name: **Mr Paul Wallace** Organisation:

Agent ID: Name: Organisation:

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 increase in hard standing would increase the already dangerous flows onto the Millpond below and Cragg Brook. During the recent Storms I have video footage of several "waterfalls" roaring down from the Toplands to the Millpond and into the brook. These continued for 3 days after the storm. Any development of Mytholmroyd green land is madness.

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

Duty to Co-operate Reason:

Suggested Modifications:

filter as rejected from local plan

Comments:

Additional Evidence Link:

Comment ID **HRU1321** Site ref (if applicable): **LP1622**

Person ID: **1243968** Name: **Mr James Halliday** 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 proposed plan will increase the risk of flooding to Mytholmroyd and the lower scout road area. The surrounding area already suffers from surface water run off and the decimation of this green area will only add to this issue. Hall Bank lane is already an extremely dangerous road for pedestrians due to fast moving traffic with virtually no space for pedestrians and traffic to pass safely. This development would add to the heavy traffic and ongoing safety issues around Hall Bank Lane. The site will also damage our greenbelt and destroy vital habitat for local wildlife.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1614** Site ref (if applicable): **LP1622**

Person ID: **1128188** Name: **Ms Jane O'Neill** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Flooding The two large fields identified in this site currently play an important role in absorbing rainfall from the surrounding hillside. The fields and surrounding land is saturated for much of the year. Whenever there is heavy rain there is a river running down Hall Bank Lane, recent flood works to stop this have made no difference at all. There are significant challenges to collecting the water run off that will not be addressed by further tarmac, roads, housing and business units. The proposal suggests the installation of storage tanks - all this will do is collect some, but not allwater and cause a different flood pattern as water courses will change, as we have seen with recent works. Streets that currently do not flood will be more likely to flood, and those further down the hill will have an increased risk as will the resilience of Cragg Brook. Given the likelihood of an increase in the regularity of the extreme weather conditions we have seen in 2015 and 2020 and the significant impact this has had on Mytholmroyd and Calderdale any building

which increases the likelihood of more flooding is surely not sensible. Highways 56 live-work units presumably means 56 units that act both as residential and work units thus potentially having the impact of 112 single use units. Access will be via Cragg Road which means that a significant increase in the number of both heavy goods vehicles and cars using the already congested New Road bridge junction together with the vehicles trying to access the 200 extra parking spaces at the train station. This will impact on Residents - particularly on people who live in the bottom of the valley and will suffer the effects of increased pollution and noise The ability of traffic to move easily around Mytholmroyd ; particularly on New Bridge where large vehicles already cause congestion as they struggle to cross the bridge when traffic is queuing. Minor roads e.g. Scout Road and Heights Road as congestion in the valley increases. I am certainly aware of occasions where large HGVs have got stuck at the bottom of Scout Road whilst trying to avoid the current flood works. I am particularly concerned about the impact on Hall Bank Lane. Since the road was built to join Top Land to Hall Bank Lane there has been an increase in the traffic that uses Hall Bank Lane from several sources: People who work on or are visiting Top Land who park on Hall Bank Lane or in the car park and cut through People who drive up to drop off and collect others who work on Top Land People delivering goods to Top Land who park and carry through People who believe they will be able to shortcut through to Top Land - heavy goods vehicles regularly try and cut through. Last year this included an articulated lorry which blocked traffic for a couple of hours. If you look at Google Maps you get the impression that there is a through road. Hall Bank Lane is a narrow road, mainly single track withtwo blind corners and no pavement which barely has room for pedestrians and cars to pass.This proposal will not only result in an increase in the traffic using Hall Bank Lane it will also increase the pedestrian use. I would anticipate most of the residents of these units would choose to walk in to Mytholmroyd via Hall Bank Lane. There is no space for pedestrians and vehicles to pass each other safely on Hall Bank Lane. For the elderly andpeople withyoung children, especiallywith pushchairs, navigating vehicles is a nightmare. An increase in the number of business units on Top Land is only going to aggravate this situation. An increase of this size is likely to cause major issues. It is an accident waiting to happen. Ecology and Open Space The site is designated highly sensitive green belt, it and exists to prevent urban sprawl and to protect our countryside. This site is a wildlife corridor used daily by wild geese and frequently by deer. We, along with our neighbours see bats in our gardens most evening and are visited by birds of prey and hear owls at night. The site is close to Broadhead Clough SSSI and building on the site is likely to impact on this area - In particular, pollution from building work, traffic and noise and other pollution from the industrial aspect of these units. The proposed area extends the existing village boundary and given its location highon a hillside will be visible from across the village. A large area of industrial development is not consistent with retaining the distinctive character of Mytholmroyd as a village. The whole site is circled by public footpaths which are well used and are within easy access to Mytholmroyd thus being particularly important to those who do not walk far and wish to walk in the countryside. I am also concerned about the increase in noise, light and pollution for residents who live near the proposed site. Current restrictions on usage are not enforced with traffic and noise from Top Land throughout the weekend and evenings. People who rent units on the site have 24 hour 7 day access to the gate at the Top of Hall Bank Lane and they use it. Creating a Live- work environment effectively gives permission for work activities to take place 24 hours a day Infrastructure There is no mention of the impact on the local infrastructure. In particular our already overstretched schools, doctors and dentists. The increase of people living in this community will put additional pressure on these services therefore having a negative impact on the existing community.

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

Duty to Co-operate Reason:

There has been no notification to anyone living in Mytholmroyd of this consultation process. The only way you can be aware of it is if you objected to the previous plan. The website and email communication is extremely inaccessible.

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610167

Comment ID **HRU1689** Site ref (if applicable): **LP1622**

Person ID: **1244120** Name: **Mr Richard Haselhurst** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

Don't know. Have no legal training.

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

Sound Reason:

1. Wildlife. There are at least two different species of bats who live in this specific area who are dependent on the insect population. The geese that everyone loves to see on the canal and river during the day all come and roost in this green field each night. There is a significant amount of other wildlife (deer,fox, stoat, hedgehog) which I and others have been fortunate to observe. It follows that there are smaller mammals and insects as a food source for the above. The area is also a food source for White-tailed Bumblebees, Carder Bees and domesticated honey-bees. Any construction/ development / industrial use of this agricultural land would cause irreparable damage to this important wildlife corridor. 2. Stormwater. Situated bove Cragg Vale Road, any further development on this site can only exacerbate the problems experienced along Cragg Brook ; Flooding, erosion of the river course. 3.Traffic a) Hall Bank Lane is not a through road yet heavy goods traffic still tries to gain access to the existing units from there. There is only a chain across the track which prevents vehicular access. How long until the chain goes and it becomes convenient to use this short-cut? There will no doubt be those who find it convenient to park on Hall Bank Lane and walk into Top Lands clogging a cul-de-sac until they go home. b) Cragg Vale is already a busy road and is heavily used by cyclists. The residents have to park on the street. The 20mph speed limit is often ignored. 4. Visual impact I can find no description of the construction proposed but this site is on Mytholmroyds Skyline and will have considerable visual impact.

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

Duty to Co-operate Reason:

Don't know.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1769** Site ref (if applicable): **LP1622**

Person ID: **1244189** Name: **Ms Patricia Haselhurst** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

As someone who lives very close to the site of the proposed development I am not aware of any consultation of the local community made by the LPA regarding the necessity or effects of this particular proposal.

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

Sound Reason:

Wildlife. This area is a known wildlife corridor. It should therefore not be developed any further. The noted area provides habitat for several mammal species including roe deer, fox, moles,stoats, bank voles etc. There are also at least three species of bats which hunt across the field and at the edges of the road and woodland. These are all protected species. Over-wintering geese (some migratory?) use this site each evening from October through to early spring as a feeding/roosting site. Several species of bees are found in this area, they are endangered species, common bumblebee, buff-tailed bumblebee,leaf-cutter bee and honeybees. Any further development on this site will very seriously damage the habitat of these animals and insects and they will be lost to us. Even in this little space it becomes detrimental to the planet as a whole. Flooding These fields are very necessary to soak up the rainfall in this area. Any further building on this site will increase run-off and consequent damage to property and transport infrastructure in the area. Hall Bank Lane already becomes a torrent when there is heavy rainfall, some cottages are already denied access/exit via their front doors due to the strong stream running by their doorsteps. The road,which is narrow and quite steep, is becoming damaged from the waterflow when the drains cannot cope with the volume of run-off from the fields. Traffic No proper consideration seems to have been given to the increase of traffic and building machinery during the development of the site and subsequently when it would be "occupied". It is my opinion that the roads would be further damaged by this extra traffic incursion. Hall Bank Lane is, through 80% of its length, a narrow single file road with high banks. Apart from one small area it has no pavement for pedestrians. This development would bring increased traffic to this area which would be detrimental to the state of the road and probably dangerous to walkers, ramblers and residents who use the road. Larger vehicles already have problems in gaining access,attempting to turn or in reversing and some very large ones, which have been misdirected by their sat-navs, can find it extremely difficult to extricate themselves. Hall Bank Lane cannot support any increase in traffic in any sensible opinion and this should have been made clear in any survey made for this proposal.

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 **HRU2033** Site ref (if applicable):

Person ID: **960869** Name: **Stonebridge Homes** Organisation:

Agent ID: **691692** Name: **Ms Lucie Jowett** Organisation: **Senior Planner Barton Willmore**

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

Legal Compliance Reason:

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

Sound Reason:

These representations are submitted on behalf of a consortium of housebuilders. The housebuilders for whom these representations are made on behalf of are Barratt and David Wilson Homes (Yorkshire) Limited, Avant Homes, Alcuin Homes, Stonebridge Homes and Persimmon Homes (West Yorkshire). PLEASE SEE ATTACHED FOR FULL REPRESENTATION Employment allocation LP1622 at Mytholmroyd has been revised to a mixed-use live/work development. No evidence has been submitted to demonstrate why this allocation has been revised and the implications on housing or employment numbers.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5633062

Comment ID **HRU2034** Site ref (if applicable):

Person ID: **1185901** Name: **Avant Homes** Organisation:

Agent ID: **691692** Name: **Ms Lucie Jowett** Organisation: **Senior Planner Barton Willmore**

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

Legal Compliance Reason:

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

Sound Reason:

These representations are submitted on behalf of a consortium of housebuilders. The housebuilders for whom these representations are made on behalf of are Barratt and David Wilson Homes (Yorkshire) Limited, Avant Homes, Alcuin Homes, Stonebridge Homes and Persimmon Homes (West Yorkshire). PLEASE

SEE ATTACHED FOR FULL REPRESENTATION Employment allocation LP1622 at Mytholmroyd has been revised to a mixed-use live/work development. No evidence has been submitted to demonstrate why this allocation has been revised and the implications on housing or employment numbers.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5633062

Comment ID **HRU2035** Site ref (if applicable):

Person ID: **961885** Name: **Alcuin Homes** Organisation:

Agent ID: **691692** Name: **Ms Lucie Jowett** Organisation: **Senior Planner Barton Willmore**

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

Legal Compliance Reason:

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

Sound Reason:

These representations are submitted on behalf of a consortium of housebuilders. The housebuilders for whom these representations are made on behalf of are Barratt and David Wilson Homes (Yorkshire) Limited, Avant Homes, Alcuin Homes, Stonebridge Homes and Persimmon Homes (West Yorkshire). PLEASE SEE ATTACHED FOR FULL REPRESENTATION Employment allocation LP1622 at Mytholmroyd has been revised to a mixed-use live/work development. No evidence has been submitted to demonstrate why this allocation has been revised and the implications on housing or employment numbers.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5633062

Comment ID **HRU2036** Site ref (if applicable):

Person ID: **1185995** Name: **Persimmon Homes (West** Organisation:

Yorkshire)

Agent ID: **691692** Name: **Ms Lucie Jowett** Organisation: **Senior Planner Barton Willmore**

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

Legal Compliance Reason:

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

Sound Reason:

These representations are submitted on behalf of a consortium of housebuilders. The housebuilders for whom these representations are made on behalf of are Barratt and David Wilson Homes (Yorkshire) Limited, Avant Homes, Alcuin Homes, Stonebridge Homes and Persimmon Homes (West Yorkshire). PLEASE SEE ATTACHED FOR FULL REPRESENTATION Employment allocation LP1622 at Mytholmroyd has been revised to a mixed-use live/work development. No evidence has been submitted to demonstrate why this allocation has been revised and the implications on housing or employment numbers.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5633062

Comment ID **HRU2037** Site ref (if applicable):

Person ID: **855708** Name: **Barratt Homes & David Wilson Homes** Organisation: **Barratt Homes & David Wilson Homes**

Agent ID: **691692** Name: **Ms Lucie Jowett** Organisation: **Senior Planner Barton Willmore**

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

Legal Compliance Reason:

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

Sound Reason:

These representations are submitted on behalf of a consortium of housebuilders. The housebuilders for whom these representations are made on behalf of are Barratt and David Wilson Homes (Yorkshire) Limited, Avant Homes, Alcuin Homes, Stonebridge Homes and Persimmon Homes (West Yorkshire). PLEASE SEE ATTACHED FOR FULL REPRESENTATION Employment allocation LP1622 at Mytholmroyd has been revised to a mixed-use live/work development. No evidence has been submitted to demonstrate why this

allocation has been revised and the implications on housing or employment numbers.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5633062

Comment ID **HRU2100** Site ref (if applicable):

Person ID: **1246644** Name: **Mr J Rowntree** Organisation: **Thornber Chicks**

Agent ID: **1062345** Name: **Mr Nick Willock** Organisation: **Robert Halstead Chartered Surveyors & Town Planners**

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

Legal Compliance Reason:

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

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION Introduction We write in regard to the proposed draft mixed-use allocation on behalf of Thornber Chicks Ltd, the landowner for the above site. As the Council will be aware, the 8.38 ha site is currently located in the Green Belt and in an area of Special Landscape Value in the RCUDP. The site was put forward as a New Employment Site in the Initial Draft Local Plan and was taken forward as such in the Local Plan Publication Draft. However, following the Stage 1 Hearings and concerns raised by the Inspector, it was concluded that additional housing sites are required and therefore, the Council's preferred use of the site is now for an additional mixed-use site to include 'live-work' and small scale B1 units. Although the landowners are not against the site being used for mixed-use purposes in principle, they do have a number of questions / reservations at this stage before being able to fully support the proposed change from purely business development to that of mixed uses. These questions / reservations principally relating to ensuring that residential and business elements can co-exist without causing detrimental impacts on one another (or the existing business park). Conclusion ....the previously proposed business allocation is currently preferred over the mixed use 'publication draft' allocation, subject to further discussions and clarification on the points raised above. However, the landowners are happy and willing to discuss these matters with the Council, with a view to developing an overall masterplan of the site to see whether a mixed-use scheme to include residential units could be a viable and realistic option for the site.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5633620

Comment ID **HRU2108** Site ref (if applicable):

Person ID: **1244162** Name: **Mrs Jane Carroll** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

This site stands prominent in the landscape at its higher end and any development will impact on the attractive local scenery from all angles across the valley. The proposal will generate additional traffic along New Road which is very narrow before the bridge and already congested at key times. This will increase pollution for the homes along that stretch in particular. Despite the main access being from Cragg Road it is still likely that traffic will attempt to pass via Hall Bank Lane which will cause significant congestion due to the limited turning and passing places. The role of the land as a current water soak from the hills behind is potentially significant and its loss could be a problem for future flooding events. Given the recent severe weather events it is inappropriate to consider planning permission for such a major development in the area. The proposal is also likely to put pressure on local medical and educational facilities.

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 **HRU2255** 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 yourauthority, aiming to agree wording to effectively tie the recommendations of the Heritage Impact Assessments to the relevant Local Plan policies. If it is proposed to proceed with the additional site allocations we recommend this would also apply to those sites.

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

Duty to Co-operate Reason:

Suggested Modifications:

Amend Site Specific Consideration to ensure no harm to setting of heirtage assets in the vicinty.

Comments:

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

Comment ID **HRU2274** Site ref (if applicable): **LP1622**

Person ID: **1246951** Name: **Matt & Emily Ryall** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

THIS COMMENT WAS RECEIVED AFTER THE CLOSURE OF THE REPRESENTATION PERIOD. We live on Stubbings Close in Mytholmroyd and back on to site number LP1622, which is owned by Thornber Chicks who wish to install 50 live work units There are some key concerns which I want to be reviewed in the planning permission 1, Flood risk the lad drainsin the planned area are in disrepair and resulted in floodinginto gardens backing onto the planned area (stubbings lane), as well as down hall bank lane impacting local church, public house and residence. The flooding in that area and material deposited was

directly a result ofunmaintained drainage in planned development area. Video footage available 2, Right to Light The houses backing onto the planned development area (stubbings lane) are both down slope and in a number of cases dug into the slope, so much so that the base of the boundary wall is approx. chest to head height (3-6ft) depending on placement along the boundary. The backs of houses on stubbings lane face toward the south and receive low sun in winter. Any single story building placed toward the boundary will have significant impact on the light at these houses due to the upslope nature of the development. These house will become overlooked and the hours of operation currently see units used all weekend and late at evenings (weekdays and evenings) 3, WildLife Corridor and protected species within planned development area photographic and video evidence is available of the following species Newt, Toad, Tawny Owl (breeding pair), hawke moth Sightings of the following Stoat, Fox, deer, brown hare, bats (multiple species 15-25cm wingspan) fieldmouse, sparrow hawk, buzzard,curlew, fieldfare, pied woodpecker, green woodpecker, significant bumble bee & honey bee population. 4, Light Pollution the current units have flood lights facing outward directed at properties backing onto the development and remain on 24x7 causing significant light pollution. If the same security model is adopted this will worsen and already unacceptable intrusion and light pollution. Double layered curtains do not prevent light penetrating and impacting sleep. 5, Noise pollution/outside of operating hours current site is used out of operating hours (sat & Sunday) with loud machinery/engines running late into weekend evenings. 6, Occupancy and market conditions There are already a significant number of units at current site and Moderna. Mytholmroyd is a linear settlement on a flood plan/narrow valley and rural location. It has a population of 4000 and already the highest industrial unit per capita in the area. There are significant number of empty units in mytholmroyd and demand is not near to exceeding supply. There is not the local or commuter population to warrant the development over other industrial areas in Calderdale like Halifax, sowerby bridge and Elland. 7, Infrastructure load The transport infrastructure is already over capacity with Burnley road and recent flood events proving s challenge for this already under pressure community. Added to that, main(Cragg Road) and alternate (Hall Bank Lane) access have significant challenges with parking on Cragg Road and the turn on/off Burnley road already exceeding target levels and causing a pollution hazard for both local resident and school children walking to local primary & secondary school. Hall Bank lane is single track with no footpath and is already a hazard with Thompson Reuter and Existing Thornber workers walking up it with 2 way traffic at start, mid and end of day.

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 **HRU2308** Site ref (if applicable):

Person ID: **1246990** Name: **Ms Susan Danecka** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

I would like to object to application LP1622 Part living/work units due to the build up of surface water on both sides of the field which leads to flooding, also erosion of earth, contamination and distress. Both wildlife, trees and constant upheaval of peoples businesses and homes.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU39** Site ref (if applicable):

Person ID: **1126233** Name: **Mr Scott Patient** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

I take a neutral stance on this site but have concerns specifically around access and potential surface water flooding issues. Also I wish to make known any possibility of conflict between wildlife and human activity. I hope these will be taken into account.

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 **HRU427** Site ref (if applicable): **LP1622**

Person ID: **1124024** Name: **Miss Katherine Welsh** 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:

How can anyone consider this to be a sound plan when we are looking at the third major flood in 8 years? Surely for all those people that have lost their homes and businesses we are admitting we don't care and want to add to the problem. This is greenfield site. It holds an invaluable amount of water during these events. Take a look at the attached photo. If we build on this, ask yourselves where the water will go at the next bad storm? How many extra flooded houses is it? Will you be morally accountable if they haven't flooded before and they do now? I suggest before anyone decides to pass these proposals they actually get up off their arses and walk round the bottom field and take a look at the drop. People's homes are at the bottom of this. We have already had one land slide locally on Scout Road. We should not be potentially doing this again. Hallbank Lane is wide enough for just one car. The council have recently given planning permission for The Chapel which has increased traffic up and down this road. To add more houses means more pedestrians, more cars and more walkers, with no pavement. This is not a good mix. I have walked up this hill with a pram and it is pretty tight for a car to get past at the same time. What will be the solution to avoid accidents? It boggles the mind that to tick boxes we are prepared to ruin the countryside we live in. There are numerous brownfield sites that need redeveloping but because they don't meet the exact criteria set by someone in London they aren't being considered. We should be doing what is right for our area, instead we are ruining our local environment. We live in a valley with limited space, instead of building on more green belt sites we should be thinking of ways to make the most of what we have, without adding to the already existing flooding problems.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5601685

Comment ID **HRU430** Site ref (if applicable): **1622**

Person ID: **1181969** Name: **Mr Paul Burnside** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Local environmental issues eg localised flooding has been graded as low impact, the proposed site acts as a soak away for the surface water running off the hills above the field, we have had flood prevention works at the top of hall Bank Lane to eases the flow of water these failed on 9/2/20 Hall bank Lane again became the natural water course for the deluge, with this site been developed the surface water will need to go somewhere historically the Brook housing estate to the west of the site already floods along cragg Road as the river struggles with the volume of water, lower hall bank lane also floods as the drains again can not cope with the amount of water running down the road off the hills above the proposed site. The proposed development of 50 units will assuming each unit has 2 cars impact significantly on the already overly congested burnley road along in to new road, the plan does state further review of traffic management is required however there is no mention of new road and Burnley Road only cragg road, the entrance to the proposed site is extreamly dangerous to navigate as it is on a blind bend the increase in traffic is going to make this dangerous concideration should also be made to the Ark day nursery situated on the entrance to the site the road that will be used for entrance runs directly along the edge of the children's outdoor play areas. The plan states that concideration also needs to be given to the listed property's surrounding the site however there is no mention of one of these been of historical importance with links to the cragg coiners, or what those concideration should be as all the listed buildings are built with mullion windows and stone roofs, is this the style of building that should be undertaken if this site is approved? The site around Hall bank Lane has over the years seen some development over the last 15 years with the addition of modern town houses again although sympathetically built more of these modern buildings built next to 300 year old cottages is going to significantly impact on the beauty of the area. The site is a natural habitat for wildlife eg Deer's and bird's, the wooded site along the edge is also home to bat's that can be seen feeding on insects most evenings.

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 **HRU462** Site ref (if applicable):

Person ID: **1242596** Name: **mrs emma boynton-hunt** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

I believe the plan to be sound but given the tendency for this area to flood I am concerned that the additional development will increase the likelihood of the happening again as it will remove valuable green belt areas where ground can soak the water. The run off from this ground water will have a direct impact on my own property, queen street, which flooded in 2016. I am also interested to explore the increase in traffic on cragg road and hall bank lane and how these roads would be able to handle the increase in heavy goods traffic and the direct link this would have on pedestrian safety.

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 **HRU480** Site ref (if applicable): **LP1622**

Person ID: **1242679** Name: **Mr Richard Brass** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

This question is beyond my remit as I've not had the training to answer such a question, and I'm guessing many local residents won't understand this question either. A "Don't Know" box should be added.

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

Sound Reason:

Again I don't have the expertise to definitively answer "yes" or "no". However I do consider the plan to not be sound for the following reasons. Access: There will be added pressure to traffic on Hall Bank Lane. As a local resident I use Hall Bank Lane daily and I feel that the road is already pressured enough to be hazardous. I feel sure that in its current state and with the level of traffic usage, that an accident will occur at some point. The road is steep and narrow and pedestrians who have to use it daily for access to homes on and off the road are frequently put in potential peril, especially in the dark, slippy conditions and when it's raining. The road is so narrow that any slight slip when a vehicle is passing could cause serious injury or death, and for children, the elderly or a simply careless pedestrian or vehicle user, this is dangerous enough as it is. Flooding: Without getting overly emotional after recent events, I'd like to suggest that a sizable site such as the one posited, with an already flood prone community below (also adjoining Hall Bank Lane which frequently becomes a torrential rush of water in heavy rain) that the planned site cannot be sensible due to the removal of green land which will currently hold water helping preserve properties from potential flooding below. Wildlife and Wildlife corridor: natural wildlife corridors are of great importance for maintaining a balanced ecosystem and preserving the richness of the landscape, they allow for the safety and preservation of protected species, and they contribute to the beauty of the Calder Valley and its landscape character and tranquility. This land marks part of the richness that lies between Cragg Vale and Mytholmroyd and should be preserved for both a balanced ecosystem and a green belt helping to

retain absorption and preserve water run off. I'd like to see substantial subsidies for landowners in situations like this to support tree planting and for preserving green belt, as they provide a vital function and should form part of flood prevention plans such as those currently taking place in Mytholmroyd and the rest of the Calder Valley.

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

Duty to Co-operate Reason:

Suggested Modifications:

See previous reasons noted. I'm unclear as to what legally compliant and other legal jargon incorporated in this wording means. I just wished to make comments about the plan.

Comments:

Additional Evidence Link:

Comment ID **HRU631** Site ref (if applicable): **LP1622**

Person ID: **1130784** Name: **Mrs Margaret Parker** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

Absolute madness to consider this site for building if you take in the instability of this hillside should building commence. Firstly heavy lorries and machinery to be brought in, from where, Hall Bank Lane cannot for one moment be able to withstand this, as far too narrow, far too steep, not enough drainage, dangerous to pedestrians let alone all the traffic that use it on a day to day basis. Noise, pollution and privacy to residents should also be taken into consideration. Cragg road is a busy road in itself and the access point is a very steep turn off the main road with a very large and busy nursery business in situ, along with other businesses eg. Hairdressers, offices, warehouses, etc, the pollution would be greatly increased with the overuse of this area. As far flooding, it doesn't take that much rain for rain inlets to form within these fields, a natural source that comes down the hillside from the moors, nothing will stop this as water always finds its own level and that's downwards. Houses below these fields find this out to their cost.Deer, foxes, birds and other wildlife, including bats, are to be seen here. Using this green belt land would certainly make a blot on the landscape and shouldn't be allowed.

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

Sound Reason:

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU691** Site ref (if applicable): **LP1622**

Person ID: **1243131** Name: **Miss Joanne Richmond** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

I would like to make a number of points about the proposed development next to Toplands business units - backing on to Hall Bank lane and connected streets. The major issue is the flood risk. Water run off, down Hall bank Lane is already significant. In the recent floods, work Yorkshire water had done to address issues from the 2015 floods, was washed away. There are significant challenges to collecting the water run off that will not be addressed by further tarmac, roads and business units. The proposal suggests the installation of storage tanks - all this will do is collect some, but not allwater and cause a different flood pattern as water courses will change, as we have seen with recent works. Streets that currently do not flood will likely flood, and those further down the hill will have an increased risk. I have film of the volume of water and rubble that comes down the hill each time there is heavy rain - the land should continue to be used to helpsoak up water as it does now. Mt second concern is traffic. Hall Bank Lane is narrow and has limited lighting and no footpath - and already has large numbers of pedestrians sharing the road with cars and lorries. The most recent development of the car park, that residents objected to - has already increased traffic flow. Many satnavs are sending lorries up the hill to access the business park. There will be increased airpollution and noise for adjoining properties. The wildlife corridor will be disrupted, the area is home to wildlife including bats, deer, wild birds and other animals. Development will cause added water run off ,damaging the woodland along the hillside adjacent, which is used on a regular basis by local people for walking - increasing activity levels is a priority for the council - damaging this area will reduce access to the countryside.

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

Sound Reason:

see above

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

Duty to Co-operate Reason:

see above

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU921** Site ref (if applicable): **LP1622**

Person ID: **1183521** Name: **Mrs Caroline Bate** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

I understand that the original proposal for this development to be included in the LDP was submitted after the closing date and therefore should not have been considered.

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

Sound Reason:

Flood Risk - as we are all very aware, Mytholmroyd has suffered its second major flood in 4 years, and has very nearly flooded on several other occasions. The two fields that are being considered for development soaked up a very significant amount of rainfall and water run off (I have photos and videos of rivers running through these fields) during the February flood which prevented the situation being even worse than it actually was - if these fields were developed, this water would have run straight down the hill into the Calder Brook, flooding houses at the bottom of the fields, The Brook and the bottom of Cragg Road on its way and very probably causing Calder Brook to burst its banks which it very nearly did in February despite the completed flood works. The steep bank down to Cragg Road is already significantly subsiding at the bottom of the proposed development area - further water run off is highly likely to cause this fragile area to collapse and there are houses directly at the bottom of this bank. Stake Lane bridleway above the proposed development area was recently shut for 6 months for flood alleviation work to take place to prevent the torrent of water and rubble that always runs off the hillside and down Hall Bank Lane into Scout Road every time there is a heavy rainfall. This alleviation work catastrophically failed during the recent flood, simply overflowing in the culvert and washing even more rubble down the road (photos and videos again available). This indicates that this area above Mytholmroyd will always be affected by significant water run-off, and it would be incredibly irresponsible and short-sighted to build on land that helps to soak up this water as it would directly contribute to more flooding and damage in the valley. We should be keeping as much green land as possible up the hill to soak up water before it reaches the valley rather than turning it into concrete for water to run straight down. Transport - Hall Bank Lane is a single track road with no footpath - there are regularly near misses between pedestrians who walk up the hill to get to work or home and vehicles driving far too fast up and down the road. The wall is unstable on one side of the road, and this will be made worse by the vibrations from increased traffic. Even if access to any new development was theoretically only from Cragg Road, it is obvious that more people and cars would use Hall Bank Lane as a short cut, making it even more dangerous. The road infrastructure of this area is simply not suitable for development - someone is very likely to be killed or seriously injured on Hall Bank Lane if this development goes ahead. Several local walking routes also use Hall Bank Lane as part of their walk. Wildlife - as previously stated, this is green belt land and a wildlife corridor - bats hunt daily over the fields under proposal for development and it is extremely likely that they also roost in this area, therefore I understand that a bat survey needs to be undertaken before any further decisions take place. The area also has deer, foxes, badgers, rabbits and a wide variety of raptors including a peregrine falcon, all of which would significantly be disrupted by this development. Historical significance of area - Scout Rock and the surrounding area are of historical and literary significance, supporting visitors and tourism in the valley. Building up to the bottom of this areawould negatively affect the beauty of this area and therefore would likely reduce visitor income to local shops, restaurants, holiday lets etc.

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

Duty to Co-operate Reason:

I do not feel that the Council is effectively cooperating with local nature organisations or listening to the local community to fully understand the negative impact of this development

Suggested Modifications:

This development should simply not take place in this area

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5609309

Main Issues and Council Response

Legal Compliance

Main Issues:

1. Flooding - Surface water flooding, increase in flood risk, lack of appropriate drainage.

2. Local road network, specifically road safety, congestion and site access.

3. Ecology.

4. The land is unstable.

5. Use of this Green Belt would be a blot on the landscape.

6. Inadequate public consultation.

Council's Response:

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

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

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

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

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

6. Extensive and inclusive consultation has been carried out throughout all stages of the Local Plan preparation process in accordance with the Council's adopted Statement of Community Involvement and is detailed in the Consultation Statement (Regulation 22).

Test of Soundness

Main Issues:

1. Site access - Hall Bank Lane is unsuitable.

2. Flooding - Surface water flooding, increase in flood risk. Loss of storm water storage area. Impact on Calder Brook.

3. Ecology - impact on wildlife, including three species of bats, deer, variety of raptors, stoat, various species of bees. Impact on Broadhead Clough SSSI.

4. Need to consider the potential of all brownfield sites first.

5. Local road network, specifically road safety, congestion and access to the site. Impact on New Road bridge.

6. Impact on heritage, namely Scout Rock and areas of literary significance. 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. Loss of Green Belt

8. Increase traffic congestion.

9. Impact on skyline of Mytholmroyd.

10. Loss of public rights of way.

11. Impact of residential amenity for existing residents, including increase in noise and light pollution and loss of light.

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

13. Employment allocation LP1622 at Mytholmroyd has been revised to a mixed-use live/work development. No evidence has been submitted to demonstrate why this allocation has been revised to a live work development and the implications on housing or employment numbers.

14. Concerns regarding co-existence of residential and business uses on the site.

Council's Response:

1. Highways Development Management consider that access is only suitable from Cragg Road, and an assessment of Cragg Road is required up to junction with A646 Burnley Road, and improvements at existing vehicle access onto Cragg Road would be required with any intensification. A Transport Assessment will be required.

2. The site is located in Flood Zone 1 and no surface water drainage issues have been reported previously. The Council's Flooding and Drainage Section consider the site to be suitable for development subject to an evaluation of the existing surface water drainage network, site investigation and implementation of mitigation measures. These could include the application of green and blue infrastructure on site such as SuDS. The NPPF makes it clear that 'inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary,

making it safe without increasing flood risk elsewhere'. Supported by the Calder Catchment Strategic Flood Risk Assessment 2016 (SFRA), the Local Plan is focused upon managing flood risk from all sources and applying a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change.

3. The Conservation Section (Ecology) has indicated that development would be acceptable subject to various mitigation measures which have been included as site specific considerations.
West Yorkshire Ecology state that the site is within 1.9km of Broadhead Clough SSSI and the South Pennines SAC/SPA , and encroaches on the Wildlife habitats network. The land around the site has potential to be used by SPA birds, and a Habitats Regulations Assessment is likely to be required.
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 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.

5. It has been recognised that Hall Lane is not a suitable access, and therefore access will need to be taken from Cragg Road. Highways Development Management have also stated that improvements at the existing vehicle access onto Cragg Road would be required.
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.
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.
A Transport Assessment in any planning application would need to assess impact on local road network. Road Safety would be assessed as part of any submission.

6. A Heritage Impact Assessment has been undertaken which identifies mitigation measures to minimise any potential harm of development to the setting or views of heritage assets, and also to enable enhancement.
Policy HE1 of the Local Plan sets out a clear and positive strategy for the conservation, enjoyment and enhancement of Calderdale’s historic environment and should be considered in conjunction with guidance provided in the National Planning Policy Framework, and planning policy guidance. It should be noted that this policy does not seek to unnecessarily or entirely prevent development which may affect a heritage asset. Instead, it aims to ensure that development proposals are sympathetic to heritage assets in that their significance and settings are understood, respected and either conserved or enhanced whilst safeguarding against their exploitation or endangerment. This will ensure a sustainable future for heritage assets, and for the historic environment as a whole. The 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. The purpose of the Green Belt Review is to provide an understanding of the current strengths and weaknesses of the existing Green Belt and provide the basis for recommendations to change the Green Belt where appropriate. In order to assess Green Belt land against the NPPF purposes, a set of questions for each purpose has been developed including the need to prevent neighbouring towns from merging into one another and to preserve the setting and special character of historic towns.
In terms of the site assessment process, in order to identify the most sustainable sites a 'sequential' approach to housing allocations has been adopted that prioritises brownfield sites in the urban area, only using the most sensitive Green Belt when all alternative sites were used.
Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the Council has examined fully all other reasonable options for meeting its identified need for development. Document EV 09 Exceptional Circumstances for the Release of Green Belt (2018) considers the process that the Council has followed in relation to the potential need to release land from the Green Belt.
The proposed changes to the Calderdale Green Belt are clearly a last resort and have been minimised. Furthermore, the boundary changes are essential to achieving a sustainable future for Calderdale – one that reconciles economic, social and environmental sustainability.

8. The Council considers that the evidence submitted supports and justifies the content of the Local Plan. The Council has commissioned transport modelling that is robust and fit for purpose. The 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. In addition, the Transport Assessment in any planning application would need to assess impact on local road network.

9. The site lies within the Special Landscape Area. 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.

10. Where sites contain public footpaths, schemes will be expected to incorporate this in their layout, or if ultimately necessary, arrange for a suitable diversion.

11. Policy BT2 - Privacy, Daylighting and Amenity Space of the Built Environment Chapter ensures that development proposals do not result in a significant adverse impact on the privacy, daylighting and private amenity space of adjacent residents or other occupants and provide adequate privacy, daylighting and private amenity space for existing and prospective residents and other occupants.

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, education provision, utilities and public transport.

13. The site is appropriate for the provision of small live work premises, due to the nature of existing employment uses on the site and its location, and such a use is compatible with neighbouring residential properties. The change of allocation from employment to mixed use, retains the provision of employment premises, but also enables the provision of additional homes to meet the housing requirement.

14. The work component will be limited to B1 uses..

Duty to Co-operate

Main Issues:

1. Flooding - Surface water flooding, increase in flood risk.

2. Local road network, specifically road safety, congestion.

3. Ecology

4. Lack of co-operation with local nature organisations and the local community.

Council's Response:

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

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

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

4. This issue has been responded to under 'Legal Compliance'.

Suggested Modifications

1. Remove the 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 allocation of the site is considered to be consistent with the Council's site allocation methodology and positioning in the trajectory as set out in the Housing Technical Paper. Document EV 51.1 Site Allocations Assessment Methodology - Publication Draft (2018) details the process the Council has followed in relation to the site assessment process. The document outlines the various stages of assessment from initial site identification to the implementation of the Sequential Approach.

2. 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: 9 Todmorden Additional Mixed Use 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:

Document Section: Site number LP0327 Land off Halifax Road, Todmorden, OL14 5AT

Representations

Comment ID **HRU1822** Site ref (if applicable):

Person ID: **1245761** Name: **Ms Susan Miles** Organisation: **Todmorden Town 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?: **Yes**

Sound Reason:

Todmorden Town Council broadly supports the designation of this site in the Local Plan for a mixed use development including a community facility, retail units, eateries, housing, car parking and landscaping. Also, TTC has commissioned a Housing Needs Assessment which is currently in progress. The report will be shared with Calderdale Council when it is received.

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 **HRU1867** Site ref (if applicable): **LP0327**

Person ID: **1246253** Name: **Mr Fraser Tomlinson** Organisation: **Environment Agency**

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:

LP0327 - Land off, Halifax Road, Todmorden We understand this site may have been impacted by the recent flood events. Site specific Hydraulic Modelling and FRA required. No more vulnerable or highly

vulnerable uses on the ground floor. Emergency Access and egress plans must be provided to the LPA for consideration and agreement (See attachment).

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/5628156

Comment ID **HRU2256** 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 yourauthority, aiming to agree wording to effectively tie the recommendations of the Heritage Impact Assessments to the relevant Local Plan policies. If it is proposed to proceed with the additional site allocations we recommend this would also apply to those sites.

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

Duty to Co-operate Reason:

Suggested Modifications:

Amend Site Specific Consideration to ensure no harm to setting of heirtage assets in the vicinty.

Comments:

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

Main Issues and Council Response

Legal Compliance

Main Issues:

Council's Response:

Test of Soundness

Main Issues:

1. Environment Agency has commented that this site may have been impacted by the recent flood events. Site specific Hydraulic Modelling and FRA required. No more vulnerable or highly vulnerable uses on the ground floor. Emergency Access and egress plans must be provided to the LPA for consideration and agreement.

2. 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. Environment Agency comments to be integrated in site assessment summary where appropriate.

2. 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. Environment Agency comments to be integrated in site assessment summary where appropriate.

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

Council's Response:

1. Agreed. Environment Agency comments to be integrated in site specific considerations where appropriate.

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: 10 Elland Additional Housing Sites

Representations

Comment ID **HRU1006** Site ref (if applicable):

Person ID: **1243834** Name: **Mrs Sarah Chadwick** 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:

Inconsistent with national policy regarding the climate crisis / flooding / wildlife and ecology and pollution. Traffic / pollution Anyone who navigates West Vale traffic lights to get to, and return from, daily employment should not need further argument as to why this proposal is unsound. The standing traffic with running engines for hours at peak times daily is already challenging safe levels of pollution and environmental impact. Any significant addition (between 200 and 600 houses as proposed) to this traffic suggests a total lack of understanding of the local infrastructure. It would be misleading (naive at best) to suggest that every one of the new builds would not also have at least one commuter through this terrible bottleneck. Traffic solutions / improved public transport links must be appropriately addressed before any consideration of increased population can happen. Environmental Flooding! Alternatives Have alternatives really been thoroughly investigated before this very lucrative green belt land was suggested? It is not at all surprising that developers are showing an interest in this area of Calderdale when local house prices are considered. However, is 'selling out' national policy and local interests in the name of short sighted profiteering really something that Calderdale's residents should accept?

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

Duty to Co-operate Reason:

Lack of clear information for local residents.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1153** Site ref (if applicable):

Person ID: **1243904** Name: **Miss Jayde Crow** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

I would like to strongly object to the planning proposal that is being considered for hundreds of house to be be built on greenbelt land in the greetland/westvale/elland areas of Halifax . I now list my reason's for objecting against this proposal. This area is rife with animals including rare and protected animals deers, foxes, newts, kingfishers, kestrels, herons, squirrels and many more! The school or doctors surgery in the area would not be able to deal with an influx of people as they are all overcrowded as it stands now No air quality assessment has been undertaken in this area so we don't even know the extent of air pollution before the proposed development. The area concerned floods at least once a year in varying degrees ; the worst instances have been Boxing Day 2015 and recently 9thFebruary 2020, the development will have a significant detrimental impact on flooding. The run off into Black Brook will cause serious downstream effects, for example, the floods of 9thFebruary saw Greetland Cricket Club, Heath Rugby Club and Clayhouse Park all under water ; so it is hard to understand how any flood plan could mitigate against the risk of even more severe flooding in West Vale leading to major issues for all the businesses and residents. It is impossible to understand how the proposals in the local plan can be in any way aligned to the recent declaration by Calderdale Council of a climate emergency. These proposals will inevitably lead to a flooding emergency, probably not what the Council had in mind by its declaration. Traffic in the area during rush hour is very congested and rush hour is more like 2 hours I can only imagine the chaos if all these homes were to be built. There are numerous mainwater pipes bursts around this area along with power cuts quite frequently. Please consider the lifes of the people and animals already living in this area and how they will be highly effected if the high volumes of houses we're to be built for exapmle health, education, commute times, safety due to higher crime rates and lack of emergency services,the risk to life due to excessive flooding caused by building on flood plains &' the loss of habbits to animals.

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

Sound Reason:

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1207** Site ref (if applicable):

Person ID: **1243222** Name: **Mr Matthew Houlton** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

Not qualified to pass comment on the plans being legally compliant.

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

Sound Reason:

I do not believe the plans for additional development off Saddleworth Road to be sound for the following reasons: 1) Lack of long term traffic management plans. West Vale is already not capable of coping with the traffic volumes through the two sets of traffic lights. This makes it difficult and often dangerous for pedestrians and cyclists in the area. Additional development in the area would add significantly to the traffic volumes and so make the area even more dangerous and make healthier modes of transport (cycling and walking) even less appealing. I believe a wider plan of the area needs to be developed to enable more walking and cycling based on current vehicle volumes before any further developments can be considered. 2) Infrastructure. The plan would lead to significant increases in the population in the area but no mention has been made on the supporting service infrastructure. Medical and education provision is already at stretching point in the area so before any additional housing can be considered then a review would need to be performed. A balance would be needed between new housing and provision of new services to support. 3) Wildlife. Lastly but by no means least is the impact the proposed development would have on wildlife. The area supports a diverse habitat with species not widely found in the area and so should be protected. In particular bats, owls and dippers can be found in and around the stream. We have again seen flooding in the area this winter and the grass meadow is often waterlogged as you would expect. Building on the valley would prevent this natural protection and potentially cause flooding issues either in the area or downstream. I understand the need for additional housing but believe on balance that with the issues that the sites off Saddleworth Road present, far better alternatives are available so these sites should be removed from the plan.

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

Duty to Co-operate Reason:

Suggested Modifications:

Sites off Saddleworth Road to be removed from plan

Comments:

Additional Evidence Link:

Comment ID **HRU1233** Site ref (if applicable):

Person ID: **1243929** Name: **Mrs Rachel Taylor** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

please refer to below

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

Sound Reason:

Percentage wise this is a huge increase in the housing stock particularly in the Greetland area. As sites LP26, LP177, LP953 and LP1625 are so close in proximity they cannot be viewed individually as the overall impact of the local plan would be catastrophic to Greetland as a whole and the surrounding areas. Under the Calderdale Review of Polling Districts 2019, the number of properties per polling district is as follows: Greetland 1221, Sunnybank 505, West Vale 1119. This totals 2,845 properties. As LP0026, LP0177, LP0952 and LP1625 are all in immediate vicinity of Greetland and Sunnybank wards, combined this would see 543 additional new houses built in this distinct community on top of capacity allocated in the 2018 plan. As a percentage of the 3 wards this would see a disproportionate growth of 19% or 22.4% when adding in the 2018 site allocations. It could also be argued that the West Vale Ward is a community in itself (having its own primary school) which would take growth of Greetland and Sunnybank to 31.4% or 33.8% when including 2018 allocations. Previous potential sites which were considered and consequently rejected (report CC37) stated that it would give a "disproportionate increase to Barkisland village". The increase based on the same dataset above would have been 16.6%. which is far less than the huge potential increase of up to 33.8% in Greetland. If this plan was to be passed, surely that would show a great inconsistency in policy and legality regarding planning applications. NPPF (para 133/ 134) also states that aim of Green Belt policy is 'to prevent urban sprawl' and 'to prevent neighbouring towns merging into one another.' The location of this proposed site would go against that ; there would be less clear boundaries between Greetland and Barkisland and the distance from local amenities would become an issue. Save Our Greenbelt: Save Our Greetland Greenbelt The greenbelt land in Greetland is classed as highly sensitive on the Local Plan and has been designated as a -“ wildlife corridor "It is important to all and used by many. There are fields leading down to the Black Brook where wildlife (some of it protected) including deer, badgers, herons, barn owls, woodpeckers, king fishers and bats thrive. The river, trees and farmland provide amongst other activities space for family walks, cyclists, dog walkers, nature rambles by local children. Surely we do not want to lose this space? All of this would be lost should the 600+ properties be built on the green belt land identified. The revisions to the plan (i.e. the addition of the new sites) proves further unsustainable development with a disproportionate amount of new homes proposed across four sites in Greetland with 1,041 additional units of the 1,708 on new housing sites (over 60%) proposed in the Elland area. There are previous plans for a greenway to be extended along the wildlife corridor so that more residents can take advantage of the nature offered by Greetland. Let's do this! I also refer to the National Planning Policy Framework (NPPF) Feb 2019 para 137, point c which covers that building on greenbelt should only be considered in exceptional circumstances. I ask -“Has brown field development in this area really been exhausted?"Can we not re-utilise these sites ahead of greenbelt (for example the plot where a mill has been demolished at West Vale). There would be an increase in noise and light pollution spoiling the rural aspect of our village. Air Pollution The Clean Air Strategy 2018 quotes that while we do need to ensure economic growth, we also need to realise the cost of air pollution on health. The recent research commissioned by Public Health England shows that air pollution affects the population by increasing health and welfare costs by up to Â£18.6bn by 2035. It is found that the single biggest air polluter is traffic. Such building along Saddleworth Road would lead to an increase in the traffic heading through West Vale traffic lights. Calderdale Council are aware that the traffic volume at West Vale is already at 117% with daily queues already leading back from the traffic lights up as far as the school. Surely the traffic fumes and sheer volume of more impatient drivers is a risk to the safety, health and wellbeing of the 4-7 year olds who attend the Sunny Bank Annex of Greetland School? We are already waiting for an accident to happen here or from increased volume of traffic further through West Vale at the West Vale School. Flood Plain Do we really want to build on this land which has proved in the past to be subject to flooding from the Black Brook? Calderdale have declared climate emergency! I attach my photograph to show the recent flooding effect on this plot. It seems irresponsible to build here when such flooding would lead to insurance being unavailable followed by questions around why Calderdale Council allowed building here. -“I understand that Councils are stuck between the Government demands for housebuilding and the difficulties of identifying suitable sites however I urge you to look at the planning policy and the

relationship between housing numbers and the pressure of flooding"Cllr Swift. The current village of Greetland is built on a hillside and there are hundreds of springs which appear after heavy rain throughout the year. These springs have increased in volume and quantity since earlier building projects in the Greetland area. All of this excess water heads down through the areas identified for building on their way to the Black Brook. With buildings in the way there will be huge impact both locally and further downstream at Elland Bridge. The water has nowhere else to go! Diverting these springs leads to flooding of land which has not been flooded before. According to www.environmentlaw.co.uk the wide scale flooding incidents in the UK and the threat of climate change, new developments in flood risk areas would only be allowed when it is exceptionally necessary and when it does not increase the risk of flooding in the developments, the community or elsewhere. We need to question the Council's Sustainability Appraisal process to support the release of the new sites with the site at 'Land adjacent Ellistones Place' (Ref: LP0177). This appears to be a completely unjustified recommendation. The site report states that the assessment of SA7 is 'Negative' and marked 'RED' commenting that ''Overall the impact is negative as the site is greenfield and lies within flood zones 2 and 3''. Based on this information this site should be excluded! Infrastructure School ; The Greetland School has some 400 pupils and is outstanding. We know why the land would seem a great prospect for these building plans. However the school is full ; it cannot take the extra children who would be in the proposed developments. It is also worth noting that the proposed housing would be the prime catchment area for the school so that children at the top end of the village, where the 7-11 year olds attend, would lose out on places at the school. This is despite the fact that para 94 of the NPPF states that it is -“important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive positive and collaborative approach to meeting this requirement"Doctors/dentists ; Again the facilities for the Greetland population are already at breaking point ; where is it planned that the extra population will be accommodated? Public Transport - Saddleworth Road buses are shockingly poor as it is. But be aware that putting on more buses will only increase the traffic situation around tight corners at West Vale. Sewers ; these are over flowing with Saddleworth Road and the surrounding roads which lead into Saddleworth Road are constantly being dug up to resolve leaks and blockages. Conclusion This all adds up to the fact that the proposed plan is not sustainable in NPPF terms. When the harm Identified is taken into account then the proposal do not amount to sustainable terms!

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

Duty to Co-operate Reason:

As a Greetland resident I can confirm that I have received nothing official from Calderdale Council regarding the development of the sites along Saddleworth Road. Thank goodness for Facebook.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1299** Site ref (if applicable): **LP002**

Person ID: **1243955** Name: **mrs Denise Offord** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

I feel that this will harm the local wildlife and there must be Brown field sites which could be used rather than destroying Green Belt land. We are asked to look after the environment yet the council wants to harm it.

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

Sound Reason:

More traffic creates more air pollution, West Vale is bad enough now, queueing traffic creating more fumes. Even though there is a by-pass a huge amount of traffic already comes through West Vale and even when the new road is built I think it will struggle to cope with the amount of traffic we get. As a resident who often struggles to park outside their own home more development will make it even worse. The area is already liable to flooding, building houses will reduce natural drainage, at a time when there is concern over householders having flagged patios instead of gardens, building houses on this land will contribute to this problem. Elland is a historical Town new development on this scale will have a negative effect on the whole area. There are various paths in the where people go with their children and dogs, at a time when we are told to do more excercise some of these areas will be lost. It is already difficult to get a doctor/dentist appointment. Recently one of the Elland Doctors surgeries was closed, where are all the extra residents(end existing ones) expected to go.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1419** Site ref (if applicable):

Person ID: **1243976** Name: **Mr Peter Cowey** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

The proposed "10 Elland Additional Housing Sites" is not sound primarily because: Road transport infrastructure is already inadequate specifically in West Vale where Saddleworth Road, Rochdale Road and Stainland Road converge producing lengthy peak time delays for residents of Greetland and Stainland going to/from Halifax, Elland and all towns to the east or the M62. Traffic generated by a further 600 home would clearly gridlock the area unless a substantial West Vale bypass were to be included. This would

appear to be both difficult and costly. Besides the economic cost of transport gridlock, the poor occupants of West Vale including the Junior & Infant School endure air pollution, noise pollution and higher road safety risks. A bypass is unlikely to fully mitigate these issues.

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 **HRU1443** Site ref (if applicable):

Person ID: **1243997** Name: **Mrs L Wood** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

Whilst there have been discussions in the plan of wildlife and flooding, there is no mention of the economic effect our social problems of these houses i.e Local amenities; schools places for additional residents; increased volume of traffic to an already congested village; increased impact of places on local doctor or dentists places.

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

Sound Reason:

there is no mention of the economic effect or social problems of these houses i.e Local amenities; schools places for additional residents; increased volume of traffic to an already congested village; increased impact of places on local doctor or dentists places. what is being put in place to cater for these extra 1,000 residents? Without that in the plan, it appears negligent of our council to build homes that cannot be supported locally.

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

Duty to Co-operate Reason:

Suggested Modifications:

Detailed plans on improving traffic flow through the villages; increased places at schools therefore more classes and teachers &buildings; adequate public transport ; additional places at doctor surgeries/ nhs dentists & so additional requirement of doctors/ nurses/ dentists; adequately examining public leisure facilities / POI arms and green spaces for the new residents.

Comments:

Additional Evidence Link:

Comment ID **HRU1466** Site ref (if applicable):

Person ID: **1244002** Name: **Mr Guy Hirst** 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:

LP0026 LP0026. The site is subject to surface water flooding. It is clear on very recent evidence that building here will only exacerbate the likelihood of flooding issues downstream. Housing nearby already floods Additional housing in this area will lead to extra traffic at West Vale, a confluence of roads which is already unable to properly deal with current traffic because of the two major road junctions.The problem is made worsebecause of the concentration of water and gas services in that village which are frequently needing repair and replacement increasing congestion and thus delaying road users. Current gas main laying proves this (6 January 2020 to date) Alternativeimprovement tothe road layout is not economically viable Traffic issues at the Saddleworth Road/ Stainland Road junction is already made worse because of the five road congestion

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

Duty to Co-operate Reason:

Suggested Modifications:

Remove sites LP0026, 0177, 0952 and 1625 from the plan

Comments:

Additional Evidence Link:

Comment ID **HRU1474** Site ref (if applicable): **LP0026**

Person ID: **1243991** Name: **Mrs Diane Kershaw** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

Objection by Diane Kershaw ; 23 February 2020 I am writing to register my objection to part of Site LP0177, which I believe, lies within flood zone 3A ; the highest classification of flood risk. Preventative Measures Has an Environmental Agency Scientist been employed to measure river flow, how fast Black

Brook floods and whether its banks are eroding in order to protect the surrounding area and ultimately West Vale further downstream? Have Hydrologists studied the flood plain in its original state compared to when there are heavy floods? If the development goes ahead, the area will have less capacity to absorb the rainfall. It is normal in very wet weather for the fields to absorb the water like a giant sponge subsequently releasing it more slowly without overwhelming the water courses. If the green belt is covered in concrete and tarmac, the land has no capacity for retention, water will simply rush straight down with inevitable consequences. Could existing and future residents be reassured by the Inspector at Calderdale Council that every effort has been made to study the Environmental Agency's detailed reports? What plans have been put in place for the excess water go if development takes place? Another scenario which has hit the headlines many times and the area was visited recently by the Environmental Minister, is Mytholmroyd/Hebden Bridge. There is photographic evidence of flooding for well over 100 years and is still causing destruction. What has been learnt from this to prevent the same situation happening in Greetland/West Vale in the future? I have never heard of West Vale flooding and pray this does not happen in the future. Who is ultimately accountable for the flooding in Mytholmroyd and Hebden Bridge for over a century? We cannot sustain these 'rare' incidents which are now occurring many times in a decade! Who will be accountable when it's too late should the development in Greetland go ahead? Infastructure What are Calderdale Council's plans for upgrading the infrastructure ie pre-schools, primary schools, doctor's surgeries, dentists and road network improvements to alleviate traffic congestion if the large housing development takes place? The air pollution is at a considerably high level at the moment and you can smell the exhaust fumes (see British Heart Foundation's report on our area). Toxic air potentially affects the normal electrical function of the heart and stays in the blood stream for at least 3 months! What impact does this have on children and parents walking to school now and in the future? The particularly congested roads in West Vale and Stainland Road leading to and from Greetland Academy and preschool, particularly at peak times, already causes a problem with parking and pedestrians are walking through pollution caused by the already excessive number of vehicles. Has anyone from Calderdale's Environment Department measured the pollution levels and can the Council's results be viewed anywhere online now or in the future please? Flooding Calderdale have declared a climate emergency and having records of the flood plain in its natural state over many years, I was shocked and surprised to learn of the proposed development in Greetland and in particular at the back of Woodfield Drive. Whist walking in the area and viewing photographic evidence, particularly over the last month, the amount of flooding to the land and river in this area and its effect on home owners. With a greater risk of flooding, will residents and businesses be able to afford the inevitable increases in insurance premiums? 'Eye on Calderdale' document states that sometimes developers who are allowed to build on floodplain land are asked to contribute to the cost of flood protection measures as part of the planning process. Would this be put in place if the proposed development goes ahead? Also a quote from the Environment Agency, 12/2/20 Evening News, BBC Look North as follows, -“Unfortunately, the Calder valley is at unique flood risk. It's a very narrow steep sided valley and it doesn't take much to see flooding throughout the catchment right down through many communities. We see rapid onset flooding; low onset flooding as well and quite a high risk to life."Adrian Gill, Environment Agency. When a sudden high volume of water rushes down a water course, the force disturbs all kinds of debris taking it downstream potentially causing blockages and further flooding. Flooding also overwhelms the drains causing sewerage to spill out to the surface. This is not environmentally friendly and I assume that a Hydrologist, has assessed this? Will flood defences be put in place if this development takes place? As well as Greetland, surely the proposed development would have detrimental implications for the residents in Calderdale ie. lower Greetland and West Vale. Costly work has to take place each time a large area floods. This causes disruption to roads causing traffic problems and this has an effect on pollution. The pollution issue would increase permanently if the proposal goes ahead. The cost to residents, shopkeepers and the Council in this area will be significant and some will be not be able to get insurance. The fields and meadows at the moment, absorb water like a giant sponge. When its pouring down with rain, it is important to find out how fast the river is flowing and if the river is flooding, whether its banks are being eroded in order to protect the houses, villages and ultimately West Vale from

flooding. The Council's identified flooding implication of the proposed development in Greetland would have far reaching implications for the residents of Calderdale. During the Boxing Day Floods in 2015, Elland Bridge was destroyed and resulted in a very costly rebuild, a rebuild which took over a year, causing significant disruption to residents of Calderdale. Work is still undergoing on building flood defences in and around Mytholmroyd which did not prove successful during the recent floods in February 2020 The traffic problems we encountered, the effect on air pollution, the financial cost to the council as well as local businesses was a well talked about issue within the area. It was a disaster. Nothing has been done to make the flooding less serious in this particular area and water levels peaked again over the last few weeks. How much more can people cope with? The council has spent millions of pounds on flood defences, which does not seem to have any effect in areas in the Calder Valley. Work to prevent flooding is the Environmental Agency's responsibility. My husband and I regularly walk on the public right of way running the stretch of the proposed development and we have seen first-hand the extent of flooding in this part of Greetland. Homes on Woodfield Drive could be flooded due if this development takes place and will continue to affect insurance premiums, not only there but other areas. We need to think about people's quality of life the stress it causes not only the elderly but all concerned. Residents could have a bleak outlook now after living in beautiful and safe environment. The NPPF is clear that, -“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk"Has the Council adhered to this policy? We need to think about the effect on birdlife such as Herons, Kestrels, Kingfishers which are seen and enjoyed in this area. Is there a report on the effect on agriculture and ecology should the proposed development go head. Public Right of Way My husband and I enjoy walks with our grandchildren along the public right of way which stretches along the development. The tranquil setting of this public amenity provides us with a space to exercise and have quality time in a fun, educational, safe environment. We all enjoy the abundance of wildlife in this area. The Council and residents have a duty to protect and enhance public rights of way and access within this area. The recreational value to the Black Brook area, which over 300 residents are trying to protect will lose its tranquillity and public right of way. It will become closed in and could become unsafe due to excessive flooding and damage in the future and could become unsafe for future home owners should these houses actually sell! There will be a long standing history of concerns logged against this proposal. The NPPF states that the Local Plan should create safe accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion. Traffic Issues and Air Pollution There is no mention of the drastic increase in traffic and air pollution within the plans for the proposed development. Traffic is already a problem during most part of the day with the traffic lights at West Vale, for many years, not coping with the amount of traffic. Calderdale are assessing the situation at the moment and I have no record of how long this has been ongoing. This is a major issue and is not revealed in the consultation document. Due to the existing issues West Vale faces with traffic congestion and presumed air pollution, a traffic report is required and operational assessment of local road networks. It seems to me that the land put forward for the Local Plan, in Greetland, has been done so without an operational assessment of the local road network. Again, if this has already been assessed, can the residents view the report on the outcome. I attach photographic evidence of the flooding at the back of the houses on Woodfield Drive for your attention. This sensitive area of green belt should be protected. I look forward to receiving a comprehensive report of the outcome of the objections made by all concerned.

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

Sound Reason:

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5609802

Comment ID **HRU149** Site ref (if applicable):

Person ID: **1241820** Name: **Ms Bessie Macaskill-Telfer** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

I write regarding the proposed building of 600 new homes in Greetland, on green belt and brown belt land adjacent to Saddleworth Road. I am a third generation of my family and have lived in Greetland all of my life, and have seen many changes to this village. Estates built on this hill during my 61 years have expanded the village and, in my opinion with exception to the lovely green belt land which surrounds our village, Greetland is full. The current proposal to build these new homes on land which regularly floods, is ludicrous. The land is truly not suitable for homes. If this proposal goes forward, then the consequences will be devastating, not only to the new homes, but to existing dwellings, the wild life, and more importantly, the health of the people of Greetland and West Vale, not forgetting the traffic pollution and the congestion at both sets of traffic lights in West Vale which, I am sure you will have already been made aware of. The proposal for new housing on this site was withdrawn a number of years ago for these reasons, so why on earth has this new proposal been allowed to go so far forward, giving the people of Greetland less than one month to object, to have this stopped. I am a single voice, I am passionate about this village, and I worry about the generations to follow. Please stop this now. Do not destroy this land. Consider the residents of Greetland, and allow the younger generation to enjoy the green belt as it is.

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 **HRU1514** Site ref (if applicable):

Person ID: **1244055** Name: **Mr Andrew Wood** Organisation: **Consultant Planner CPRE West Yorkshire**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

It is necessary to look in detail at the unacceptable harm and unsustainability of development that would result from the proposed additional allocations at Greetland. LP0026 (Gate Farm) and LP0952 (New Gate Farm) - In addition to the constraints noted in the Council's site assessments, we also consider that development of these two sites would constitute unacceptable harm to the landscape, and we will prepare further evidence on this for our Examination hearing statements. LP0177 (Ellistones Place) and LP1625 (Silverdale Terrace) - We consider that development south of Saddleworth Road at these sites compromises the retention of a defensible Green Belt boundary and harms the visual and recreational amenity of Greetland. Further, the eastern portion of LP0177, south and east of the primary school, can only realistically be accessed by constructing a road on the flood plain of Black Brook, which would have severe consequences for the ecological function, character and recreational amenity of the wildlife corridor, as well as putting at risk the ability of the floodplain to absorb and mitigate flooding. In CPRE's view, since the harm that results from these specific site allocations is unacceptable, this weighs significantly against the justification of exceptional circumstances for their release from Green Belt. Put another way, it strengthens the need to show that all reasonable alternatives have been considered.

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

Duty to Co-operate Reason:

Suggested Modifications:

Review the site allocations in line with our comments at section 5, and delete these proposed additional allocations.

Comments:

Additional Evidence Link:

Comment ID **HRU1545** Site ref (if applicable):

Person ID: **1128267** Name: **Powers** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

Calderdale's Brownfield Land Register is inadequate, unhelpful, out-of-date and does not meet the Government's 2017 Regulations.

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

Sound Reason:

See attached comment.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610092

Comment ID **HRU1709** Site ref (if applicable):

Person ID: **1244178** Name: **LYNDSEY ASHTON** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

I do not believe that the Local Planadheres to legislation set out in The Climate Change Act 2008 (2050 Target Amendment). I am not able to see any evidence of additional measures to respond to climate impacts of above-trend growth in employment and housing.

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

Sound Reason:

Objection to Local Plan Allocation Numbers LP0177, LP0952, LP1625 and LP0026 Flooding ; Part of the land allocated in the Local plan is allocated as Zone 3a, and it is at the bottom of the chain of development. Development is only acceptable if sequential and exceptions tests area passed. There have been no such tests carrier out. There is clear, extensive evidence that this site floods and on a much larger scale than is represented in the site report. Green Belt ; adverse impact arising from allocation on land identified as Most Sensitive Green Belt. Heritage ; no assessment has been made of heritage impact. Sustainability and Infrastructure ; the scale of development is beyond the infrastructure capabilities of the village. The site is not sufficiently sustainably located to accommodate the scale of development proposed. Traffic Impact ; there would be an adverse impact on the Strategic Road Network. Air Quality ; the scale of development proposed would have an unacceptable impact on air quality. Open Space ; there would be complete loss of natural and semi-natural open space. Ecology ; there would be an unacceptable impact on wildlife habitat arising from the scale of development proposed. Loss of Public Amenity, Habitats and Biodiversity: Paragraph 98 of the NPPF clearly states that Planning policies and decisions should protect and enhance public rights of way and access. The site report for LP0177 acknowledges the importance of the recreational value of the Black Brook area, and hence the public right of way that allows the community access to this area. However, the site report wrongly suggests that the development will increase recreation pressure on the Black Brook. This simply will not be the case, due to the extreme destruction of the landscape surrounding Black Brook. The visual amenity currently provided by the site would be wiped

out by the proposed development, and by way of closing in the public right of way, the footpath would become unsafe for users, and hence unfit for purpose. I shall further expand upon these points below. The community gains access to this amenity, the public right of way, and hence Black Brook, via the entrance to the east of the junior school. If a housing estate lines, and therefore closes in and narrows the public right of way, the landscape will be significantly harmed to such a degree that the amenity will be rendered unfit for purpose. Further to this, altering the amenity of the public right of way in such a dramatic fashion will render the footpath, currently used daily and frequently, unsafe. This is because the development will result in the amenity losing its open quality. Very recently, a woman was brutally sexually assaulted in Elland, in an area that was not an open space with good visibility. This type of narrowed, long pathway attracts crime. To remove the openness and visibility of this well used public right of way will put those who use it at a considerably increased risk of crime. The NPPF states that the Local Plan should create safe accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion. The open space along this public right of way must be maintained in order to reduce the occurrence of crime, keeping this amenity a safe place for the community to continue to use. To close in the public right of way is in direct opposition with the National Planning Policy Framework. The NPPF sets out the need to protect existing open space, which this plan does only in pseudo form; it does not protect the amenity or the community using it. The proposed development along this amenity is inappropriate. The NPPF sets out the requirement for support of local communities through local neighbourhood plans to identify for special protection green areas of particular importance to the community, by designating the land as Local Green Space The NPPF guards against the unnecessary loss of valued facilities and services, particularly when this has the effect of reducing the community's ability to meet its day to day needs. A huge number of individuals within our community use this public right of way to walk their dogs, take exercise, and unwind and destress in the form of walks in a tranquil setting, all of which they currently have access to for free, in a safe environment. Children take great joy in walking along this public right of way, and gain valuable access to the natural world in an ever-increasing age of digitalisation. Many scientific studies have been conducted on the value and importance of children spending time outside in the natural world, science has also established a connection between spending time outdoors and the increase of life expectancy. The importance of this public right of way is evidenced in the photographs of the community protest walk, which took place along the public right of way, on Sunday 16 th February. This walk was so popular that it featured in the local and reginal press, and was even featured in the local press prior to the walk, as it was such a huge issue within the community. All land in the proposed plan was walked along during the walk. The NPPF asserts the importance of protecting areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason. This applies to the public right of way down the side of the primary school, and along Black Brook. These policies must be effectively adhered to, or they become pointless in their existence. This land is classified as highly sensitive land on the Local Plan. Along Black Brook, we currently have a wildlife corridor, which is further testament to the beauty and tranquillity of the area which the proposed development would unavoidably decimate. The introduction of non-physical disturbances to the wildlife and protected species in our area, such as noise, vibration, visual presence, human presence and light pollution, in combination with increased air pollution, given that the proposed development is in a disproportionately highly concentrated area along a condensed stretch of one road, would have disastrous effects on the wildlife corridor. In effect, we would lose much of the life we currently see along this vital public amenity. The NPPF states, under the section addressing Habitats and Biodiversity, paragraph 174, that the Local Plan must, 'protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity"¦ wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation.' The way in which this plan proposes to impose such a largescale development along the stretch wildlife corridor, when less sensitive land was removed from the updated plan, is in direct opposition with the NPPF. Developing the

land on this site would take the form of a negative response to the local context of this amenity. This proposal, by way of its drastic removal of open space ; directly related to this public amenity, unreasonably compromises the way in which the community routinely takes part, on a daily basis, in legitimate recreational activities along the public right of way. Activities and community groups like 'Little Wanders,' currently use the public right of way amenity, that stretches the length of the proposed development, which is not an unreasonable expanse of land to protect. These community walks, geared at allowing young children and their families access to free exercise and social interaction, are incredibly important to the health and wellbeing of our community. The children who participate are allowed to become more in touch with their environment than they routinely are in our ever-increasing digital world. As a result, the children become better integrated into society and are more committed to protecting the environment. It is important that the next generation is educated about their environment, within their environment. In this way, the Green Belt serves as a place of education and a means of bolstering the community. Calderdale has been identified as a deprived council. The latest government figures show that Calderdale is in the top quarter of most deprived authorities in the country. There will be serious detrimental impact on the wellbeing of the residents in this one, small area of what has been classed as a deprived council. This type of facility serves to protect and bolster mental health within the community. As stated on the Gov.UK website, 'A new study has been published by Natural England which reviews the benefits and outcomes of approaches to green care for mental ill-health"¦ A report published February 9 2016 shows that taking part in nature-based activities helps people who are suffering from mental ill-health and can contribute to a reduction in levels of anxiety, stress, and depression.' At a time when mental health is arguably at crisis point, designated areas where individuals and community groups know they can visit are invaluable. Designated spaces like the popular amenity public right of way in Greetland, which runs alongside our precious wildlife corridor and Black Brook, can afford communities free and easily accessible facilities, facilities which the council can cheaply and effectively work into mental health schemes. The importance of this site is due to the amount of biodiversity of wildlife concentrated in this area. The NPPF states that the Local Plan should take account of climate change over a long period of time, including factors such as flood risks, changes to biodiversity and landscape. The NPPF also states that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. To put the wildlife corridor at an increased risk of survival, and potentially decrease biodiversity in the area, at a time when climate change already poses a risk to it, especially given that the land is at high flood risk, would be in direct opposition to that which the NPPF sets out to protect and preserve, and for good reason. For this reason, development on this land is not environmentally sustainable. Paragraph 175 of the NPPF states that, 'When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts)"¦' which the community is immediately able to jump in with stating that this cannot be said to be the case in the Calderdale Local Plan, as land was removed from Stainland, which is far less sensitive, in terms of the risk development would pose to wildlife, biodiversity, habitat and landscape. In this way the land in Greetland put into the Local Plan is not compliant with the NPPF. Flooding: The Land put forward in the Local Plan is unsustainable. One of the reasons for this is because it is within a high-risk flood area. This factor has not been given anywhere near enough scrutiny at the plan-making or decision-making stages. The housing estate, Woodfield Drive, to the east and in immediate contact with plot LP1077, is at a direct, increased risk of flooding. Flooding is so bad in Calderdale that the Army was called in, in February 2020, in a bid to help protect persons and property from yet another severe flood. The way in which the Calder Valley routinely experiences flooding can be best understood by Labour Council leader, Tim Swift, urging the Government to grant Calderdale urgent assistance by recognising it as a 'Tier 1' authority getting extra funding support because it is one of a small number of areas of the country at "sustained risk" of flooding.' The NPPF states that planning policies and decisions should promote public safety and take into account wider security and defence requirements by: a) anticipating and addressing possible malicious threats and natural hazards... This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public

safety and security; and b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.' In February 2020, our community saw Black Brook turn into a raging torrent of water that posed significant danger to both life and property. There is not a risk of flooding in this area, but a certainty of it. A certainty that grows year on year with the ever-increasing threat of Climate Change. The way in which this valley, with its steep sides, floods is a natural hazard. Residents on Woodfield Drive routinely have to take measures to prevent their homes from flooding. We have photographic evidence of how this is a routine battle that residents face, and not enough is being done to help prevent this from happening in the future. To build on this land would sign residents and the community wider community to an unbearable, unavoidable fate The NPPF states that, 'due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere.' The topography of our area would not allow for it to be any other way than to increase the risk of flooding to the existing community. The sloping grassland, the trees and the flat flood plains of the land put forward in Greetland in the Local Plan retain an immeasurable amount of water when it really matters. No amount of 'mitigation' can compete with this. To build on this land would have catastrophic and irreversible ramifications, and not just for the immediate area, but for the areas further downstream currently protected by this precious land and the way it currently functions. Residents in Bradley were in the local press this week to express their despair at how they believed a development had caused flooding to their property. This is what a spokesperson for the residents had to say in the local press, "œWe never had flooding problems when this site was a meadow and did its job as a meadow and soaked up rainfall, releasing it slowly into the woods. Due to the topography of the area and surrounding areas, we have already experience catastrophic destruction, as seen in 2015 when a major bridge, Elland Bridge, was destroyed by flood water, causing huge disruption and economic expense. Last weekend, flood water carried a shipping container, from Greetland, downstream until it eventually crashed into Elland Bridge. The Bridge had not yet been open three years since being rebuilt due to the last flood. The council had to inspect the bridge for structural damage after last weekend. How can building houses in a high-risk flood area be inline with the NPPF's golden thread of sustainability? The economic ramifications in the form of destroyed infrastructure alone is enough to void this development proposal. Prime Minister Boris Johnson has even, on multiple occasions in the press, called for councils to stop allowing building on flood plains. As a community, and as the people who experience first-hand, all year round how unpredictable the water system is in this area, we are constantly reminded of the topography of our landscape and the surrounding areas, and the impact it already has on our lives. Over thirty million pounds has so far been spent on flood defences in Calderdale, and still we are having to have the Army called in to help protect us from flood water. It is not right to build on the land in Greetland put forward in the Local Plan. Flooding cannot be mitigated against in this area. The land as it stands, is helping to prevent further disaster, and must remain as it is. To even suggest altering the way in which this land functions is an inappropriate and irreversible gamble. It is not fair to gamble with the lives of the community, when the community is so opposed to it. The NPPF states that the Local Plan should take account of climate change over a long period of time, including factors such as flood risks, changes to biodiversity and landscape. The NPPF also states that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. To so dramatically change the function of the landscape of the sites put forward for development in Greetland would completely disregard the risk climate change poses to the community on the form of flooding. For anyone to tell us that the huge volumes of water we regularly see on this land will not affect existing property when it is disturbed, we would need to see evidence of prolonged, extensive surveying carried out all year round, and for a number of years. Understanding our complex water system, further complicated by our intricate system of natural underground springs is not easily, if ever, achievable. A testament to this aspect of our topography is evident in the numerous roads and lanes named after their relationships to water and springs. Much of what causes the problems we face in this

area is hidden underground in a network, or labyrinth, of fresh water springs. How can we predict how the water will behave after its usual pathways have been disrupted? We have already witnessed how smaller developments in the area, having interfered with the underground water course, have had disastrous impacts on other surrounding properties. If you would like to see photographic evidence to prove this, we have it prepared for you. Green Belt: The Green Belt Review carried out in 2017 considered all three of the sites ; reference numbers 065 and 339 in the review. The conclusion of this review was that all of the sites performed strongly in terms of their Green Belt function, meeting at least 3 of the 5 purposes of including land in the Green Belt. Those 3 purposes were: To prevent neighbouring towns from merging into one another; To assist in safeguarding the countryside from encroachment; To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The 0952 allocation was also considered to meet a further purpose in terms of checking the unrestricted sprawl of large built up areas. We would argue that all three of the sites should be considered to serve this purpose, it makes no sense for just 0952 to do so but 0177 and 1625 not to, given they are all inextricably linked. Development of all sites would result in the unrestricted sprawl of the large built up urban area of Greetland. The three site assessment reports carried out ahead of the consultation on the Local Plan Publication Draft in 2018 concluded that the land represented the "œmost sensitive Green Belt"Given this there is no planning policy justification to ignore that impact ; importantly carried out as part of a thorough Green Belt Review of the borough just over 2 years ago ; and now consider the sites suitable for allocation for housing. Such allocation would conflict with key purposes of including land in the Green Belt and would have a fundamental adverse impact on the openness of the Green Belt. Schools: Paragraph 94 of the NPPF stares that 'It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: 28 a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and b) work with schools. promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.' The Local Plan in Greetland has not seen any of this work done in relation to the local junior schools. As far as parents and the local community is aware the local school has not been consulted on the Local Plan. Due to the fact that The Greetland Academy and West Vale School are academies, they cannot be pushed to expand, so perhaps this is why they have not been consulted, however, this is in direct opposition to the National Planning Policy Framework, and therefore not compliant. We know that the primary school is already oversubscribed. The scale of proposed development would completely overwhelm an already oversubscribed school. Children already living in Greetland may face a situation where there is no place available to them at their local junior school. There is also a very real increased risk posed to the children of Greetland Academy, should the proposed development go ahead. Paragraph 109 of the NPPF states that, 'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.' I feel that it is my civic duty and moral responsibility to inform the inspector of the current unsafe road conditions on Saddleworth Road, in the surrounding area of the school and preschool. The school is situated on Saddleworth Road, which is already a very busy road, currently with its own safety and air quality concerns. At school drop-off/pick-up times, Saddleworth is reduced to a single lane due to the parked cars of parents, and with significant and unusually high numbers of HGVs using this road, due to the recycling plant further along the road, this makes for a hostile level of traffic and congestion at busy times, and these are the times when the children of our community are on the roads and at the greatest risk. Any further increase to traffic, especially such a significant one, due to the fact that the development is proposed for this road, and this road alone, would render the road unsafe, specifically due to the number of children on the roadside. Parents already worry about the safety of their children while using this road. Those in power should be taking measures to make the road safer, not putting vulnerable children at an increased risk. When a child is killed on this road, it will be too late. Due to the level of traffic and the type of traffic, namely the large number of HGVs, this road is not suitable for Local Plan development, especially when we consider the risk it would pose to

young children. On top of this increased risk of a fatal road traffic incident, the proposed development would also introduce a dramatic increase in air pollution. The proposed development would create a dangerous environment for pedestrians, with no option for mitigation. This road is unable to be made wider. To slow traffic down would only further exacerbate congestion and air pollution in the air that the community and its children have no choice but to breath. Traffic Impact: In the Council's individual assessments of the sites which resulted in them all being filtered and not taken forward for housing, the consultation from Highways England advised that the development of the scale envisaged would have a significant adverse traffic impact on the Strategic Road Network. Given this how can the sites now be put forward for allocation for housing when nothing has been done to either challenge those comments or address them? The sites in Greetland have not had traffic assessments carried out. Sites elsewhere in Calderdale have been filtered from the Local Plan due to traffic constraints. Given the existing levels of high congestion at the West Vale traffic lights, why has assessment not been carried out? Why has air pollution not been measured? Is it because the sites in Greetland are too appealing to developers, given the high house prices in the area, and some thing like a traffic assessment would throw a spanner into the works, as it were? Where is the Traffic Plan in the site reports for these sights? These sites have been allocated without appropriate assessment of local road networks. To say that the cumulative traffic impact is being assessed is not sufficient, especially given the scale of the proposed development. To increase the amount of traffic on Saddleworth Road, when it is already so heavily congested, and with a high volume of HGVs, by any amount of traffic, without a proper assessment is not a sustainable practice in planning terms. Air pollution: My final point I ask you to consider is the impact of the development of the health of the people in this area, particularly those who live on Saddleworth Road, especially our children, who spend the majority of their waking hours in the primary school and preschool, which are both situated on Saddleworth Road. Our ward already has the highest percentage of cars per household, and this is set to rise by a disproportionately high amount, in line with the disproportionately high number of houses proposed in the plan. A development site, within Calderdale, was thrown out for precisely the same reason. Yet, our site remains, even with such a high - the highest - percentage of cars per household. Due to the lack of public transport, because we live in a semi-rural area, the community does rely heavily on transportation by car, which would unavoidably be the same case for the new residents, should the development go ahead. A wooden fence and a strip of pavement is all that separates the children from the road. A catastrophic increase in air pollution, which is in direct opposition with government legislation to reduce air pollution, is further exacerbated by the fact that Saddleworth Road is unable to manage the current level of congestion. We have extensive photographical evidence of this. Such a disproportionally high increase in air pollution will have unthinkable implications for the children of our community. If the government has set targets to reduce air pollution then it does not make sense to allocate such a vast proportion of the overall planning to one area, along one road, where the pollution in the air will become concentrated and toxic. Calderdale Council have taken steps to reduce air pollution, but the air quality in our area has not been tested. What we as a community cannot support is a huge rise in concentrated air pollution, this is air that young children are forced to breath every day on their way to and from school, and during their time at school and preschool. These young, vulnerable children will be at a significantly increased risk of developing lifelong debilitating diseases. This is an issue the government has established as a real problem. The amount of traffic in this area would increase anyway, due to other agreed development sites in neighbouring villages, like Elland. Traffic is regularly at a standstill on Saddleworth road, and with the increase of cars on this road, we can expect to see cars at a standstill as far back as the school, which at times is already the case. We have the photographs to prove this. This will result in car fumes being pumped directly, at concentrated levels, into the delicate, developing lungs of school and preschool children. Everyone in the area will be affected by the huge and disproportionate increase in air pollution, but the children will bear the brunt of the health implications. The polluted air is heavier than clean air, and thus collects closer to the ground. The knock-on effect of this is that the toxic air will fall down the hillside, and even though the school is not as close to Saddleworth Road as Sunnybank Preschool, the school children could stand to experience even worse effects. We have a duty of care to

safeguard our children from breathing in such an exponentially increased level of poisonous air. The measures needed to avoid this are simple and easy to take. We can very easily protect these children. If you poison the children, you poison the future of the economy too. As stated on the World Health Organisation's official website, 'An estimated 3.7 million premature deaths are attributed to ambient (outdoor) air pollution, based on WHO data from 2012. Overall, higher urban air pollution concentrations increase the risk for cardiovascular and respiratory disease, cancer and adverse birth outcomes, and also are associated with higher death rates.' The single biggest air polluter is traffic, or road vehicles. More people die of air pollution than Malaria and HIV. For this reason, we cannot allow the toxic chemicals released by cars to increase so dramatically, and directly into the air around Greetland School and Sunnybank Preschool. The World Health Organisation explains that, 'One reasonwhy childrenare particularly vulnerable to the effects ofair pollutionis that they breathemorerapidly than adults and so absorbmore pollutants. They also live closer to the ground, where somepollutantsreach peak concentrations ; at a time when their brains and bodies are still developing.' These are points highlighted in the Clean Air Strategy 2018. While we do need to ensure economic growth, we also need to realise the 'cost of air pollution on health,' as stated in the Clean Air Strategy 2018. 'There are legal requirements and aspirational targets for levels of different air pollutants. The government recognises that protective health - and tackling air pollution - requires action, and is committed to improving the UK's air quality and reducing harmful emissions. The draft Clean Air Strategy, published in May 2018, sets out the case for action and demonstrates the government's determination to improve our air quality.' https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-air-pollution The above is taken directly from the government websites. The proposed plan is directly opposed to the Clean Air strategy, as the amount of land allocated on Saddleworth Road is disproportionate to the amount of land Calderdale has to allocate as a whole. The overall air pollution will be harmfully concentrated on this one road, a road with an unusually high concentration of children so close by for so much time. Each child spends approximately 7 hours a day on this road, including walking to and from school, which amounts to 35 hours a week. 35 hours a week they will be forced to breath air that is exponentially more toxic than at present. This is not acceptable, and yet is totally avoidable. Again, we support the need for housing, but simply ask that it is in a place that has less impact on the health of the community, especially the health of our children. We only ask that the life that already exists in this area is respected and not jeopardised. Sustainability: At the heart of the National Planning Policy Framework is the presumption in favour of sustainable development, which should be viewed as a golden thread running through both plan-making and decision-making. In part, the NPPF requires developers to demonstrate the economic, environmental and social impacts of a development by way of a sustainability appraisal. It is the argument of the community that the sustainability appraisal conducted for the Local Plan sites in Greetland is insufficient, as the proposed development in Greetland is actually very much unsustainable. Section 11 in the NPPF outlines what is meant by the efficient use of land. It states that the Local Plan must follow planning policies and make decisions which encourage the efficient use of land by re-using land that has previously been developed (brownfield land). This has not been close to effectively carried out in the area. We have a number of undeveloped brownfield sites in the area, which have not been properly pursued. the revisions to the plan (the addition of the new sites) represents further unsustainable development with a disproportionate amount of new homes proposed across four sites in Greetland with 1,041 additional units of the 1,708 on new housing sites (over 60%) proposed in the Elland area. In particular, scrutiny needs to be made of the Council's Sustainability Appraisal process to support the release of the new sites with the site at 'Land adjacent Ellistones Plac

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 **HRU1786** Site ref (if applicable):

Person ID: **1244202** Name: **Mr Adam Kershaw** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

The site requirements relating to the release of the land from Green Belt is not legally compliant, adequately prepared, fully justified or consistent with National Planning Policy Framework (NPPF) and accompanying Guidance(NPPG). Procedural and Legal Compliance Issues I am concerned that Calderdale council has not adhered to legislation set out in The Climate Change Act 2008 (2050 Target Amendment). I am not able to see any evidence of additional measures to respond to climate impacts of above-trend growth in employment and housing. In addition to this, I am concerned about issues actually acknowledged by the Council itself, particularly regarding traffic impacts and flooding. For issues surrounding the proposed development, regarding traffic and flooding, it would appear that the proposal is not, according to the NPPF, sustainable.When the harm identified is taken into account, the proposals are clearly deemed unsustainable. The land in this site is also unsuitable for development due to issues relating to Green Belt and Heritage Assets, and recent planning case law determined by High Court Judgements relating to the siting of Listed Buildings.Further to this, the proposals are not supported by Housing Infrastructure Fund (HIF) from Homes England, and the inadequacy of existing infrastructure to accommodate this level of growth confirms that the proposals are unsustainable. This has even been publicly recognised by our local MP, Craig Whitaker. Flooding Certainty Part of the site is allocated as Zone 3a and is at the bottom of the chain for development, with development only acceptable if sequential and exceptions tests are passed. There have been no such tests carried out. There is evidence that the site floods both severely and routinely. The way in which this happens actually protects property and infrastructure from harm caused by flooding. Mitigation can not equal or surpass the work currently done by this land as it stands. Black Brook routinely bursts its banks, taking hold of entire expanses of meadow land, posing significant danger to both life and property. There is extensive photographic and video evidence of this. Our community begs you to recognise that there is not a risk of flooding in this area, but a certainty of it. The way in which this site faces routine flooding has been well documented on the reginal news. National news is now starting to contact the pressure group. This is something we have not gone looking for, but instead finds us, due to our level of flood risk, or 'flood certainty' as it is now known within the community. We are a small village in Calderdale Yorkshire, why are we being contacted by national media outlets? The issues we face here are real and they are huge. The entire span of land on LP0177 including South of Greetland Academy School was severely flooded in February 2020 (evidence attached). Greetland Pressure Group has attracted attention from both local and regional press and TV with regards to recent flooding and proposed development. This land routinely floods and would leave any proposed development at risk along with any access roads. Development sites LP0177, LP0026, LP0952, LP1625 are critically important in alleviating any further flooding issues by soaking and storing surface water run off from the large amount of natural springs in the area. The Army was even called into Calderdale, in a bid to help protect people and property from yet another severe flood, also in February 2020. The way in which the Calder Valley routinely experiences flooding can be best understood by Tim Swift's, Calderdale Council Leader, words when he urged the government to grant Calderdale urgent assistance. Swift would like to

see Calderdale recognised as a 'Tier 1' authority, which would entitle Calderdale to extra funding support, as 'Calderdale is one of a small number of areas in the country at ''sustained risk'' of flooding.' The head of our council has even recognised the significant threat we face in this area. The topographical context of the proposal in Greetland lends itself to increased flood risks, due to the abundance of natural springs, the water course, and the steep valley sides. All of the factors that contribute towards flooding are against us. Flooding in this part of Greetland is a certainty that grows year on year with the ever-increasing threat of Climate Change. The way in which this valley, with its steep sides, floods is a natural hazard. Residents on Woodfield Drive had to take action to prevent their homes from flooding in February 2020, and not for the first time either. We have photographic evidence of how this is a routine battle that residents face, and not enough is being done to help prevent this from happening in the future. To build on this land would be to sign residents and the community to an unbearable, unavoidable fate. The NPPF states that, 'due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere.' The topography of our area would not allow for it to be any other way than to increase the risk of flooding to the existing community. The sloping grassland, the trees and the flat flood plains of the land put forward in Greetland in the Local Plan retain an immeasurable amount of water when it really matters. No amount of 'mitigation' can compete with this. To build on this land would have catastrophic and irreversible ramifications, and not just for the immediate area, but for the areas further downstream currently protected by this precious land and the way it currently functions. Prime Minister Boris Johnson has even, on multiple occasions in the press, called for councils to stop allowing building on flood plains. Part of Site LP0177 lies within flood zone 3A ; the highest classification of flood risk in terms of land that could potentially be considered appropriate for development. The zone 3A is immediately adjacent to the western and southern boundaries of Woodfield Drive. The land immediately adjacent to the whole southern boundary of the proposed 3 allocation sites is also allocated as flood zone 3A. The photographs that are attached to this submission show the flooding that has occurred on the land. Given that the land is not only identified as being at risk of flooding but is also evidenced as having flooded, there is no justification in land drainage terms to bring these sites forward for housing. Paragraph 155 of the NPPF clearly states that, -“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk"In putting these sites forward the Council is ignoring the policy requirements of the Framework. The reports compiled by the Council for all four sites on Saddleworth Road when putting together the Publication Draft version of the Local Plan in 2018 concluded that all three should be filtered (i.e. not taken forward as housing allocations) because of ; amongst other things ; flooding and drainage issues. Sequential and exceptions tests would have been necessary to demonstrate that the sites were suitable for and safe to develop. Although the Planning Inspector identified an insufficient supply of housing land following the Stage 1 examination process, it should not simply follow that additional sites are now allocated without a thorough assessment being made as to their suitability to counter the reasons why they were initially filtered. The four sites on Saddleworth Road seem to have been put forward as a simple response to the Inspector's comments with no consideration of the flooding and drainage issues associated with the land. It is clear that there are blurred lines of responsibility and accountability when serious flooding issues arise between Developers, Councils and the Environment Agency. We need accountability when reckless planning leads to catastrophic flooding issues. Green Belt The Green Belt Review carried out in 2017 considered all three of the sites ; reference numbers 065 and 339 in the review. The conclusion of this review was that all of the sites performed strongly in terms of their Green Belt function, meeting at least 3 of the 5 purposes of including land in the Green Belt. Those 3 purposes were: To prevent neighbouring towns from merging into one another; To assist in safeguarding the countryside from encroachment; To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The 0952 allocation was also considered to meet a further purpose in terms of checking the unrestricted sprawl of large built up areas. We would argue that all four of the sites should be considered to serve this purpose, it makes no sense for just 0952 to do so but 0177,

0026 and 1625 not to, given they are all inextricably linked. Development of all sites would result in the unrestricted sprawl of the large built up urban area of Greetland. The four site assessment reports carried out ahead of the consultation on the Local Plan Publication Draft in 2018 concluded that the land represented the -“most sensitive Green Belt"Given this there is no planning policy justification to ignore that impact ; importantly carried out as part of a thorough Green Belt Review of the borough just over 2 years ago ; and now consider the sites suitable for allocation for housing. Such allocation would conflict with key purposes of including land in the Green Belt and would have a fundamental adverse impact on the openness of the Green Belt. Erroneous justification of housing requirement for Green Belt release Green Belt boundaries should only be altered in 'exceptional' circumstances. This land has been identified as the Most Sensitive Green Belt. The CalderdaleLocal Plan, which has suffered from a democratic deficit throughout its many iterations, sets a targetfor housing based on pre-Brexit demographic evidenceofObjectively Assessed Need (OAN). Thismeansthat the Green Belt asdesignatedin the current UDP has had to be reviewed. The OAN is far too great and as it relates to out-of-date population projections used in Strategic Housing Market Assessment(and update)that have been superseded by lower projections in more recent Office of National Statistics releases that would result in a much lower housing target and the reduce the need to release the number of Green Belt sites. Further, the ambitionsof the Councilfor annualjobs growthover a 16 year period characteristic of a constant 'boom' inflate the requirement well beyond the realistic possibility of actual delivery. It is notresponsibleto allocate land, including a significant amount of Green Belt release,tomeet inflated housing targets based on out-of-date household projections and ambitious and continual jobs growth. The housing target needs revisiting to model scenarios reflective of evidenced-based jobs growth (rather than ambitions), up-to-date household projections (including post-Brexit population projections) and the priority to contribute to sustainable development that does not harm the environment (including the Council's Climate Emergency commitments). The Calderdale LocalPlan has been overtaken by events both demographically, economically and environmentally. At this point, the Council is proposing to adopt a Local Plan that runs entirely against the corporate ambitions of theauthority. It is simply the case that no plan at all (and reliance on the NPPF & NNPG to direct new developments, which wouldincludethe protection of sensitive Green Belt) would be better than theproposedLocal Planthat isunder examination. Disproportionate The most recent revisions to theLocal Planin response to the Inspector's letter includethe addition ofmore Green Beltsites(including LP0026, LP0177, LP0952, LP1625)for release, whichrepresents further unsustainable developmentasa disproportionate amount ofthenew homes proposedareacrossjustfour sitesinGreetland. Indeed, 1,041 additional units of the 1,708 on these new housing sites (over 60%)areproposed in the Elland area alone. There has been substantial development of land in bothGreetlandand Elland in recent years. This cumulativedevelopmentmeans that the landon Saddleworth Roadis the only remaining parcel of the original Green Belt still in agricultural use. Development of the site would erode the visitor's understanding of the extent of the original manorial lands thatGreetlandcovers. Unsustainable Development The Council's Sustainability Appraisal process to support the release of thesiteis inadequate. The site report states that the assessment of SA7 is 'Negative' and marked 'RED' commenting that ''Overall the impact is negative as the site isgreenfieldand lies within flood zones 2 and 3''. The site should be excluded on this conclusion alone, particularly within the wider context of the Council's recent declaration of a Climate Emergencyand recent flood events. Further, the report does not grapple with the issue in the overall conclusions inadequately noting that "with regards to SA7 and flood risk, the impact is negative as the site is greenfield and lies within flood zones 2 and 3" with no specific mitigation measures identified. This does not come anywhere close to an adequate assessment to justify release for development. The Sustainability Appraisal for the Local Plan has notbeenmapped or measured.The benefits of, or the opportunities for, the provision of ecosystem services by the Green Belt land directly around the urban environmentare unrecorded. Section 39 of the Planning and Compulsory Purchase Act 2004 states that a local authority exercising their plan-making functions must do so with the objective of contributing to the achievement of sustainable development. Action 5 of the EU Biodiversity Strategy to 2020 requires member states to map and assess ecosystems, whilst the Minister of State for

the Environmentreiteratesthe necessity to map and value the natural capital that make up ecosystem services, specifically in urban environments, in order to improve sustainable planning. Further, the NPPF sets out a presumption in favour of sustainable development and advises that the planning system should contribute to and enhance the naturaland local environment by a number of measures that include 'recognising the wider benefits of local ecosystems. Wildlife Paragraph 175 of the NPPF states that, 'When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts)"¦' which the community is immediately able to jump in with stating that this cannot be said to be the case in the Calderdale Local Plan, as land was removed from Stainland, which is far less sensitive, in terms of the risk development would pose to wildlife, biodiversity, habitat and landscape. In this way the land in Greetland put into the Local Plan is not compliant with the NPPF. Developer Influence Profit should not dictate planning policy, at a great cost to the environment. In relation to the rest of Calderdale, house prices in Greetland are very high. The developers have not expressed an interest in the overwhelming amount of brown field land available in Calderdale, because the return on investment is so much higher when development is passed in beautiful Green Belt land, set within a village connected to high house prices. The developer is further enabled to do this because it has a monopoly on the large-scale building development taking place in Greetland. Plans have been drawn up for the different sites within Greetland, the sites have been given different codes, and yet the land is almost entirely unseparated by anything physical; essentially, to this community, the separate plots are one piece of land, irrespective of who owns the land on the land register- the development will be concentrated in one place. Different developers have been assigned to the various codes given to our continuous area of Green Belt, however, when this is examined further, it becomes apparent that the developers largely belong to the same parent company. How can Calderdale Council resist pressure from this monopoly situation? They are already under time constraints to designate land to the Local Plan. This is a toxic situation for Calderdale, and thus renders it impossible for the council to deliver the right homes in the right places. The Local Plan in Calderdale has become entirely about developer profit, and not at all about growing the local economy for local people. Severe Lack of Infrastructure Greetland School is an Academy and therefore it is not obliged to expand. In the Council's individual assessments of the sites which resulted in them all being filtered and not taken forward for housing, the consultation from Highways England advised that the development of the scale envisaged would have a significant adverse traffic impact on the Strategic Road Network. Given this how can the sites now be put forward for allocation for housing when nothing has been done to either challenge those comments or address them? The sites in Greetland have not had traffic assessments carried out. Sites elsewhere in Calderdale have been filtered from the Local Plan due to traffic constraints. Given the existing levels of high congestion at the West Vale traffic lights, why has assessment not been carried out? Why has air pollution not been measured? Is it because the sites in Greetland are too appealing to developers, given the high house prices in the area, and something like a traffic assessment would throw a spanner into the works, as it were? Where is the Traffic Plan in the site reports for these sights? These sites have been allocated without appropriate assessment of local road networks. To say that the cumulative traffic impact is being assessed is not sufficient, especially given the scale of the proposed development. To increase the amount of traffic on Saddleworth Road, when it is already so heavily congested, and with a high volume of HGVs, by any amount of traffic, without a proper assessment is not a sustainable practice in planning terms. Heritage No assessment has been made of heritage impact The site assessment reports carried out in advance of the 2018 Publication Draft identified other areas of policy conflict with all three sites ; in particular heritage, open space and sustainability. It was at that time recommended that none of the sites on Saddleworth Road should be allocated until an assessment had been made of the heritage impact. To our knowledge that has not occurred. The sites were identified as providing valuable natural and semi-natural open space. This would be lost if the sites were allocated for housing. In terms of sustainability, a negative factor in not bringing the sites forward in the 2018 consultation was the distance to a railways station (in excess of 2kms). By definition that negative factor remains and forms part of the reason why other

potential sites in the area have not been brought forward (such as site LP1089 on Rochdale Road). Open Space There would be complete loss of natural and semi-natural open space Air Pollution The homes proposed in Greetland will significantly add to air pollution. This goes against The Clean Air strategy 2018 adopted by Calderdale Council; yet to build these houses would put our children who attend Greetland School and Sunnybank Pre-School at higher risk of ill health due to further increasing air pollution as their playground is only a couple of feet away from the already very busy congested main road which carries a lot of heavy good vehicles, due to a 24 hours recycling plant, which is only accessible by Saddleworth Road ; the road the development is intended for. Inflated housing target at the cost of great environmental harm Calderdale have based their growth on the WYCA anticipated employment figures (which is between 35,000 to 50,000 new jobs for the LeedsCity Region as a whole The Leeds City region has produced below average employment over the past 30 years but in their Strategic Economic Plan they envisage well above average growthin the next 15 years. This is extremely optimistic given that the current UNEMPLOYMENT rate in Yorkshire is 4.3% which is the second highest of any region in the UK and is currently increasing. If Calderdale's economic growth was more accurate, there would be no need to destroy precious Greenbelt land. The Council have proposed a number of alterations to its Green Belt boundaries to simply meet an inflated housing target at the cost of great environmental harm. The NPPF is clear that Green Belt should only be altered in exceptional circumstances through the preparation or review of a Local Plan. Where it is necessary to consider revision of the Green Belt, this review should be robust in its justification for any alteration ; which is critically missing. The critical importance of early and meaningful engagement and collaboration with communities in producing Local Plans, particularly where this involves altering Green Belt boundaries has not been undertaken as the site has been parachuted into the plan-making process during hearing sessions. This constitutes a seriousbreachof procedural compliance. A local pressure group has been set up at the last moment to attempt to deal with these issues locally and has attracted a significant amount of support. However, the community has not been given the opportunity to produce a Neighbourhood Plan. Neighbourhood Plans can be used by local people to positively shape development in their area, including establishing principles for how former Green Belt sites are developed. Summary All of the reasons why these sites were not brought forward at the Publication Draft stage remain just as relevant now. There has been no further assessment of any of the significant constraints which resulted in the sites being filtered at that stage. The only reason for bringing them forward for allocation now is based on a simple exercise of responding to a requirement to increase the housing supply. There is no justification for allocating these sites given the flood zone allocation and evidence of flooding and given the fundamental conflict with the Green Belt Review in 2017. No consideration has been given to the potential to bring forward other sites in the area that do not carry these fundamental problems. No consideration has been given either to the lack of infrastructure available in Greetland to accommodate such a significant level of new housing. The function of the planning system is to facilitate sustainable development that makes a positive contribution to the environment. It is not the role of the Council torecklesslyrelease demonstrably unacceptable sites within the Green Belt to meet a housing target. The Inspector's letter of 16 July 2019 to the Council notes (Para. 14) that "Local Plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits". This is theundoubtedly thecasehere.No sensible phasing options are proposed related to releaseof the most sensitive Green Belt sitesupontherequirement to demonstrate a five-year housing land supplyeven if the release could be justified. It is illogical to allocate Green Belt sites in Flood Risk Zones 2 and 3 for development before brownfield sites are fully exhausted.The immediate release of the site for development is simply not a sensitive approach to the release ofGreen Belt land even if it were to be appropriate. Later, the Inspector asked the Council to review the option of 'the supply of more suitable and available sites elsewhere'understanding this to be an option, however, the further work on the additional sites considered (incorrectly by the Council) to be 'suitable and available' are not, in fact, suitable and, in any case, it has been revealed that this option on all sites on Saddleworth Road, Greetland (identified below) is simply not sustainable and the proposal is unsound. LP0026 - The Gate Farm, Saddleworth Road, Greetland, Elland, HX48NW LP0177 - Land adjacent Ellistones Place, Saddleworth Road, Greetland, Elland,

HX4 8NW LP0952 - Land at New Gate Farm, Saddleworth Road, Greetland, Elland LP1625 - Land to the west of, Silverdale Terrace, Greetland, Elland, HX4 8NQ

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

Sound Reason:

The site requirements relating to the release of the land from Green Belt is not legally compliant, adequately prepared, fully justified or consistent with National Planning Policy Framework (NPPF) and accompanying Guidance(NPPG). Procedural and Legal Compliance Issues I am concerned that Calderdale council has not adhered to legislation set out in The Climate Change Act 2008 (2050 Target Amendment). I am not able to see any evidence of additional measures to respond to climate impacts of above-trend growth in employment and housing. In addition to this, I am concerned about issues actually acknowledged by the Council itself, particularly regarding traffic impacts and flooding. For issues surrounding the proposed development, regarding traffic and flooding, it would appear that the proposal is not, according to the NPPF, sustainable.When the harm identified is taken into account, the proposals are clearly deemed unsustainable. The land in this site is also unsuitable for development due to issues relating to Green Belt and Heritage Assets, and recent planning case law determined by High Court Judgements relating to the siting of Listed Buildings.Further to this, the proposals are not supported by Housing Infrastructure Fund (HIF) from Homes England, and the inadequacy of existing infrastructure to accommodate this level of growth confirms that the proposals are unsustainable. This has even been publicly recognised by our local MP, Craig Whitaker. Flooding Certainty Part of the site is allocated as Zone 3a and is at the bottom of the chain for development, with development only acceptable if sequential and exceptions tests are passed. There have been no such tests carried out. There is evidence that the site floods both severely and routinely. The way in which this happens actually protects property and infrastructure from harm caused by flooding. Mitigation can not equal or surpass the work currently done by this land as it stands. Black Brook routinely bursts its banks, taking hold of entire expanses of meadow land, posing significant danger to both life and property. There is extensive photographic and video evidence of this. Our community begs you to recognise that there is not a risk of flooding in this area, but a certainty of it. The way in which this site faces routine flooding has been well documented on the reginal news. National news is now starting to contact the pressure group. This is something we have not gone looking for, but instead finds us, due to our level of flood risk, or 'flood certainty' as it is now known within the community. We are a small village in Calderdale Yorkshire, why are we being contacted by national media outlets? The issues we face here are real and they are huge. The entire span of land on LP0177 including South of Greetland Academy School was severely flooded in February 2020 (evidence attached). Greetland Pressure Group has attracted attention from both local and regional press and TV with regards to recent flooding and proposed development. This land routinely floods and would leave any proposed development at risk along with any access roads. Development sites LP0177, LP0026, LP0952, LP1625 are critically important in alleviating any further flooding issues by soaking and storing surface water run off from the large amount of natural springs in the area. The Army was even called into Calderdale, in a bid to help protect people and property from yet another severe flood, also in February 2020. The way in which the Calder Valley routinely experiences flooding can be best understood by Tim Swift's, Calderdale Council Leader, words when he urged the government to grant Calderdale urgent assistance. Swift would like to see Calderdale recognised as a 'Tier 1' authority, which would entitle Calderdale to extra funding support, as 'Calderdale is one of a small number of areas in the country at ''sustained risk'' of flooding.' The head of our council has even recognised the significant threat we face in this area. The topographical context of the proposal in Greetland lends itself to increased flood risks, due to the abundance of natural springs, the water course, and the steep valley sides. All of the factors that contribute towards flooding are against us. Flooding in this part of Greetland is a certainty that grows year on year with the ever-increasing threat of Climate Change. The way in which this valley, with its steep sides, floods is a natural hazard. Residents on Woodfield Drive had to take action to prevent their homes from flooding in February 2020, and not for the

first time either. We have photographic evidence of how this is a routine battle that residents face, and not enough is being done to help prevent this from happening in the future. To build on this land would be to sign residents and the community to an unbearable, unavoidable fate. The NPPF states that, 'due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere.' The topography of our area would not allow for it to be any other way than to increase the risk of flooding to the existing community. The sloping grassland, the trees and the flat flood plains of the land put forward in Greetland in the Local Plan retain an immeasurable amount of water when it really matters. No amount of 'mitigation' can compete with this. To build on this land would have catastrophic and irreversible ramifications, and not just for the immediate area, but for the areas further downstream currently protected by this precious land and the way it currently functions. Prime Minister Boris Johnson has even, on multiple occasions in the press, called for councils to stop allowing building on flood plains. Part of Site LP0177 lies within flood zone 3A ; the highest classification of flood risk in terms of land that could potentially be considered appropriate for development. The zone 3A is immediately adjacent to the western and southern boundaries of Woodfield Drive. The land immediately adjacent to the whole southern boundary of the proposed 3 allocation sites is also allocated as flood zone 3A. The photographs that are attached to this submission show the flooding that has occurred on the land. Given that the land is not only identified as being at risk of flooding but is also evidenced as having flooded, there is no justification in land drainage terms to bring these sites forward for housing. Paragraph 155 of the NPPF clearly states that, -“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk"In putting these sites forward the Council is ignoring the policy requirements of the Framework. The reports compiled by the Council for all four sites on Saddleworth Road when putting together the Publication Draft version of the Local Plan in 2018 concluded that all three should be filtered (i.e. not taken forward as housing allocations) because of ; amongst other things ; flooding and drainage issues. Sequential and exceptions tests would have been necessary to demonstrate that the sites were suitable for and safe to develop. Although the Planning Inspector identified an insufficient supply of housing land following the Stage 1 examination process, it should not simply follow that additional sites are now allocated without a thorough assessment being made as to their suitability to counter the reasons why they were initially filtered. The four sites on Saddleworth Road seem to have been put forward as a simple response to the Inspector's comments with no consideration of the flooding and drainage issues associated with the land. It is clear that there are blurred lines of responsibility and accountability when serious flooding issues arise between Developers, Councils and the Environment Agency. We need accountability when reckless planning leads to catastrophic flooding issues. Green Belt The Green Belt Review carried out in 2017 considered all three of the sites ; reference numbers 065 and 339 in the review. The conclusion of this review was that all of the sites performed strongly in terms of their Green Belt function, meeting at least 3 of the 5 purposes of including land in the Green Belt. Those 3 purposes were: To prevent neighbouring towns from merging into one another; To assist in safeguarding the countryside from encroachment; To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The 0952 allocation was also considered to meet a further purpose in terms of checking the unrestricted sprawl of large built up areas. We would argue that all four of the sites should be considered to serve this purpose, it makes no sense for just 0952 to do so but 0177, 0026 and 1625 not to, given they are all inextricably linked. Development of all sites would result in the unrestricted sprawl of the large built up urban area of Greetland. The four site assessment reports carried out ahead of the consultation on the Local Plan Publication Draft in 2018 concluded that the land represented the -“most sensitive Green Belt"Given this there is no planning policy justification to ignore that impact ; importantly carried out as part of a thorough Green Belt Review of the borough just over 2 years ago ; and now consider the sites suitable for allocation for housing. Such allocation would conflict with key purposes of including land in the Green Belt and would have a fundamental adverse impact on the openness of the Green Belt. Erroneous justification of housing requirement for Green Belt release

Green Belt boundaries should only be altered in 'exceptional' circumstances. This land has been identified as the Most Sensitive Green Belt. The CalderdaleLocal Plan, which has suffered from a democratic deficit throughout its many iterations, sets a targetfor housing based on pre-Brexit demographic evidenceofObjectively Assessed Need (OAN). Thismeansthat the Green Belt asdesignatedin the current UDP has had to be reviewed. The OAN is far too great and as it relates to out-of-date population projections used in Strategic Housing Market Assessment(and update)that have been superseded by lower projections in more recent Office of National Statistics releases that would result in a much lower housing target and the reduce the need to release the number of Green Belt sites. Further, the ambitionsof the Councilfor annualjobs growthover a 16 year period characteristic of a constant 'boom' inflate the requirement well beyond the realistic possibility of actual delivery. It is notresponsibleto allocate land, including a significant amount of Green Belt release,tomeet inflated housing targets based on out-of-date household projections and ambitious and continual jobs growth. The housing target needs revisiting to model scenarios reflective of evidenced-based jobs growth (rather than ambitions), up-to-date household projections (including post-Brexit population projections) and the priority to contribute to sustainable development that does not harm the environment (including the Council's Climate Emergency commitments). The Calderdale LocalPlan has been overtaken by events both demographically, economically and environmentally. At this point, the Council is proposing to adopt a Local Plan that runs entirely against the corporate ambitions of theauthority. It is simply the case that no plan at all (and reliance on the NPPF & NNPG to direct new developments, which wouldincludethe protection of sensitive Green Belt) would be better than theproposedLocal Planthat isunder examination. Disproportionate The most recent revisions to theLocal Planin response to the Inspector's letter includethe addition ofmore Green Beltsites(including LP0026, LP0177, LP0952, LP1625)for release, whichrepresents further unsustainable developmentasa disproportionate amount ofthenew homes proposedareacrossjustfour sitesinGreetland. Indeed, 1,041 additional units of the 1,708 on these new housing sites (over 60%)areproposed in the Elland area alone. There has been substantial development of land in bothGreetlandand Elland in recent years. This cumulativedevelopmentmeans that the landon Saddleworth Roadis the only remaining parcel of the original Green Belt still in agricultural use. Development of the site would erode the visitor's understanding of the extent of the original manorial lands thatGreetlandcovers. Unsustainable Development The Council's Sustainability Appraisal process to support the release of thesiteis inadequate. The site report states that the assessment of SA7 is 'Negative' and marked 'RED' commenting that ''Overall the impact is negative as the site isgreenfieldand lies within flood zones 2 and 3''. The site should be excluded on this conclusion alone, particularly within the wider context of the Council's recent declaration of a Climate Emergencyand recent flood events. Further, the report does not grapple with the issue in the overall conclusions inadequately noting that "with regards to SA7 and flood risk, the impact is negative as the site is greenfield and lies within flood zones 2 and 3" with no specific mitigation measures identified. This does not come anywhere close to an adequate assessment to justify release for development. The Sustainability Appraisal for the Local Plan has notbeenmapped or measured.The benefits of, or the opportunities for, the provision of ecosystem services by the Green Belt land directly around the urban environmentare unrecorded. Section 39 of the Planning and Compulsory Purchase Act 2004 states that a local authority exercising their plan-making functions must do so with the objective of contributing to the achievement of sustainable development. Action 5 of the EU Biodiversity Strategy to 2020 requires member states to map and assess ecosystems, whilst the Minister of State for the Environmentreiteratesthe necessity to map and value the natural capital that make up ecosystem services, specifically in urban environments, in order to improve sustainable planning. Further, the NPPF sets out a presumption in favour of sustainable development and advises that the planning system should contribute to and enhance the naturaland local environment by a number of measures that include 'recognising the wider benefits of local ecosystems. Wildlife Paragraph 175 of the NPPF states that, 'When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts)"¦' which the community is immediately able to jump in with

stating that this cannot be said to be the case in the Calderdale Local Plan, as land was removed from Stainland, which is far less sensitive, in terms of the risk development would pose to wildlife, biodiversity, habitat and landscape. In this way the land in Greetland put into the Local Plan is not compliant with the NPPF. Developer Influence Profit should not dictate planning policy, at a great cost to the environment. In relation to the rest of Calderdale, house prices in Greetland are very high. The developers have not expressed an interest in the overwhelming amount of brown field land available in Calderdale, because the return on investment is so much higher when development is passed in beautiful Green Belt land, set within a village connected to high house prices. The developer is further enabled to do this because it has a monopoly on the large-scale building development taking place in Greetland. Plans have been drawn up for the different sites within Greetland, the sites have been given different codes, and yet the land is almost entirely unseparated by anything physical; essentially, to this community, the separate plots are one piece of land, irrespective of who owns the land on the land register- the development will be concentrated in one place. Different developers have been assigned to the various codes given to our continuous area of Green Belt, however, when this is examined further, it becomes apparent that the developers largely belong to the same parent company. How can Calderdale Council resist pressure from this monopoly situation? They are already under time constraints to designate land to the Local Plan. This is a toxic situation for Calderdale, and thus renders it impossible for the council to deliver the right homes in the right places. The Local Plan in Calderdale has become entirely about developer profit, and not at all about growing the local economy for local people. Severe Lack of Infrastructure Greetland School is an Academy and therefore it is not obliged to expand. In the Council's individual assessments of the sites which resulted in them all being filtered and not taken forward for housing, the consultation from Highways England advised that the development of the scale envisaged would have a significant adverse traffic impact on the Strategic Road Network. Given this how can the sites now be put forward for allocation for housing when nothing has been done to either challenge those comments or address them? The sites in Greetland have not had traffic assessments carried out. Sites elsewhere in Calderdale have been filtered from the Local Plan due to traffic constraints. Given the existing levels of high congestion at the West Vale traffic lights, why has assessment not been carried out? Why has air pollution not been measured? Is it because the sites in Greetland are too appealing to developers, given the high house prices in the area, and something like a traffic assessment would throw a spanner into the works, as it were? Where is the Traffic Plan in the site reports for these sights? These sites have been allocated without appropriate assessment of local road networks. To say that the cumulative traffic impact is being assessed is not sufficient, especially given the scale of the proposed development. To increase the amount of traffic on Saddleworth Road, when it is already so heavily congested, and with a high volume of HGVs, by any amount of traffic, without a proper assessment is not a sustainable practice in planning terms. Heritage No assessment has been made of heritage impact The site assessment reports carried out in advance of the 2018 Publication Draft identified other areas of policy conflict with all three sites ; in particular heritage, open space and sustainability. It was at that time recommended that none of the sites on Saddleworth Road should be allocated until an assessment had been made of the heritage impact. To our knowledge that has not occurred. The sites were identified as providing valuable natural and semi-natural open space. This would be lost if the sites were allocated for housing. In terms of sustainability, a negative factor in not bringing the sites forward in the 2018 consultation was the distance to a railways station (in excess of 2kms). By definition that negative factor remains and forms part of the reason why other potential sites in the area have not been brought forward (such as site LP1089 on Rochdale Road). Open Space There would be complete loss of natural and semi-natural open space Air Pollution The homes proposed in Greetland will significantly add to air pollution. This goes against The Clean Air strategy 2018 adopted by Calderdale Council; yet to build these houses would put our children who attend Greetland School and Sunnybank Pre-School at higher risk of ill health due to further increasing air pollution as their playground is only a couple of feet away from the already very busy congested main road which carries a lot of heavy good vehicles, due to a 24 hours recycling plant, which is only accessible by Saddleworth Road ; the road the development is intended for. Inflated housing target at the cost of great environmental

harm Calderdale have based their growth on the WYCA anticipated employment figures (which is between 35,000 to 50,000 new jobs for the LeedsCity Region as a whole The Leeds City region has produced below average employment over the past 30 years but in their Strategic Economic Plan they envisage well above average growthin the next 15 years. This is extremely optimistic given that the current UNEMPLOYMENT rate in Yorkshire is 4.3% which is the second highest of any region in the UK and is currently increasing. If Calderdale's economic growth was more accurate, there would be no need to destroy precious Greenbelt land. The Council have proposed a number of alterations to its Green Belt boundaries to simply meet an inflated housing target at the cost of great environmental harm. The NPPF is clear that Green Belt should only be altered in exceptional circumstances through the preparation or review of a Local Plan. Where it is necessary to consider revision of the Green Belt, this review should be robust in its justification for any alteration ; which is critically missing. The critical importance of early and meaningful engagement and collaboration with communities in producing Local Plans, particularly where this involves altering Green Belt boundaries has not been undertaken as the site has been parachuted into the plan-making process during hearing sessions. This constitutes a seriousbreachof procedural compliance. A local pressure group has been set up at the last moment to attempt to deal with these issues locally and has attracted a significant amount of support. However, the community has not been given the opportunity to produce a Neighbourhood Plan. Neighbourhood Plans can be used by local people to positively shape development in their area, including establishing principles for how former Green Belt sites are developed. Summary All of the reasons why these sites were not brought forward at the Publication Draft stage remain just as relevant now. There has been no further assessment of any of the significant constraints which resulted in the sites being filtered at that stage. The only reason for bringing them forward for allocation now is based on a simple exercise of responding to a requirement to increase the housing supply. There is no justification for allocating these sites given the flood zone allocation and evidence of flooding and given the fundamental conflict with the Green Belt Review in 2017. No consideration has been given to the potential to bring forward other sites in the area that do not carry these fundamental problems. No consideration has been given either to the lack of infrastructure available in Greetland to accommodate such a significant level of new housing. The function of the planning system is to facilitate sustainable development that makes a positive contribution to the environment. It is not the role of the Council torecklesslyrelease demonstrably unacceptable sites within the Green Belt to meet a housing target. The Inspector's letter of 16 July 2019 to the Council notes (Para. 14) that "Local Plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits". This is theundoubtedly thecasehere.No sensible phasing options are proposed related to releaseof the most sensitive Green Belt sitesupontherequirement to demonstrate a five-year housing land supplyeven if the release could be justified. It is illogical to allocate Green Belt sites in Flood Risk Zones 2 and 3 for development before brownfield sites are fully exhausted.The immediate release of the site for development is simply not a sensitive approach to the release ofGreen Belt land even if it were to be appropriate. Later, the Inspector asked the Council to review the option of 'the supply of more suitable and available sites elsewhere'understanding this to be an option, however, the further work on the additional sites considered (incorrectly by the Council) to be 'suitable and available' are not, in fact, suitable and, in any case, it has been revealed that this option on all sites on Saddleworth Road, Greetland (identified below) is simply not sustainable and the proposal is unsound. LP0026 - The Gate Farm, Saddleworth Road, Greetland, Elland, HX48NW LP0177 - Land adjacent Ellistones Place, Saddleworth Road, Greetland, Elland, HX4 8NW LP0952 - Land at New Gate Farm, Saddleworth Road, Greetland, Elland LP1625 - Land to the west of, Silverdale Terrace, Greetland, Elland, HX4 8NQ

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

Duty to Co-operate Reason:

Suggested Modifications:

Remove the sites below from the Local Plan; LP0026 - The Gate Farm, Saddleworth Road, Greetland, Elland, HX48NW LP0177 - Land adjacent Ellistones Place, Saddleworth Road, Greetland, Elland, HX4 8NW LP0952 - Land at New Gate Farm, Saddleworth Road, Greetland, Elland LP1625 - Land to the west of, Silverdale Terrace, Greetland, Elland, HX4 8NQ

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610769

Comment ID **HRU1807** Site ref (if applicable):

Person ID: **1245417** Name: **Gordon Bradford** 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/5619056

Comment ID **HRU1813** Site ref (if applicable):

Person ID: **1245730** Name: **Mr Sheila Stewart** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

I strongly oppose your plans for further development in the Greetland and Stainland area in Calderdale. I

am 75 years of age and have lived in this area all of my life and feel like a prisoner in my own home. Our life seems to consist of trying to find the best routes to go to doctors , hospitals and other appointments which we have little control of the arrangements. I was lead to believe that back in the late 1970, s the local planning department decided that there was to be no further housing developments to be built on Saddleworth Rd because of the number of existing entrances. Can I remind you that since then there has been numerous houses built bring more residents to the area. The knock on effect of this is that the infrastructures i e Schools, doctors and roads has not kept pace with this extra demand and you now propose to increase the demands by more developments. I feel that before any further developments in the area your First priority should be the the extra demand on the infrastructure which I feel is already at saturation point.

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 **HRU1828** Site ref (if applicable):

Person ID: **1246054** Name: **Bryan Murphy** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

I was shocked and upset to hear about planning for 600 homes on land that is prone to flooding.you would need to build another school also has the saddleworth road site is full has is preschool along with the site at school Street greetland. Their is already problems with parking at both site's.can you imagine the number of cars coming out of the proposesd site into an already busy road,and if you thought to look at both schools morning and teatime when children are leaving it is Horrendous and dangerous for the children and parents.where are all these extra children going to go to school,how are they going to register with a doctor or dentist, doctors surgery on stainland road has taken on extra patients from Elland in the passed few years.Westvale is already over busy with traffic all day long,it will be grid locked if any more homes are built.our schools in greetland are already pushed to the number of Children in a class.

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 **HRU1839** Site ref (if applicable):

Person ID: **1246143** Name: **Mr & Mrs Brian & Elaine Craven** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

I am concerned about this proposed development. There are several points I wish to raise: 1.There are flooding issues with this land,and if a developer alleviates the problem it will only be moved elsewhere. Most likely further down the valley to West Vale. We have all seen the devastation suffered in the Calder Valley and do not wish that on anyone. 2. Are there provisions in place to cope with the increased population in the area? Local school places are at a premium and additional medical services will be required. There is a limit to how much the current local resources can take. 3.West Vale is already congested with traffic at peak times, adding goodness knows how many more cars to the roads can only result in gridlock. Stainland Road is the only feasible route through West Vale, and at the moment it can take up to 20 minutes to get through West Vale from the Medical Centre. 4. Air pollution is a concern with additional traffic. 5. There are several environmental issues connected with building houses and I doubt that the properties will be built to the most up to date environmentally friendly specifications. Having witnessed the developments in Blackley and Lindley in Kirklees I see nothing but poor workmanship and a cowboy attitude. Again flooding is an issue in Lindley on the development and is now affecting adjacent properties which didn't have the problem before.

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 **HRU1864** Site ref (if applicable):

Person ID: **1246244** Name: **Karen Conway** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

As a Greetland resident I wish to strongly object to the plans to build at Saddleworth Road. These are my concerns around the building of numerous new houses in this area. Lack of infrastructure - a huge amount of traffic already exists in and around Greetland and West Vale. The three schools in this area create issues with traffic and parking, and the traffic lights at West Vale are unsafe/unsuitable for large volumes of traffic. Are there going to be new schools built in this area to cope with the increase in demand for places? Green Belt Land Our green spaces need to be protected, particularly in these times where we have ever increasing concerns about air pollution. We should be making decisions to improve air quality and not make matters worse. Flooding issues are also a major concern. "‹ On a separate note for concern: Saddleworth Road is a road on which I walk frequently, and is not only busy with local traffic but is also a rat run between the M62 and outlying areas. This is a fast road, where vehicles do not stick to the speed limit, which in turn creates it's own issues for residents turning left or right onto the main road. It will be interesting to see how the forecast for growth affects the numerical data for road usage. I will look forward with hope that a proper infrastructure strategy will be implemented.

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 **HRU1878** 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:

I am a resident in Greetland, and should like to raise concerns over the plans to build many new houses. My concerns take 3 main forms There are not the necessary roads to cope with the extra traffic (roads are already congested) nor are there amenities such as schools, parks etc 2. This is green belt and should NOT

ever be built on. The proposed site is frequently flooded. Why can the council not take on board that we are in a period of long term climate change? Actually I would add that there are plenty of brown sites which could and should be developed first, they are in the town where there are better roads already.

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 **HRU1884** Site ref (if applicable):

Person ID: **1246375** Name: **Jack Yarker** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

My comments to the above proposals is that more houses will result in a increase in traffic down Saddleworth Road & Rochdale Road & that the traffic lights in West Vale are not adequate or suitable to take any further traffic through Greetland, this issue must be addressed before any further houses are built. You have only to see the disruption being caused at the moment because of the roadworks that are taken place to appreciate that further increase in traffic down these roads indicate what the future problems will be.

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 **HRU1885** Site ref (if applicable):

Person ID: **1246377** Name: **Peter Keene** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

Regarding the housing proposals in the Greetland area. I have lived in this area for over 25 years now & watched the population & housing grow over this time & think the lack of infrastructure in the area can not cope with anymore traffic as the westvale traffic system is always congested over rush hour periods in bad weather or M62 incidents all makes travelling through the area almost impossible. The NHS in Calderdale is already stretched to the limit, parking at the Calderdale royal is impossible with nowhere near enough parking space now. The local Doctors surgery has been stretched beyond its capability as there are not enough Doctors to cope getting appointment now can take up to two weeks.

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 **HRU1886** Site ref (if applicable):

Person ID: **1246378** Name: **Shirley Brown** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

I am strongly against the local plan for the amount of houses proposed for the Greetland and surrounding areas as the lack of infrastructure in this area is all too clear This plan of 600 more houses would create more traffic, more school children and require more doctors, dentist etc Also with the storms of this month (feb 2020) it has proved the proposed land is a flood plain so to build on this would create even more flood problems

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 **HRU1887** Site ref (if applicable):

Person ID: **1246381** Name: **Patricia Keene** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

The plans for new housing in this area are going to lead to lots of congestion on the local A roads ,but the effect on B roads will be chaotic we already find it very difficult, and how are local facilities going to cope with all the people wanting hospital, doctors, schools and local services etc trying to get appointments waiting times are ridiculous already, also more thought is needed into looking at brown sites etc, and careful plans about housing on possible flood areas

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1888** Site ref (if applicable):

Person ID: **1246383** Name: **Diane Wilson** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

I wish to raise an objection to the proposed building of 600 houses off Saddleworth Road West Vale HX4. The infrastructure will not cope with the number of people it will bring to this area. Schools are at capacity Drs surgeries not taking on new patients Potential to bring an extra 1000 cars to the area. West Vale is already a bottle neck.

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 **HRU1889** Site ref (if applicable):

Person ID: **1246388** Name: **S Robertshaw** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

I would like to strongly object to the plan to build 660+ houses in Greetland. Following the recent floods the land in question was left waterlogged with some run off. This site will no longer be able to retain as much water when 600 plus houses are been planned to be built here. Also I worry that the necessary infrastructure has not been considered within the plan. West vale is a nightmare with traffic, schools not big enough to support the houses, doctors surgery only just coping with patients now. And what about green belt land.....it is what it says GREEN BELT . I would like all these items to be considered seriously as I very strongly oppose the build.

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 **HRU1890** Site ref (if applicable):

Person ID: **1246390** Name: **J Robertshaw** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

I strongly object to the amount of housing that is being proposed for this area in Greetland. The valley itself with steep sides is not physically able to accommodate all the extra road capacity that would be needed for the commute to Halifax, Huddersfield or indeed to the M62. Nor have plans been considered which would mean doubling the capacity for schools, medical surgeries and leisure activities for the older population. This must be stopped .

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 **HRU1891** Site ref (if applicable):

Person ID: **1246391** Name: **Anna Mandebura** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

I have resided in Greetland for 30 years and seen many positive changes take place. It is a lovely place to live yet we are now facing a future where certain councillors believe they can ride roughshod over their constituents' opinions about housing proposals on Saddleworth Road. First of all, what is a genuine reason for destroying green belt land which was always precious? This precious land lies next to a primary school which is full of young children who need to explore and feel free to enjoy their green surroundings. Surely building so many houses on that site can only add to the impact on air quality which has already been compromised? Each one of these proposed family homes, without doubt, will have at least 2 cars parked outside. There is no need to emphasize the fact that these cars will be adding to the already great volume of traffic in the surrounding areas of the school (Sunnybank, Woodfield High Meadows to name a few).

May we suggest that "planning" spend some time outside the school in the morning and at pick up and witness first hand how problematic and sometimes dangerous this part of Greetland can be? Then we suggest a trip down to West Vale to see the great line of cars attempting to get through the lights. It goes without saying adjustment to the lights will be no deterrent to the sheer volume of traffic. Take a trip up Sunnybank to see the long line of cars parked on the narrow roads and the stream of cars travelling up and down the hill between the 2 schools. We have been notified about the possibility of increasing the number of bus stops near the proposed site. Could someone explain how this incentive could make any difference at all? There is a limited bus service in this area ! The most important issue in all this is that of providing schooling for the many children who will be moving into or being born in the area. It is no secret that Sunnybank Annexe and Greetland Academy are filled to capacity now. Where does the Council propose to provide quality education for these children? Of course if there are more bus stops, they can be transported anywhere in Halifax! There is 1 GP surgery serving Greetland on Stainland Road. If you are extremely fortunate you may get an appointment within 3 weeks. Are we then led to believe that another surgery will be provided for the increase in population, requesting an appointment with a doctor? (Have we not seen surgeries closing recently?) Calderdale has been greatly affected by flooding and we have been told that we have to accept that climate change is making a difference to the way we live. We watch TV and listen to the Environment Secretary promising the government is doing all it can to help constituents affected by flooding. It is not rocket science to understand that building on flood plains is not an option. Why play Russian roulette and hope that this part of Greetland will escape being submerged in water when there is already water saturated land there? I sincerely hope that our Councillors will continue to listen to local residents and value our 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 **HRU1896** Site ref (if applicable):

Person ID: **1246414** Name: **Amanda Beaumont** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

I want to raise an objection to the proposed building plans in Greetland and Stainland because it is being built on Green Belt and this is a very precious Historic land. The area is also a natural flooding area and whatever drainage was used it would mean more water flowing into the less adequate drainage further down Saddleworth Road and into West Vale because the flooding,has been worse and the drain systems

are lacking on Saddleworth Road and into West Vale so even if the new houses had the best drainage systems the excess would obviously go down Saddleworth are and into West Vale. This would be a disaster waiting to happen!! Also it is unjust that previous plans for housing that is obviously needed but were Not to include Saddleworth Green Belt Land were accepted on the 21st of June 2018. However the Labour control Council proposed these plans without cross-party consultation and it is not taking into account of other parties and it is therefore not democratic and has not taken into account of the devastation of flooding etc waiting to happen! It is very unjust indeed. Another major objection is to the devastate it would have on the natural wild life that lives there. Over the years I have enjoyed walks around the rural Green Belt area and have regularly seen wild life including foxes, badgers, many species of wild birds to name a few, there is no justification to destroy their natural habitat. Another objection is because the area does not have enough infrastructure to accommodate the extra GPs, schools, and dental practices. Indeed the traffic congestion are terrible at rush hour and school times. Also the air pollution which would increase and as is common knowledge this can affect children's respiratory health!! I do hope these devastating Green Belt plans are stopped and reverted back to the previously agreed housing plans. I thank you in anticipation of preserving our precious , historic Green Belt lan, wild life and natural flooding defence.

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 **HRU1910** Site ref (if applicable):

Person ID: **1246469** Name: **Mick Goodyer** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

I have been a resident of Greetland for forty years and feel i must object to the proposed building of new houses in Greetland. The reasons for my objection are as follows 1) The local roads are already very congested and badly worn. 2) This is Green Belt land and supports many forms of Plants and Wildlife. 3) The local schools, doctors and dentists are already over subscribed. 4) During the winter the ground is often water logged, especially this year. By building on this land the flood plain further down the valley would be inundated causing more flooding. 5) The overall effect on the local environment would be detrimental. I agree that new housing is needed in the area and in someways this is being addressed by reusing the old mills and empty building instead of using Green Belt land but this still doesn't address the problem of the capacity of the local infrastructure which is struggling to cope.

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 **HRU1911** Site ref (if applicable):

Person ID: **1246470** Name: **Philip Lodge** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

I would like to object to the proposed housing development on the greenbelt land off Saddleworth Road Greetland for three reasons. 1- This land is Greenbelt land and should stay that way. 2- With this number of proposed houses it will have a massive increase on already very badly congested traffic in the area, especially at the Rochdale Rd / Saddleworth Rd / Stainland Rd traffic lights. I like many others are held up especially at rush hour times every day and recent increase in popularity of new local bars and restaurants in West Vale also increases traffic in the evenings and weekends. 3- We live at Little Bradley and once again only last weekend the field at the the rear of our estate (on the other side of the Black Brook) badly flooded, right on a area you propose to build some of the new houses! This also worries us as if these houses are built and bankings are raised to prevent flooding on that side it will greatly increase the risk of flooding on our estate which as previously been safe from flood risk. Therefore I feel the plans for this new estate must be rejected.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1916** Site ref (if applicable):

Person ID: **1246471** Name: **Christina Barker** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

I write to you to object the proposed planning permission for a number of new homes to be built in the Greetland area. The area is greenbelt and has significant amount of wildlife which would be disturbed and under threat. There arebats in this area. The land is also utilised by local residents for walking and connecting to nature which supports emotional wellbeing. This is crucial to maintain at a time when mental health services are over stretched and local suicide rates are higher than ever. This land is also at risk of flooding. The nearby river has in the recent past already been polluted by neighbouring factories.I would also like to draw attention to the water springs which are currently running down the roads of the hillside due to obstructions caused by building works which have disrupted the historic well system. These acts of building works and causing such disruption are criminal, particularly when the non greenbelt land in this and other parts of the region are not utilised as a priority.

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 **HRU1919** Site ref (if applicable):

Person ID: **1182340** Name: **Mr Ian Haydock** 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:

With regards to the development of houses on Saddleworth Road - It does not need a genius to visit the area and realise that there are many reasons why this Council is stupid and not competent . 1 - West Vale is a complete bottleneck at peak times and any increase in houses will create further delays to buses and traffic. 2 - The schools cannot cope with any increases of pupils. 3 - Most of the land is at risk to flooding. 4- Have any of the Council who voted for this no brainer - been to West Vale at peak morning and evening grid lock???????????? 5 - The land prices in Greetand will not create Ist time buyers affordable housing.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1953** Site ref (if applicable):

Person ID: **1246484** Name: **William Goodwin** 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:

Below are our objections to all the proposed proposals for ALLGreetland areas :- (1)Existing Overdevelopment :- Greetland was a small rural village development huddled up against a tributary of the river Calder and generally in the Calder valley served by narrow roads and with infrastructure commensurate with its physical limitations and surrounded by hilly farmland in a rightfully designated green belt area.Already in the last three or so decades there has been overdevelopment including Foxcourt Bankfield Grange Goldfields estate Woodfield Court Greaves Fold Clayhouse Lane Ravenstone area and others (2)Total Lack of Infrastructure:- The above overdevelopment has already caused untenable strain on local infrastructure and it is unthinkable that the proposals herein could be sustained (a)Roads The area is already choked to breaking point causing physical danger to pedestrians and particularly schoolchildren and further has already created a danger to health by way of the pollution created in the over used and snarled up roads600 more houses would conservatively mean 1200 more cars the roads could not take that traffic (b)Sewers.Already not sufficient (c)Schools :- The area already cannot service the children currently in the area and it is inconceivable that the proposed increase in housing could be accommodated (d)Doctors Surgery's:- The area is already at breaking point and is inconceivable that any increase in population could be serviced by doctors or surgeries (3)FLOODING History tells us and the events of the past few weeks confirm that Calderdale is on the edge of and in parts on a flood plain.Government has recently steamed that it is GOVERNMENT POLICY NOT to build on flood plains or on areas that provide for the dispersal of water to alleviate flooding from existing buildings.The proposed area herein falls on all fours with that in that it is both on a flood plain and forms fields that provides vital run off to alleviate flooding elsewhere.It would be therefore directly against Government Policy and also complete madness to contemplate any development in the Greetland area set out in the proposals

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1958** Site ref (if applicable):

Person ID: **1246496** Name: **mike good** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

We wish to put forward our objections to the outlined planning proposal for the housing development in Greetland on the following grounds I) Lack of any infra structure. a) Increased pressure due to the volume of people on the already stretched local schools, hospitals, doctors, dentists. b) Existing local road network could not cope with the minimum increase of 600 vehicles (one per house) flowing into West Vale (eg massive congestion over last few weeks due to roadworks). 2)Flood plain around Black Beck. No plan for changes to upland or the effect building would have on funnelling water further into West Vale where flooding has happened many times in recent years and weeks.

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 **HRU1959** Site ref (if applicable):

Person ID: **1246498** Name: **Deborah Hilley** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

Please could you add my name to the list of residents who stand in opposition to the housing proposals in Greetland and Stainland. I strongly oppose any new development on Greenbelt land.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2133** Site ref (if applicable):

Person ID: **1246863** Name: **Ms Theresa Jackson** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

I wish to formally present my objection to the Council on the above. (Housing proposed Greetland) The present infrastructure will not support the development. Flood plains are ever decreasing therefore it is environmentally a mistake to use this land for development.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2154** Site ref (if applicable):

Person ID: **1246869** Name: **Ms Deborah Turner** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

Please register my objection as a resident of Holywell Green in Halifax to the proposed housing plan to develop 500 houses on green belt land in the Saddleworth road area of Greetland. The impact on the area will be highly detrimental as the infrastructure cannotsupport the resulting increased traffic and demand on local services which are already overstretched.

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 **HRU2249** Site ref (if applicable):

Person ID: **1243960** Name: **Mr Andrew Steer** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

SEE ATTACHED FOR FULL REPRESENTATION

Do you consider the plan to be Sound?:

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION

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

Duty to Co-operate Reason:

SEE ATTACHED FOR FULL REPRESENTATION

Suggested Modifications:

Comments:

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

consult.objective.co.uk/file/5635296

Comment ID **HRU2283** Site ref (if applicable):

Person ID: **1246969** Name: **Mrs Alwyn Barron** 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:

Comment ID **HRU2285** Site ref (if applicable):

Person ID: **1246970** Name: **Mr & Mrs Eastwood** 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/5635586

Comment ID **HRU2290** Site ref (if applicable):

Person ID: **954363** Name: **Rt Hon Lord David Shutt** 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/5635637

Comment ID **HRU2301** Site ref (if applicable):

Person ID: **1246986** Name: **Mrs Marklew** 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/5635666

Comment ID **HRU2304** Site ref (if applicable):

Person ID: **11791** Name: **Mr Peter Wardhaugh** 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/5635669

Comment ID **HRU2317** Site ref (if applicable):

Person ID: **1246998** Name: **Mr Roger Horton** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

THIS COMMENT WAS RECEIVED AFTER THE CLOSURE OF THE REPRESENTATION PERIOD. Re: Calderdale Council's local plan - Greetland (Case Ref: CW29651) For various reasons I missed the deadline for submitting comments about the latest proposals. After consulting with my MP's office, I was given this email address as a possible means of passing on, my now rather late, comments about the proposed plans. I do hope that you will take note and add them to the record. **** My comments about the Plan are

centred around the following observations and are based upon 25-years' residency in this locality, with experience of using both public and private transport, and a good knowledge acquired through regular exploration. * * * Although there may be a case for increasing the housing in Halifax (the local consequences of, for example, BREXIT being unknown), I am quite frankly amazed that such a large set of developments has been agreed for the Greetland/WestVale area. Where are the plans to deal with the additional traffic, health services, schooling and other services? I am sure that there are more suitable areas in Calderdale that have existing or readily modifiable infrastructure. We already have a significant new housing development in the centre of West Vale which will certainly add to the traffic problems and put additional pressure on local health services. I am far from convinced that the new residents will want to use public transport, or walk, rather than use private vehicles. Any significant additional housing, as per the plan, will surely overload everything. Although it is always possible to increase local health and schooling services (assuming funds and additional trained people can be found), nothing can be done about the traffic congestion short of building new roads ; but the lack of funds, the geography and existing buildings would prevent that ever happening. Other road -“improvement"schemes, such as the changes at Salterhebble will make no difference to West Vale congestion; they have done virtually nothing to alleviate the existing traffic congestion in and out of Halifax and, in my opinion, even the additional multi-million pound changes planned for that area will make little or no difference in the longer term. The local housing plan will add significantly to the traffic on those roads. The issue, especially for any town-bound road traffic, will continue to be a result of the bottle-neck in available lanes from the top of Salterhebble to the Hospital and beyond. Despite the intention of trying to divert people away from cars and onto local transport services, the bus-lanes merely add to the problem because we then squeeze the remaining traffic into single lanes each way. The road -“improvements"merely serve to move the bottlenecks. And there is no way that the volume of people using private transport can be accommodated on the bus services. The basic infrastructure is not there to support anything but insignificant changes. For brevity, I will refrain from adding comments about the other issues, such as flooding. What we are seeing is a result of the lack of proper long-term infrastructure planning both locally and nationally. It is absurd for the Government to put such housing requirement pressure on already heavily populated areas, and ones that lack suitable infrastructure - or even the possibility of improving infrastructure due to the geography. There is more than enough land in this country of ours to develop new towns without overburdening highly populated areas. Where are the visionaries? * * * * I missed the deadline because: a) I was not aware of the more recent changes and developments, perhaps because I do not use social media platforms, nor read the local newspaper. I had signed up for updates regarding the local plan, but I have not received anything in the post for a very long time. b) Our local councillors seem to have failed to consult or inform many those affected. It is only because my local MP happens to have a keen interest in the plans and he recently wrote to me as one of the people on his mailing list. (I hasten to add that I have no personal or political connection with him). c) I find the Web portal for the local plans overly complex and the format requiring too much time to understand in order for me to make some plain English comments! IMHO. It is in dire need of simplification because it will be putting off a lot of people bothering to try and negotiate the pages to find the relevant information, and then try and understand how to formulate feedback. I gave up trying to use it because I became frustrated with the whole experience after wrestling with it for some time. FYI: I speak as a university graduate with decades of relevant IT experience - including Web page construction.

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 **HRU28** Site ref (if applicable):

Person ID: **1134645** Name: **Mr Anthony Mott** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

N/A -I am not commenting on the degree to which the proposal is legally compliant

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

Sound Reason:

The development in Greetland (the area within the plan I am most familiar with) does not have the infrastructure to support circa 550 additional homes. Roads through West Vale are gridlocked at peak times, schools and medical services are beyond capacity. At the very least, consideration should be given to the amount of construction work already taking place in the local area and any development phased to minimise the impact on residents and the environment. Constructing hundreds of homes whilst developing the A629 and Elland railway station would be ill advised. Housing development in Greetland/Elland should be reviewed and replanned when these large infrastructure projects have been completed and the full impacts of both are therefore fully understood.

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

Duty to Co-operate Reason:

N/A - I am not commenting on this element of the plan

Suggested Modifications:

The DPA requirement overall should be reduced and/or the timing of development in Greetland should be considered alongside the A629 works and development of Elland railway station

Comments:

Additional Evidence Link:

Comment ID **HRU30** Site ref (if applicable):

Person ID: **972696** Name: **Mr Keith Woodhouse** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

I believe the Local Plan covering Elland and in particular our Neighbourhood planning area of Greetland, Norland and West Vale is flawed. Calderdale is required under the government's own guidelines to consider Brownfield locations in preference to other areas. Calderdale has not done this systematically or given demonstrable reasons in every case why this has not been possible. There are brown field areas in West Vale such as Horsefall Mill and other locations in West Vale and Greetland that have not been identified as being suitable for housing. In addition other areas in Halifax such as North Halifax appear to have been excluded from new development based on the view that builders are not interested in building there, (Quote from a senior planning officer) which has no bearing under planning guidance rules. Other areas already owned by the Council have also been excluded in the Tabor and Wainstalls area because they are near to but not actually in designated wildlife habitats. Planning officers seem to have decided that the easiest option is to use extensive areas of Green Belt in our area without giving due regard to key principles of greenbelt use as defined by the local government planning advisory service and the guidance specified in the 2011 Locality Act. The biggest issue facing residents of West Vale, Norland, Greetland and Stainland is problems relating to journey times resulting from congestion in West Vale. The Local Government Planning Advisor Service and other planning guidance indicates that a detailed assessment of traffic and local transport implications needs to be undertaken before any planning locations are identified along with recommendation to support necessary changes to the infrastructure. The Local plan has not taken any account of the catastrophic impact of the proposed housing in Greetland would have on congestion in West Vale and the surrounding areas. Calderdales own evidence base is devoid of any information relating to traffic and transport in the West Vale area or the requirement for improvements. In addition the evidence data used to calculate traffic flows in the Elland, Greetland and West Vale area is flawed, as the proposed housing development identified in the data, supporting the analysis, is for significantly lower numbers of houses than that now proposed in the Local Plan. Calderdale's own evidence maps indicates a high chance of flooding in the valley bottom including the West Vale area. No study has been done to identify the impact of the proposed extensive building along the South Side of Saddleworth Road on the risk of flooding that according to the national planning guidelines needs to be done prior to any allocation for building land in the Local Plan. Calderdale in our opinion have failed to adhere to the National Planning Policy Framework with respect to 'the tests of soundness' in the creation of the draft local plan. The documents evidenced in relation to the Transport Plan, Implementation Plan, Water supplies, Flood risk, Waste Water, Education, Energy, Doctors, Dentists are all out of date and not consistent with the current draft plans proposals for Saddleworth Road Calderdale have failed to consult in open and fair manner that ensures no community are discriminated against by limiting comments on the Draft Plan, to letter, email and on line access. The local plan has not been advertised effectively and many young people who rely on social media are unaware of the plan. Older people who are often not computer literate are unable to comment. The on line system is also very difficult to use even for people who are used to using computers. People who do not use computers are finding it impossible to view the vast array of documents that make up the evidence base and the variety of chapters in the 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:

Comment ID **HRU661** Site ref (if applicable):

Person ID: **1242603** Name: **Mr Anthony Hindle** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

I would like to voice my concerns against the proposed building of a large number of houses in the green belt area off Saddleworth road, Greetland, Halifax. The concerns I have are exacerbated by the large scale flooding in this area where the building of new houses is proposed. It would be very inconsiderate for people to buy homes in an area which, as is currently the case, would be flooded out. I would question whether insurance would be obtainable in this area. Other concerns are that, should the development succeed, the effect of air pollution in the village and surroundings would be catastrophic. This would effect greatly the pupils of the junior school which sits in the middle of the proposed development. It would increase enormously the number of vehicles in an area which at present struggles to cope. The infrastructure is not in place to accommodate many more homes; a 600 waiting list at the local doctor's, a long waiting list at the local schools, and the situation at the West vale junctions is chaotic now without being added to. When the nearby M62 motorway is closed, most of the traffic deviates through Ripponden and Greetland to avoid the volume. Further concErns include the effect upon wildlife and the added dangers to children using the roads and footpaths.

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 **HRU758** Site ref (if applicable):

Person ID: **959830** Name: **Mr Paul Green** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

I feel that I need to AGAIN correspond with you in respect of the revised plans, for the new build houses on green belt land in Greetland. Detailed below, I have therefore raised a number of issues which I feel need to be taken in to consideration when you are making your final decision:- Public Transport . The buses have become more apparent by the lack of them. 1 per hour up Saddleworth Road in each direction, to Halifax. If all these new houses are built, how are the local residents supposed to commute on such a poorly supported timetable? Particularly as we keep being told to get out of our cars and onto public transport!! The roads through West Vale are, at the best of times, appalling. Rush hour is a thing of the past. It now lasts for a good two hours, morning and night. If the now 500 and odd houses are built and each house has just one vehicle, then I can imagine West Vale becoming even more gridlocked and then all the surrounding routes would become rat runs, more than they are already. Traffic now comes off the bypass at Elland and uses all the roads and streets as a shortcut. You should try crossing the road at the junction of Saddleworth Road and Stainland Road at 8.30am in the morning. Even with the assistance of the pedestrian crossing you still take your life in your hands. Car drivers just want to get through the lights as quick as possible because of the mass volume of traffic and they are prepared to run the red lights at any cost to avoid certain delay. How can more traffic improve this situation, given that the roads are also in such a poor state? If all this additional traffic is stood idle for hours on end, what is going to be the damage to the environment and pedestrians? More pollutants, more lung/health problems, more people trying to get doctors' appointments, more clogged NHS services!!! Stainland Road Medical Centre will be the ONLY catchment area surgery for all of these new houses. It is at present nigh on impossible to get an appointment on the same day. Two weeks is not unusual, so how will this improve by adding all the additional families to its register? Schools . I was brought up and educated in Greetland and therefore have first-hand knowledge of the schools. These, I do not believe,could cope with the influx of additional children. Furthermore, the school annexe on Saddleworth Road has very poor parking particularly as the vast amount of parents chose, for whatever reason, to deliver their children by car. This brings the whole area to a standstill, which is both annoying and dangerous, due to bad and thoughtless drivers just abandoning their vehicles. Trying to hail the 343 bus at 8.30am, at the bus stop opposite the school, is downright suicidal. Water and Electrics . There are numerous water main bursts around this area as well as frequent power blips. As there is more demand on the utilities infrastructure, this will no doubt increase. Wildlife, Flora & Fauna . Due to all this building work and excavations, trees will have to be felled, and the wildlife,their habitat and food sources are all going to be destroyed, never to be replenished. Being semi-rural means that we have a wide variety of wildlife and birds, these must and should be a high priority for protection. Through no fault of their own, you are going to make them all homeless!!!! Both Saddleworth and Rochdale Roads are the main arterial routes through Greetland. They are severely congested at the moment so they will only get much worse. These mass housing estates will also be blights on the landscape and for Saddleworth Road in particular will be a huge carbuncle. People live in Greetland, not just for the good schools, but for a way of life. It has beautiful scenery, idyllic views, peace and tranquillity, bird song, and wildlife. Residents here love to walk or cycle through the lovely countryside, or take a stroll by the waters' edge. The sheer volume of new build properties that you are proposing will destroy everything that Greetland has ever stood for. Yes, housing is needed but not on this industrial scale. Any houses built need to made of Yorkshire stone and in keeping with the surrounding area, not cheap, nasty "affordable" housing which blights our landscape. Greetland is a semi-rural village but over recent years is becoming more and more abused. There seems to be this urge to concrete over every inch of its land and your propositions appear to be yet another example of this. You therefore need to refrain from bulldozing these green spaces and instead concentrate on utilising brown field sites as opposed to destroying our beautiful village of Greetland forever. Why not build more high rise flats in Halifax town centre, perhaps on the site of the demolished car park at Bull Green? Fast forward three and a half years since my last objections and all the above STILL apply. There's been NO road maintenance, NO additional doctors surgeries built and NO extra school places for pupils. West Vale is EVEN MORE congested and polluted. Also, instead of increasing the number of hospital beds, plans are afoot to merge services between Calderdale Royal and Huddersfield

HRI, possibly bulldozing HRI in the process!! Furthermore, Brexit has now occurred which may have an impact on how many houses nationally are in fact going to be needed. This country is too overpopulated as it is and continually building more and more houses is NOT the solution and destroying habitats for animals and birds and defacing the countryside in the process, is unacceptable, quite frankly. The human race is too "successful" . Medical advances mean we are living longer and there are no world wars to reduce our population. People therefore need to be educated about contraception and they should be concentrating on reducing their carbon footprint. Thank you for your kind attention and I hope that you will take on board my 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 **HRU780** Site ref (if applicable):

Person ID: **1243340** Name: **Mr David Margison** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

I am writing to voice concerns over the proposed housing developments at Greetland (Saddleworth Rd, Stainland Rd & West Vale). While I understand that new housing is necessary, I fear that local infrastructure will not be able to cope. Our local schools, doctors surgeries and highways, could be overwhelmed. To prevent a fall/collapse in service quality, schools will need new classrooms, extra teachers and facilities. Doctors surgeries will need more doctors and ancillary staff. These measures should be taken into account before any planing application is granted. At peak times of the day the junctions of Rochdale Rd and Saddleworth Rd with Stainland Rd are terrible bottlenecks, indeed traffic often backs up almost to Elland and of course in the opposite direction towards upper Greetland. Any new traffic would have to pass through West Vale, unless of course it chose to use the rat run that has become Norland. I feel there needs to be great thought over what may be done with traffic flow through and around West Vale before any planning consent. I notice that there is an area next to the "Sunnybank Academy" at Saddleworth road, designated for housing, LP0177, you will be aware that this site and adjacent sites along the length of Black Brook have both historically and as recently as this week flooded, building there will take away an important flood plain area, possibly leading to greater flooding of any new housing, Greetland centre and most definitely off Stainland Rd at the rugby ground and garden centre downstream, as has been demonstrated last weekend, this area floods regularly. I would like to point out that the councils decision to allow building at Copley, off Wakefield Rd, was almost a disaster this last weekend, the

flood defenses put in place were shown to be inadequate, had the downpours continued for a second day, I suspect all the new property there would have been inundated, I suspect it still will be, sooner than later. There is a plan to build a retirement complex on the site of the old mill, LP1088. I feel that this is a good use of the land, but it must be remembered that this whilst not adding to local schools burden, it will most certainly impact health facilities and traffic, never the less, I still feel that it is a better development than for example new industrial complex which would add to heavy traffic through the village centre. To clarify, yes we need housing, but it has to be the right sort of housing, a mix of high quality family and starter homes. Infrastructure should be at the heart of any planing approval and close consultation with the local community is essential.

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 **HRU795** Site ref (if applicable):

Person ID: **1243367** Name: **Ms Janet Roberts** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

I am a Greetland resident and am appalled that a planning proposal is being considered for hundreds of house to be be built on greenbelt land in the area. I now list my reason's for objecting against this proposal. The area is a home for lot's of wildlife including deer why should these animals/bird life/rabbits lose their home. The schools in the area would not be able to deal with an influx of lot's of more children they are overcrowded as they are. How would the doctor's surgery manage with so many more people to see? it is difficult as it is to get an appointment unless very urgent you have to wait weeks no fault of the doctors/nurses they can only see so many people in one day. The extra traffic that there would be going through West Vale would be chaotic it is bad enough at the momment at peak times every single road is grid locked. I have lived in the area for forty years and have seen so many new property's built in the area quite near me there was a field and now there are new builds there. The area is just not big enough for more and more houses to be built.

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 **HRU800** Site ref (if applicable):

Person ID: **1243400** Name: **Mr Andrew Sweet** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

I'm emailing you with regards to the Greetland housing development plans. I think it's ridiculous that you are planning on building potentially hundreds of homes in an area where the infrastructure is already inadequate. The A629 corridor upgrades are a welcome improvement to the area, but I think it's most likely too little too late as the UK will have millions of new cars on the road by the time the improvementsare made. West vale traffic lights are grim! I loose days worth of my life every year queueing at the lights trying to get from Elland to Greetland. Hundreds of new homes will mean maybe 1000 additional cars in the area? So at rush hour, the best part of these cars will be descending on an already ridiculous West vale.. Absolutely unacceptable to be constructing new homes in Greetland.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU801** Site ref (if applicable):

Person ID: **1243402** Name: **Ms S Thurlow** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

I am writing to formally lodge my objection to all of the proposed number of developments in the Greetland area (saddleworth Road) As a resident in close proximity of these development plans and also head of a local horse riding group the concerns at the impacts of this development going ahead are colossal. This small village does not have the infrastructure to support its existing population as demonstrated in the huge daily tail backs of traffic, the lack of availability in schools and appointments at doctors (I have regularly had to attend bankfield surgery in elland due to this shortage in resource) the flooding seen in recent days. In addition to this the quality of life for my riding members will be vastly affected, with the majority of local bridleway routes only being obtainable via saddleworth road the addition of the proposed number of houses will not only abolish the means to safely access these bridleways during construction but also affect the ability to ride safely through these areas once they are built. Horse riders tend not to ride through built up areas for this very reason. A number of local equine businesses will suffer from this as people will not be able to utilise the bridleways safely. Furthermore the impact on local wildlife & the eco sytem is incomprehensible. There are so so many reasons why these proposals are not suitable for this particular area and I urge you to consider all objections in their entirety before proceeding to the next stage of events in this saga.

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 **HRU871** Site ref (if applicable):

Person ID: **1243586** Name: **Joan Hesselden** 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:

1. Ecology - impact on wildlife, including deer, foxes, newts.

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

3. Air quality

4. Increased risk of flooding, particularly run off into Black Brook, and impacts felt downstream.

5. Proposals conflict with the climate emergency.

6. Local road network, specifically congestion and capacity

7. Increased crime.

8. Loss of Green Belt land.

9. Ineffective public consultation, and complexity of the information released.

Council's Response:

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

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

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

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

5. The Addressing Climate Change chapter of the Local Plan, along with the sustainability section of Policy BT1 (Built Environment) sets out a clear and positive strategy for combatting climate change. The relevant policies ensure the different policy areas of the Local Plan respond to the challenges of climate change in order to deliver a sustainable future for the Borough.

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

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

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

9. Extensive and inclusive consultation has been carried out throughout all stages of the Local Plan preparation process in accordance with the Council's adopted Statement of Community Involvement and is detailed in the Consultation Statement (Regulation 22).

Test of Soundness

Main Issues:

1. Greetland does not have the infrastructure to support an additional 500 units.

2. Development should be phased to minimise disruption on residents and the environment, and once large infrastructure projects have completed.

3. Ecology - impact on ecology

4. Local road network, specifically congestion and capacity at the West Vale junction. Road safety.

5. Increased risk of flooding.

6. Increase in air and noise pollution.

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

8. Loss of rights of way (through sites along Saddleworth Road).

9. Loss of Green Belt

10. Settlement analysis and distribution of development not justified.

11. LP0026 and LP0952 will constitute unacceptable harm to the landscape.

Council's Response:

1. The Infrastructure Delivery Plan is a compendium of projected infrastructure provision and it helps to ensure that this infrastructure is provided in a timely manner and in a coordinated and sustainable way. It sets out the infrastructure that will support the level of development that is proposed in the Calderdale Local Plan including detail on education provision.

2. Phasing of major developments will be planned in line with the provision of enabling infrastructure.

3. Policies within the Green Infrastructure and Natural Environment chapter of the Local Plan, specifically Policy GN3, set out a clear and positive strategy to ensure the Council effectively manages its natural environment. The Site Assessment Report and Appendix 1 set out the mitigation and enhancement measures suggested by the Council's Conservation (Ecology) section.

4. The Council considers that the evidence submitted supports and justifies the content of the Local Plan. The Council has commissioned transport modelling that is robust and fit for purpose. In addition, the Transport Assessment in any planning application would need to assess impact on local road network.

The 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.

5. The NPPF makes it clear that 'inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere'. Supported by the Calder Catchment Strategic Flood Risk Assessment 2016 (SFRA), the Local Plan is focused upon managing flood risk from all sources and applying a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change.

6. 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. Noise pollution has been highlighted as an issue on some of the sites within the Elland Local Plan Area. Noise Impact Assessments will be required.

7. The Infrastructure Delivery Plan is a compendium of projected infrastructure provision and it helps to ensure that this infrastructure is provided in a timely manner and in a coordinated and sustainable way. It sets out the infrastructure that will support the level of development that is proposed in the Calderdale Local Plan. The IDP is a living document, updated on at least a yearly basis and contains chapters on healthcare, education provision, utilities and public transport.

8. Rights of Way have been identified as constraints. Schemes will be expected to incorporate this in their layout, or if ultimately necessary, arrange for a suitable diversion.

9. 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.

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. 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.

Duty to Co-operate

Main Issues:

Council's Response:

Suggested Modifications

1. The timing of the development of sites should be considered alongside the infrastructure projects in Elland.

2. Remove the sites along Saddleworth Road from the Plan.

3. Detailed plans on traffic flows

4. Increase infrastructure provision, including healthcare, open space, leisure facilities, education.

5. Review the site allocations in line with comments at section 5, and delete these proposed additional allocations.

Council's Response:

1. Agreed. Phasing of major developments will be planned in line with the provision of enabling infrastructure.

2. No change required - The allocation of these sites is considered to be consistent with the Council's site allocation methodology and positioning in the trajectory as set out in the Housing Technical Paper. Document EV 51.1 Site Allocations Assessment Methodology - Publication Draft (2018) details the process the Council has followed in relation to the site assessment process. The document outlines the various stages of assessment from initial site identification to the implementation of the Sequential Approach.

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

4. Agreed. 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.

5. No change required - The allocation of sites is considered to be consistent with the Council's site

allocation methodology and positioning in the trajectory as set out in the Housing Technical Paper. Document EV 51.1 Site Allocations Assessment Methodology - Publication Draft (2018) details the process the Council has followed in relation to the site assessment process. The document outlines the various stages of assessment from initial site identification to the implementation of the Sequential Approach.

Document Section: Site number LP0026 The Gate Farm, Saddleworth Road, Greetlan

Representations

Comment ID **HRU1009** Site ref (if applicable): **LP0026**

Person ID: **1243830** Name: **Mr Howard Wood** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

It does not comply with the NPPF

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

Sound Reason:

It does not comply with the NPPF

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

Duty to Co-operate Reason:

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

Suggested Modifications:

Remove these 'most sensitive Green Belt parcels' entirely from the plan

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5609664

Comment ID **HRU1020** Site ref (if applicable): **LP0026**

Person ID: **955878** Name: **Mrs Susan Smallburn** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

Planning to build on this site does not meet overarching strategic plans favouring building on brownfield sites It also does not fit with national strategic planning guidance discouraging building on flood and run-off areas The consultation process on changing the local plan has been inappropriate, ineffective and basically non-existent.

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

Sound Reason:

The plan is not sound on a number of points Flooding/run-off. This field is a run-off field which is wet for at least 60% of the year. There is already flooding in this field, lower in the valley and adjacent to this field. Development of it would only complicate this further; The field creates a border to prevent the sprawl of Greetland and merger of local villages; The local community facilities are struggling to support current populations. Add further housing and schools, doctors, dentists and other amenities will fail; The addition of houses in this quantity will add significantly to traffic in the local area - increasing congestion locally (which is already significant) and therefore having damaging effects in terms of air pollution (which will directly affect children as the school is low in the valley); This particular site will struggle with access - it is served by a single track road (also a bus route) which already blocks easily; The field is home to various wildlife (foxes, owls, frogs, deer) and is used regularly by walkers. Why destroy these habitats when there are brownfield sites available?

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

Duty to Co-operate Reason:

There was consultation about the original local plan - I attended some meetings myself - and the plan was adopted. This amendment to the plan was made with no consultation, behind the backs of very active local councillors and communities.

Suggested Modifications:

Remove this field from the local plan. Use brownfield sites.

Comments:

Additional Evidence Link:

Comment ID **HRU1036** Site ref (if applicable): **LP0026**

Person ID: **1243857** Name: **mr ralph brook** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Pease see attached file

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5609687

Comment ID **HRU1037** Site ref (if applicable): **10**

Person ID: **1243805** Name: **Mrs Ashworth Ashworth** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

The Stainland Road valley area is prone to flooding. The woodlands should be preserved so that the wildlife is safe and it is green belt land which should be protected. The proposed building of hundreds of houses would cause serious problems as it would potentially add 1000+ cars to the area and West Vale is already a nightmare for traffic. Problems would also arise in terms of medical treatment as local doctors are already struggling with the number of patients they have and the hospitals are already finding it difficult to treat patients as quickly as they used to. Also, there would be a problem with schooling as there are not enough places as it is. Building on green belt land is a recipe for disaster as when we have the dreadful weather we are experiencing at present there is nowhere for the water to drain away. How can you pass a plan without taking all these things into account.

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

Duty to Co-operate Reason:

Suggested Modifications:

The plan should be scrapped.

Comments:

Additional Evidence Link:

Comment ID **HRU1045** Site ref (if applicable): **LP0026**

Person ID: **1243596** Name: **Mr Stephen Smallburn** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

The site is prone to a great deal of surface water that runs down to the bottom of the site and onto Saddleworth Road. Any devlopment on the proposed site would alter the water course and flood plain resulting in further flooding and increased surface water onto Saddleworth Road. This site is above the road and therefore water run off from the upper fields automatically finds its way down to the road. Access to the proposed site would either be onto a very busy road or onto Scarrbottom Lane which extremely narrow and very difficult for two vehicles to pass each other at certain points. Saddleworth Road is used as an alternative route into both Huddersfield anf Halifax when there are problemson the M62 and the current volume of traffic makes it unsafe at certain times. The local amenities Doctors and schools are stretched at the present time and further development will mean it will be impossible for them to cope with the increase in population. Public transport is at a minimum. There is a a healthy spread of wildlife on the proposed site which includes deer, foxes, herons and frogs from the mill dam which is close by. A public footpath runs through the proposed site and is used by the local community. the increase in vehicles would have a massive increase in the air pollution and directly affect the residents down the valley. Any development on this site would conribute to the urban sprawl that has worked its way up from West Vale and will ultimatey result in the villages of Greetland and Barkisland losing their identity.

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

Duty to Co-operate Reason:

The amendments to the Local Plan submitted in 2018 were 'pushed' through by the council without further consultation based on the local plan and economic development plan not matching up. Any plan to build on greenfield sites based on an economic development plan that is crystal ball gazing will create a situation that would be impossible to reverse.

Suggested Modifications:

Revist the Economic Development Plan prior to agreeing the Local Plan.

Comments:

Additional Evidence Link:

Comment ID **HRU1046** Site ref (if applicable): **LP0026**

Person ID: **1243860** Name: **Mrs Laura Rogers** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

Greetland residents received no notification of these planning proposals with many residents finding out via Facebook. The Local Plan does not address the implications of the National Planning Policy Framework, in particular NPPF Para 177 and the associated PPG in the Sustainability of Greenbelt Sites. According to the NPPF Para 143 under 'Proposals affecting the Green Belt' it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.'

The very special circumstances are non existent in this site. This development would contribute to future flooding in the area. The plans have in do not take into consideration the impact on the infrastructure, environment and community, which will all be negative. Greetland Councillor Marilyn Greenwood stated that she was not even told about the Planning Meeting when this plot was added.

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

Sound Reason:

LOSS OF GREEN BELT The impact on the landscape will be detrimental. Greetland has many brown field sights which should be built on first. There are a limited number of green belt sites in the village, so they should be protected at all cost. The land is used by residents, children and walking groups to enjoy local nature which has positive benefits on health and wellbeing, within walking distance for the community to enjoy. WILDLIFE The local wildlife will be devastated by this development including birds such as Herons, Kestrels, Kingfishers, Owls and also Bats which are seen regularly in the area, along with Foxes, Deer FLOOD PLAIN The land proposed for development is on a flood plain with natural springs flowing down the Greetland hillside with the land, hedges and trees acting as sponges with the land boggy after rain. This was demonstrated in February 2020 after the storms. Building on this land would add to the existing flooding problems throughout Calderdale. TRAFFIC CONGESTION This development has only one road in and out which is already congested, and the new residents would need to use their cars as there are no regular busses and local schools are oversubscribed meaning parents would have to use their cars to take children to schools out of the area. It is already extremely timely to pass through the traffic lights at West Vale and the development will only add to the congestion both in West Vale and Ripponden. AIR POLLUTION There is already congestion on Saddleworth Road with cars sat in stationary traffic with engines running throughout peaks times. This new development has the potential to put an additional 1200 cars on the road all adding to the air pollution which will be breathed in by the children playing in the school yards next to the roads. INFRASTRUCTURE Greetland is a village not a town and the current infrastructure is simply not geared up to cope with 600+ houses in the area. Schools are full with no space to expand their buildings and facilities further. Doctors are full to capacity and Dentists already have long waiting lists. The traffic issues have been citied above.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1050** Site ref (if applicable): **LP0026**

Person ID: **954528** Name: **Miss Amanda Smith** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

The application declares the land to be green field when it is in fact classified as green belt, evidenced by referring to the councils own map of the area. As green belt land should not be developed except in exceptional circumstances, none of which apply in this case, the application is not legally compliant.

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

Sound Reason:

This plan is not positively prepared as there does not appear to be any cooperation or advice sought from the relevant agencies who would be affected by the development. The plan is not justified as building on green belt land should only be undertaken in exceptional circumstances, none of which apply in this case. The plan is not effective as there is no plan to provide improvements to the infrastructure of the area or deal with the environmental impact that this development would create. The plan is not consistent with the national policy to refrain from developing green belt areas.

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

Duty to Co-operate Reason:

Duty to cooperate requires the developers to have consulted with other agencies that would be impacted by this development to obtain their views and advice on the development. There does not appear to be cooperation with any of the following: Local transport network agencies CCG or other healthcare providers Education providers Environmental agencies Natural habitat agencies Without advice and support from these local agencies there is no way that this development can be given planning permission as the impact on the local area cannot be safely determined.

Suggested Modifications:

As green belt land should not be developed there are no modifications that would make this development legally compliant or sound. The noncompliance with the Duty to Co-operate in itself illustrates how ill-thought out this proposal is, with no proper consideration of the impact on the local area.

Comments:

Additional Evidence Link:

Comment ID **HRU1061** Site ref (if applicable): **LP0026**

Person ID: **1243827** Name: **Mrs Paula Chantler-Dobson** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

Please refer to Calderdale's Statement of Community Involvement, which has not been followed in this process. CMBC have already stated "These sites lies within the approved Green Belt. The proposed development does not meet the exceptions, as it does not preserve openness and conflicts with the purpose of including land in the Green Belt. As such, it represents inappropriate development in the Green Belt, which is, by definition, harmful. No very special circumstances have been demonstrated to clearly

outweigh the harm caused by the development. It is therefore considered that the proposal would be contrary to NPPF Chapter 13 (Protecting Green Belt Land)"

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

Sound Reason:

The amount of traffic already on Saddleworth Road is becoming unacceptable especially when there is a problem with the M62 as commuters struggle to find alternative routes. This not only impacts on travel time but the pollution from the resulting congestion is an issue, not just for the residents of Saddleworth Road but also the children at Greetland Academy. At a time when the whole world is looking at the destructive effects of pollution on our children and reading through the Clean Air Strategy 2019 I cannot understand how this is not being taken into consideration. If the plans go ahead, with a proposition of 600 houses being built in such a compacted area, there realistically, will be a minimum of a further 600 cars (if they are all one car households, however most family households have two cars) added to our already congested roads. It will also put a massive strain on our overstretched infrastructure. Having lived on Saddleworth Road for over 16 years, the obvious attraction of buying in the area was of course the fact that the surrounding area was Green Belt and as such, have enjoyed the lifestyle that comes with it. The public right of way through the stretch of Green Belt land provides a much valued recreational place for our community. I use the area every day to walk my two large dogs, away from the increasingly busy roads, meeting many likeminded people also enjoying the area, building a fantastic community spirit which is sadly being lost elsewhere. The NPPF asserts the importance of protecting areas of tranquility which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason. The impact that the proposed buildings will have on our Greetland community is devastating, not only for the health and wellbeing of residents but also the social aspect. The importance of green space to communities should not be overlooked. On the Gov.uk website a study has been published by Natural England which reviews the benefits and outcomes of approaches to green care for mental ill health and states:"¦ A report published today (9 February 2016) shows that taking part in nature-based activities helps people who are suffering from mental ill-health and can contribute to a reduction in levels of anxiety, stress and depression'. This land is regularly used by many, including children and this is so valuable to the development of these young minds, away from screens and digital age technology. Being immersed in green areas and experiencing wildlife first hand can only be beneficial to all. The fact that this area is Green Belt in part due to the wildlife corridor, makes it highly sensitive. The amount of wildlife that inhabits this green belt area is wonderful to see but the proposed building work will be catastrophic to the herons, woodpeckers, owls, duck, rabbits, hedgehogs, bats etc, that are regularly seen. I have also noticed in the last few years, more and more rainwater running down Saddleworth Road and flooding in the fields. Whilst the horrendous weather in the last few weeks has been experienced around the country, it should be noted that the flooding in the fields in Greetland, due to them acting as a natural flood defence, is a regular occurrence and with climate change predictions of worsening weather conditions, this is bound to increase the frequency of flooding. If the proposed building goes ahead, where will all the water go? The fields are soaking up large amounts of water at present, when these are covered in housing and tarmac the run off will be increased to an unsustainable level. It will impact not only Greetland but also communities further afield. There are many reports of buildings that have been erected on flood plains that have exacerbated issues of flooding for surrounding communities and is now such a problem that Boris Johnson PM has called for for councils to stop building on flood plains. There should not be building on high risk flood areas, or in extremely close proximity to high risk flood areas. Calderdale is most definitely a high risk flood area. Adrian Gill from the Environment Agency has said -“unfortunately, the Calder Valley is a unique flood risk. It's a very narrow steep sided valley and it doesn't take much to see flooding throughout the catchment right through many communities. We see rapid onset flooding; low onset flooding as well and quite a high risk to life"(BBC Look North / 12 February 2020). Surely there are other sites more suitable for building on? There is land in Stainland, which is on high ground and consequently has no issues of

flooding, that has been saved from the plan. There is other brownfield land within Calderdale that has not been looked at and given that theamount of building proposed in Greetland is disproportionate to other areas in Halifax in addition to the previous reasons stated, I believe that the proposed plans are therefore not sound.

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

Duty to Co-operate Reason:

10 Elland Additional Housing Sites : I am at a loss to understand how Greetland can be categorised as Elland and find the heading very misleading. I wonder if this was to enable plans to go under the radar, so to speak, of concerned residents of Greetland. The fact that I only found out about the plans to build on the proposed sites and the extent of the development through a Facebook post, I feel, does not comply with the Duty to Co-operate.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1065** Site ref (if applicable): **LP0026**

Person ID: **1243865** Name: **mrs julie walker** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5609692

Comment ID **HRU1066** Site ref (if applicable): **LP0026**

Person ID: **1243868** Name: **Mr A BAIRSTOW** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

Green Belt I am not satisfied that the Council has demonstrated exceptional circumstances to justify the release of land from the Green Belt which would destroy valuable agricultural land. Section 11 in the NPPF outlines what is meant by the efficient use of land. It states that the Local Plan must follow planning policies and make decisions which encourage the efficient use of land by re-using land that has previously been developed (brownfield land). This has not effectively been carried out in the area. We have a number of undeveloped brownfield sites in the area, which have not been properly pursued. Traffic With the associated increase in traffic it would compound the road infrastructure especially around the junction with Saddleworth Road and Stainland Road. There has been no investment in this bottleneck where public transport offers no mitigation since buses are also trapped within the queuing traffic resulting commutes into Halifax in excess of 15 minutes and journeys to Hospitals approaching 60 minutes. The transport infrastructure is unable to support this development with access to the rail network being beyond 2 km. The Highways England have themselves suggested that the development of this site not to commenced until the completion of the Road Investment Strategy and then more enhancement is needed beyond 2030. Air Pollution With the increase in standing traffic from the 1200 cars (based on two cars per household from the proposed 600 houses) will also impact on air pollution around dwellings, schools and nursing homes. Such a disproportionally high increase in air pollution will have unthinkable implications for the children of our community. If the government has set targets to reduce air pollution then it does not make sense to allocate such a vast proportion of the overall planning to one area, along one road, where the pollution in the air will become concentrated and toxic. Economic growth The increased housing allocation within the Local Plan is based on projected economic growth, however as both the Inspector and the Council have acknowledged this calculation on based on assumptions. I would like to quote Councillor Sutherland when he addressed the Cabinet during a meeting on the 14th October 2019; "There were not many opportunities for the Council to make decisions in Planning, and once greenbelt sites were built on, there would be no opportunities to change this which would have a lasting impact on Calderdale. In essence, what were the tangible benefits on these sites and how would these be balanced and tested? - “With no evidence on economic growth, Green belt land is proposed to be developed which is unjustified. In a perverse way, residential dwellings close to industrial buildings will have a negative impact such as Sia Fibral/ Bosch. This is due to employer being unreasonably constrained to invest in the site due to emission legislations. The existing stack would be approximately 50m from the proposed site. The result could see a major employer to the area leaving Calderdale to develop an alternative site which does not support employment growth. Heatlh The development will impact on access to open space which will negatively impact on mental health. Amenities Paragraph 94 of the NPPF stares that ' It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: 28 a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and b) work with schools. The Local Plan in Greetland has not seen any of this work done in relation to the local junior schools. As far as parents and the local community are aware the local school has not been consulted on the Local Plan. Due to the fact that The Greetland Academy and West Vale School are academies, they cannot be pushed to expand, this is in direct opposition to the National Planning Policy Framework, and therefore not compliant. We know that the primary school is already oversubscribed. The scale of proposed development would completely overwhelm an already oversubscribed school. Children already living in Greetland may face a situation where there is no place available to them at their local junior school. There is also a very real increased risk posed to the children of Greetland Academy, should the proposed development go ahead. The local Doctors surgery is full and so do not have the capacity to take

on more people in terms of health car. Therefore the development is not sustainable with the local economy unable to support the increase in population. Flooding Calderdale has experienced how unpredictable the water system is particularly in this area, we are constantly reminded of the topography of our landscape and the surrounding areas, and the impact it already has on our lives. Over thirty million pounds has so far been spent on flood defences in Calderdale, and still we have to have the Army called in to help protect us from flood water. It is not right to build on the land in Greetland put forward in the Local Plan. Flooding cannot be militated against in this area. The land as it stands, is helping to prevent further disaster, and must remain as it is. To even suggest altering the way in which this land functions is an inappropriate and irreversible gamble. It is not fair to gamble with the lives of the community, when the community is so opposed to it. The NPPF states that the Local Plan should take account of climate change over a long period of time, including factors such as flood risks, changes to biodiversity and landscape. The NPPF also states that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. To so dramatically change the function of the landscape of the sites put forward for development in Greetland would completely disregard the risk climate change poses to the community on the form of flooding. The entire proposed site falls within a flood zone, where we have seen the impact of flooding in 2015 and more recently in February 2020. The risk of severe wide area flooding is increasing and therefore remains a high risk. To build on this site would compromise the flood storage area and no surface water drainage network, 10m cordon or green roofs will mitigate the risk of flooding as we have clearly seen up and down the Calder Valley. I would consider it immoral to allow home owners to purchase new homes with the prospect of not being able to obtain sufficient house insurance due to proximately of flood zones. Black Brook is a haven for wildlife and is a UK BAP priority habitat. Any development including access roads will have a negative impact to wildlife including deer and herons even with a proposed 10 m cordon due to noise, traffic light pollution. How can the Council consider developing a green belt land with such a rich wildlife and a high risk of flooding when there are other sites available?

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

Sound Reason:

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1083** Site ref (if applicable): **LP0026**

Person ID: **1241801** Name: **Mr Will Priestley** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

Please see attached pdf document "LP0026 - Main Points of Objection"

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

Sound Reason:

Please see attached pdf document "LP0026 - Main Points of Objection"

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

Duty to Co-operate Reason:

Please see attached pdf document "LP0026 - Main Points of Objection"

Suggested Modifications:

N/A

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5609698

Comment ID **HRU109** Site ref (if applicable): **LP0026**

Person ID: **1241695** Name: **Mr John Fox** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

The plan does not give a thorough enough appraisal of social and environmental factors.

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

Sound Reason:

The plan is not justified as it has not provided realistic mitigations for green belt loss, drainage/flooding issues, wildlife habitat preservation, especially amphibians and birds, and the provision of suitable infastucture, e.g. road capacity, school places.

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

Duty to Co-operate Reason:

Suggested Modifications:

The only sound thing to do is to remove this site from the plan.

Comments:

Additional Evidence Link:

Comment ID **HRU1090** Site ref (if applicable): **LP0026**

Person ID: **1243866** Name: **Mr Douglas Fletcher** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

My understanding of the planning framework is that it states that sites to be removed from greenbelt should only be done so under exceptional circumstances. In my opinion there are no exceptional circumstances.

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

Sound Reason:

The plan for the development of this area is ill-considered. We already have issues with school places and access to doctors and dentists without the planned significant increase in population. The existing road network is congested with delays regularly being experienced in and around West Vale. There is a lack of parking in the village and this will be made worse by the addition of new population looking to shop locally. Should they wish to shop further afield then there will be an increase in the overall volume of traffic on already congested roads not to mention the environmental impact of these additional journeys. The recent disruption in West Vale caused as a result of Gas Works has highlighted how congested the area is and how limited we are in having alternative routes available. The water main running from Stainland to Salterhebble has burst a number of times and needs replacing - this will again cause significant disruption which will only be exacerbated by the additional vehicles associated with this planned development. Until the plan clearly sets out how West Vale will be bypassed or how the congestion will be managed (including the decrease in the air quality linked to the congestion) AND detail where the new residents will be schooled AND where new medical and dental capacity will be created, it should not be approved/ratified. Parking within village must be carefully considered and a plan included for this. The plan does not only impact upon those living in the immediate area but everyone within the valley who makes use of West Vale or tries to travel to Halifax.

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

Duty to Co-operate Reason:

This local plan has been progressed in a stealthy manner ; given the significant increase in housing stock that is planned and the corresponding increase in population, I feel that everyone within 2 or 3 miles of the planned development should have been notified of the plan and provided with details as to how they could be involved in the consultation ; not everyone benefits from being able to find the information that is hidden on the website.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1103** Site ref (if applicable): **LP0026**

Person ID: **1243870** Name: **Mrs Melissa Bairstow** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

Green Belt I am not satisfied that the Council has demonstrated exceptional circumstances to justify the release of land from the Green Belt which would destroy valuable agricultural land. Section 11 in the NPPF outlines what is meant by the efficient use of land. It states that the Local Plan must follow planning policies and make decisions which encourage the efficient use of land by re-using land that has previously been developed (brownfield land). This has not effectively been carried out in the area. We have a number of undeveloped brownfield sites in the area, which have not been properly pursued. Traffic With the associated increase in traffic it would compound the road infrastructure especially around the junction with Saddleworth Road and Stainland Road. There has been no investment in this bottleneck where public transport offers no mitigation since buses are also trapped within the queuing traffic resulting commutes into Halifax in excess of 15 minutes and journeys to Hospitals approaching 60 minutes. The transport infrastructure is unable to support this development with access to the rail network being beyond 2 km. The Highways England have themselves suggested that the development of this site not to commenced until the completion of the Road Investment Strategy and then more enhancement is needed beyond 2030. Air Pollution With the increase in standing traffic from the 1200 cars (based on two cars per household from the proposed 600 houses) will also impact on air pollution around dwellings, schools and nursing homes. Such a disproportionally high increase in air pollution will have unthinkable implications for the children of our community. If the government has set targets to reduce air pollution then it does not make sense to allocate such a vast proportion of the overall planning to one area, along one road, where the pollution in the air will become concentrated and toxic. Economic growth The increased housing allocation within the Local Plan is based on projected economic growth, however as both the Inspector and the Council have acknowledged this calculation on based on assumptions. I would like to quote Councillor Sutherland when he addressed the Cabinet during a meeting on the 14th October 2019; "There were not many opportunities for the Council to make decisions in Planning, and once greenbelt sites were built on, there would be no opportunities to change this which would have a lasting impact on Calderdale. In essence, what were the tangible benefits on these sites and how would these be balanced and tested? - “With no evidence on economic growth, Green belt land is proposed to be developed which is unjustified. In a perverse way, residential dwellings close to industrial buildings will have a negative impact such as Sia Fibral/ Bosch. This is due to employer being unreasonably constrained to invest in the site due to emission legislations. The existing stack would be approximately 50m from the proposed site. The result could see a major employer to the area leaving Calderdale to develop an alternative site which does not support employment growth. Health The development will impact on access to open space which will negatively impact on mental health. Amenities Paragraph 94 of the NPPF stares that ' It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: 28 a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and b) work with schools. The Local Plan in Greetland has not seen any of this work done in relation to the local junior schools. As far as parents and the local community are aware the local school has not been consulted on the Local Plan. Due to the fact that The Greetland Academy and West Vale School are academies, they cannot be pushed to expand, this is in direct opposition to the National Planning Policy Framework, and therefore not compliant. We know that the primary school is already oversubscribed. The scale of

proposed development would completely overwhelm an already oversubscribed school. Children already living in Greetland may face a situation where there is no place available to them at their local junior school. There is also a very real increased risk posed to the children of Greetland Academy, should the proposed development go ahead. The local Doctors surgery is full and so do not have the capacity to take on more people in terms of health car. Therefore the development is not sustainable with the local economy unable to support the increase in population. Flooding Calderdale has experienced how unpredictable the water system is particularly in this area, we are constantly reminded of the topography of our landscape and the surrounding areas, and the impact it already has on our lives. Over thirty million pounds has so far been spent on flood defences in Calderdale, and still we have to have the Army called in to help protect us from flood water. It is not right to build on the land in Greetland put forward in the Local Plan. Flooding cannot be militated against in this area. The land as it stands, is helping to prevent further disaster, and must remain as it is. To even suggest altering the way in which this land functions is an inappropriate and irreversible gamble. It is not fair to gamble with the lives of the community, when the community is so opposed to it. The NPPF states that the Local Plan should take account of climate change over a long period of time, including factors such as flood risks, changes to biodiversity and landscape. The NPPF also states that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. To so dramatically change the function of the landscape of the sites put forward for development in Greetland would completely disregard the risk climate change poses to the community on the form of flooding. The entire proposed site falls within a flood zone,where we have seen the impact of flooding in 2015 and more recently in February 2020. The risk of severe wide area flooding is increasing and therefore remains a high risk. To build on this site would compromise the flood storage area and no surface water drainage network, 10m cordon or green roofs will mitigate the risk of flooding as we have clearly seen up and down the Calder Valley. I would consider it immoral to allow home owners to purchase new homes with the prospect of not being able to obtain sufficient house insurance due to proximately of flood zones. Black Brook is a haven for wildlife and is a UK BAP priority habitat. Any development including access roads will have a negative impact to wildlife including deer and herons even with a proposed 10 m cordon due to noise, traffic light pollution. How can the Council consider developing a green belt land with such a rich wildlife and a high risk of flooding when there are other sites available?

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

Sound Reason:

Green Belt I am not satisfied that the Council has demonstrated exceptional circumstances to justify the release of land from the Green Belt which would destroy valuable agricultural land. Section 11 in the NPPF outlines what is meant by the efficient use of land. It states that the Local Plan must follow planning policies and make decisions which encourage the efficient use of land by re-using land that has previously been developed (brownfield land). This has not effectively been carried out in the area. We have a number of undeveloped brownfield sites in the area, which have not been properly pursued. Traffic With the associated increase in traffic it would compound the road infrastructure especially around the junction with Saddleworth Road and Stainland Road. There has been no investment in this bottleneck where public transport offers no mitigation since buses are also trapped within the queuing traffic resulting commutes into Halifax in excess of 15 minutes and journeys to Hospitals approaching 60 minutes. The transport infrastructure is unable to support this development with access to the rail network being beyond 2 km. The Highways England have themselves suggested that the development of this site not to commenced until the completion of the Road Investment Strategy and then more enhancement is needed beyond 2030. Air Pollution With the increase in standing traffic from the 1200 cars (based on two cars per household from the proposed 600 houses) will also impact on air pollution around dwellings, schools and nursing homes. Such a disproportionally high increase in air pollution will have unthinkable implications for the children of our community. If the government has set targets to reduce air pollution then it does not

make sense to allocate such a vast proportion of the overall planning to one area, along one road, where the pollution in the air will become concentrated and toxic. Economic growth The increased housing allocation within the Local Plan is based on projected economic growth, however as both the Inspector and the Council have acknowledged this calculation on based on assumptions. I would like to quote Councillor Sutherland when he addressed the Cabinet during a meeting on the 14th October 2019; "There were not many opportunities for the Council to make decisions in Planning, and once greenbelt sites were built on, there would be no opportunities to change this which would have a lasting impact on Calderdale. In essence, what were the tangible benefits on these sites and how would these be balanced and tested? - "With no evidence on economic growth, Green belt land is proposed to be developed which is unjustified. In a perverse way, residential dwellings close to industrial buildings will have a negative impact such as Sia Fibral/ Bosch. This is due to employer being unreasonably constrained to invest in the site due to emission legislations. The existing stack would be approximately 50m from the proposed site. The result could see a major employer to the area leaving Calderdale to develop an alternative site which does not support employment growth. The development will impact on access to open space which will negatively impact on mental health. Amenities Paragraph 94 of the NPPF stares that ' It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: 28 a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and b) work with schools. The Local Plan in Greetland has not seen any of this work done in relation to the local junior schools. As far as parents and the local community are aware the local school has not been consulted on the Local Plan. Due to the fact that The Greetland Academy and West Vale School are academies, they cannot be pushed to expand, this is in direct opposition to the National Planning Policy Framework, and therefore not compliant. We know that the primary school is already oversubscribed. The scale of proposed development would completely overwhelm an already oversubscribed school. Children already living in Greetland may face a situation where there is no place available to them at their local junior school. There is also a very real increased risk posed to the children of Greetland Academy, should the proposed development go ahead. The local Doctors surgery is full and so do not have the capacity to take on more people in terms of health car. Therefore the development is not sustainable with the local economy unable to support the increase in population. Flooding Calderdale has experienced how unpredictable the water system is particularly in this area, we are constantly reminded of the topography of our landscape and the surrounding areas, and the impact it already has on our lives. Over thirty million pounds has so far been spent on flood defences in Calderdale, and still we have to have the Army called in to help protect us from flood water. It is not right to build on the land in Greetland put forward in the Local Plan. Flooding cannot be militated against in this area. The land as it stands, is helping to prevent further disaster, and must remain as it is. To even suggest altering the way in which this land functions is an inappropriate and irreversible gamble. It is not fair to gamble with the lives of the community, when the community is so opposed to it. The NPPF states that the Local Plan should take account of climate change over a long period of time, including factors such as flood risks, changes to biodiversity and landscape. The NPPF also states that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. To so dramatically change the function of the landscape of the sites put forward for development in Greetland would completely disregard the risk climate change poses to the community on the form of flooding. The entire proposed site falls within a flood zone,where we have seen the impact of flooding in 2015 and more recently in February 2020. The risk of severe wide area flooding is increasing and therefore remains a high risk. To build on this site would compromise the flood storage area and no surface water drainage network, 10m cordon or green roofs will mitigate the risk of flooding as we have clearly seen up and down the Calder Valley. I would consider it immoral to allow home owners to purchase new homes with the prospect of not being able to obtain sufficient house insurance due to proximately of flood zones. Black Brook is a haven for wildlife and is a UK BAP priority habitat. Any development including access roads will have a negative impact to wildlife including deer and herons even

with a proposed 10 m cordon due to noise, traffic light pollution. How can the Council consider developing a green belt land with such a rich wildlife and a high risk of flooding when there are other sites available?

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1110** Site ref (if applicable): **LP0026**

Person ID: **957626** Name: **Mr Robert Birkby** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

As I understand the situation...the plan does not meet the NPPF guidelines in relation to building on green belt land. There are no 'very special circumstances' for building here. Quite the opposite. - The land type is listed as 'greenfield' on the Calderdale planning website, very misleading and incorrect. Is this legally compliant? The land is even listed as 'green belt' on the Calderdale Council's own interactive map. See my attached screen grab. - Much wildlife lives in the area including deer, owls and particularly bats. I quote from the Bat Conservation Trust 'It is illegal to damage, destroy or disturb any bats or roosts without having taken the necessary precautions.' -The area below this site is a flood zone 3 on the government's national flood website - i.e. the worst case scenario 'land with a high probability of flooding' greater than 1 in 100. See https://flood-map-for-planning.service.gov.uk/ - If development at this site was a serious consideration several months ago, surely it won't be now with the devastation since Storm Ceira this month.

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

Sound Reason:

I realise the Council are under pressure to find housing sites but I'm struggling to think of a worse place for development in Calderdale. Building here is not justified or consistent with national policy. Here are a few reasons:- - The high risk of flooding as many others have mentioned. If the events of the Boxing Day 2015 floods are regarded as a freak event, think again as Greetland has been flooded through much of February 2020. The valley bottom has been flooded, and a large number of houses on Saddleworth Road have had water cascading through the gardens/down the drive. The extra surface water created by these houses, and the extra load on the drainage system (which already cannot cope, nor are maintained properly by the council) would massively contribute to further problems. Water has to go somewhere and we're losing soakaway land. Even if the new developments don't flood, other properties will. Calderdale Council should take the opinion of their own drainage engineers. They will tell you it's already a very problematic area for them. Greetland is full of culverts and underground water courses. - The traffic congestion on Saddleworth

Road is already terrible. Most notably, when people are doing the 'school run' or if there's a problem on the M62, the queue to Halifax can start up around Daleside, 0.8 miles from the West Vale traffic lights! Even on a normal day without M62 incidents the weekday wait time is unacceptable. To add hundreds of houses to this area (each with an average of 1.5 cars I believe?) is unthinkable. No railway station within a reasonable distance so the majority will be driving. See attached photo. - Pollution from the above. - The education and healthcare providers in the area do not have the available capacity to support this number of families moving to the area. - Development is adding to the urban sprawl...the very reason that the land was designated green belt in the first place. - I can think of other areas of Halifax/Calderdale which are much less under strain from flooding and traffic congestion than this.

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

Duty to Co-operate Reason:

Judging by the number of people who have been upset by the previous development plans at Greetland, then no the Council are not co-operating. Members of the public and local councillors are still largely against this. Greetland Pressure Group has been set up with over 1000 members. https://www.itv.com/news/calendar/2020-02-11/campaign-group-protest-against-building-600-homes-on-greetland-floodplain/ - Politicians seem to be working on ranking Calderdale as a Tier 1 flood risk area with DEFRA and MHCLG. With this in mind and the recent floods caused by climate change , Calderdale Council need to be looking towards changing government policy in the area. Clearly finding space for thousands of new properties isn't a viable option, in my opinion anywhere in the Calder Valley, not just Greetland. - This Calderdale portal seems designed to make objection difficult for the public to use with lots of legal jargon and acronyms. How many people know if the development is legally compliant? Who understands the duty to cooperate? - The Duty to cooperate guidelines state the following: 'Prior to submitting a Local Plan in these circumstances local planning authorities should have explored all available options for delivering the planning strategy within their own planning area. They should also have approached other authorities with whom it would be sensible to seek to work to deliver the planning strategy.' As the area in question is a flood plain then the Environment Agency should have been approached to give their opinion on the advisability of building on this land. There is no mention of this in the application. There is no mention of the National Health Services Commissioning board or the local CCG being consulted to check that there is enough health provision resource in the area to cope with these additional families. There is no mention of the local Highways agency being consulted to find out what their view is on the impact on traffic in the local area.

Suggested Modifications:

No modifications can be recommended - it's not a suitable area for development. The area is rich in wildlife and the last thing it needs is more traffic congestion and addition to surface water.

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5609716

Comment ID **HRU1111** Site ref (if applicable): **LP0026**

Person ID: **1243145** Name: **Mrs Chloe Smith** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

I CONSIDER ALL OF THE FOLLOWING OBJECTION POINTS TO BE RELEVANT FOR ALL OF THE PROPOSED DEVELOPMENTS IN THE GREETLAND AREA- LP0026, LPO177, LPO952, LP1625. The following points cover all four sites as they are in such close proximity to each other and the negative implications are the same for each site. The local plan does not comply with the National Planning Policy Framework, at the beginning of the policy the three overarching objectives are mentioned: a) an economic objective ; to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure; b) a social objective ; to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and c) anenvironmentalobjective ;tocontributetoprotectingandenhancingour natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy. These three overarching objectives contain lots of points that the local plan fails to comply with. This greenbelt land is NOT the right type of land in the right place. The provision of the infrastructure will be considerably compromised by the local plan, the area cannot cope with increased volume of traffic on the roads. The local plan does not not support communities health, social and cultural well being, by taking away an area of land that is used for walkers, children to get fresh air this is definitely the opposite. The health of the community will be compromised by the huge traffic pollution increase. It mentions 'open-spaces' in the social objective, the open-spaces in Greetland will be lost if the developments are to go ahead, thus the opposite of this point. The third objective mentions contributing to protecting and enhancing our natural environment. The local plan is on greenbelt land that would destroy the homes of the local wildlife corner, not protecting in any way! For these reasons, along with many more I do not consider the local plan to be sound or legally complacent in any way. I do not consider the plan to be sound and have the following reasons for my objections: -Greenbelt and wildlife -Pollution and traffic congestion - Flooding - Infrastructure Greenbelt and Wildlife To quote the NPPF 136 Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified . I do not believe that the reasons for the local plan are exceptional circumstances and are definitely not justified or evidenced. This land should be protected for the reasons it was made Greenbelt land in the first place. This is a wildlife corner home to many different wildlife species. This is land used by walking groups and children, it is good for health and well being to walk in the open-air and with mental health issues on the rise it is vital that this area of free space is not lost. NPPF 174 174. To protect and enhance biodiversity and geodiversity , plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity56; wildlife corridors and stepping stones that connect them; "‹ By building on greenbelt land the local plan is not protecting or enhancing the wildlife-rich habitats that are contained on this fabulous land. To quote the NPPF 137 137- makes as much use as possible of suitable brownfield sites and underutilised land; Brownfield sites- There are plenty of brownfield sites in Halifax that need to be considered first, I have looked at the Brownfield Register and it is not updated, showing a lack of priority for this. I do not feel that the suitable Brownfield sites have been considered first. There is a demolished mill at the bottom of Saddleworth Road, surely this should be a site for development before Greenbelt land! Pollution and Traffic Congestion 180. Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment . The location at the moment is already horrifically congested. West Vale is a bottle-neck of traffic especially at peak times. The traffic pollution created by the extra proposed number of houses will most likely cause danger to health, especially to the children attending the Pre school and Infant school on

Saddleworth Road. This goes against the governments strategy on air quality. Planning and flood risk 155. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere . The proposed area of development is on an area prone to flooding. The weekend of the 10 th February saw extensive flooding in this area. There is lots of photographic evidence to show that the proposed area for development will already be prone to flooding. Where will all this water go ? The extreme current weather conditions have already proven to have devastating consequences in Calderdale. Calderdale Council have declared a 'Climate Emergency' but then are planning on building houses on flood plains, this will increase flood risks in West Vale and Elland. This is ludicrous. Infrastructure As there is only one main road in and out this is going to cause major congestion issues. The other roads into Greetland are often narrow and already very congested, such as inNorland. The proposed plans on site LP0026 will cause major issues given that already the road is very narrow and two cars have trouble passing each other as it is. If this is to be an access point for an extra 60-70 houses it will definitely cause more issues than it already does. Greetland is currently a village, not a town. There are not enough shops to deal with the amount of proposed houses. I am currently on a waiting list for the local dentist, there is already a waiting list pages long. There is not enough space at the Dentist or Doctors to deal with this vast number of new residents. The local schools are also already full. This does not comply with the NPPF statement following - 94. It is important that a sufficient choice of school places is available to meet the needs of existing and new communities The local pan will therefore have a disastrous effect on the infrastructure of Greetland itself. The local bus service is currently inadequate for the area. I worry that when my son is of high school age he will be unable to get a place on a school bus, are there plans to expand this service ? I do not believe that there is a shortage of houses in this area or an unemployment problem or an issue of homeless families ? Greetland can not possibly cope with the demands and negative impact that these developments will bring on a village. I would like to see the four sites in the Greetland area be removed from the local plan. They do not comply with the National Policy Planning Framework and are not sound.

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

Sound Reason:

I CONSIDER ALL OF THE FOLLOWING OBJECTION POINTS TO BE RELEVANT FOR ALL OF THE PROPOSED DEVELOPMENTS IN THE GREETLAND AREA- LP0026, LPO177, LPO952, LP1625. The following points cover all four sites as they are in such close proximity to each other and the negative implications are the same for each site. The local plan does not comply with the National Planning Policy Framework, at the beginning of the policy the three overarching objectives are mentioned: a) an economic objective ; to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure; b) a social objective ; to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and c) anenvironmentalobjective ;tocontributetoprotectingandenhancingour natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy. These three overarching objectives contain lots of points that the local plan fails to comply with. This greenbelt land is NOT the right type of land in the right place. The provision of the infrastructure will be considerably compromised by the local plan, the area cannot cope with increased volume of traffic on the roads. The local plan does not not support communities health, social and cultural well being, by taking away an area of land that is used for walkers, children to get fresh air this is definitely the opposite. The

health of the community will be compromised by the huge traffic pollution increase. It mentions 'open-spaces' in the social objective, the open-spaces in Greetland will be lost if the developments are to go ahead, thus the opposite of this point. The third objective mentions contributing to protecting and enhancing our natural environment. The local plan is on greenbelt land that would destroy the homes of the local wildlife corner, not protecting in any way! For these reasons, along with many more I do not consider the local plan to be sound or legally complacent in any way. I do not consider the plan to be sound and have the following reasons for my objections: -Greenbelt and wildlife -Pollution and traffic congestion - Flooding - Infrastructure Greenbelt and Wildlife To quote the NPPF 136 Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified . I do not believe that the reasons for the local plan are exceptional circumstances and are definitely not justified or evidenced. This land should be protected for the reasons it was made Greenbelt land in the first place. This is a wildlife corner home to many different wildlife species. This is land used by walking groups and children, it is good for health and well being to walk in the open-air and with mental health issues on the rise it is vital that this area of free space is not lost. NPPF 174 174. 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There is a demolished mill at the bottom of Saddleworth Road, surely this should be a site for development before Greenbelt land! Pollution and Traffic Congestion 180. Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment . The location at the moment is already horrifically congested. West Vale is a bottle-neck of traffic especially at peak times. The traffic pollution created by the extra proposed number of houses will most likely cause danger to health, especially to the children attending the Pre school and Infant school on Saddleworth Road. This goes against the governments strategy on air quality. Planning and flood risk 155. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere . The proposed area of development is on an area prone to flooding. The weekend of the 10 th February saw extensive flooding in this area. There is lots of photographic evidence to show that the proposed area for development will already be prone to flooding. Where will all this water go ? The extreme current weather conditions have already proven to have devastating consequences in Calderdale. Calderdale Council have declared a 'Climate Emergency' but then are planning on building houses on flood plains, this will increase flood risks in West Vale and Elland. This is ludicrous. Infrastructure As there is only one main road in and out this is going to cause major congestion issues. The other roads into Greetland are often narrow and already very congested, such as inNorland. 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I worry that when my son is of high school age he

will be unable to get a place on a school bus, are there plans to expand this service ? I do not believe that there is a shortage of houses in this area or an unemployment problem or an issue of homeless families ? Greetland can not possibly cope with the demands and negative impact that these developments will bring on a village. I would like to see the four sites in the Greetland area be removed from the local plan. They do not comply with the National Policy Planning Framework and are not sound.

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

Duty to Co-operate Reason:

Suggested Modifications:

I would like to see the four sites in the Greetland area be removed from the local plan. They do not comply with the National Policy Planning Framework and are not sound.

Comments:

Additional Evidence Link:

Comment ID **HRU1113** Site ref (if applicable): **LP0026**

Person ID: **1243878** Name: **Mrs Claire Zoledziejewski** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Risk of Floods' s This terminology is used a few times on the proposals. I would suggest this is edited to read 'certainty of floods'. The areas closest to Black Brook on the flood plains have done exactly that for many years, more notably during the 2015 Boxing Day floods that blighted our region and during Strom Ciara on 9th Feb 2020. I have attached pictures for your reference of site number LP0177. The houses on Woodfield Grange stand very close to the flood plain as it is, I can only imagine the catastrophic damage caused to these houses and the families that live in them if the flood plain and surrounding hill side was to be built on. As stated in the NPPF paragraph 155. ' Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.' Building on sites such as LP0592, LP0026 and LP1625 would only worsen this scenario as these areas act as a natural soak away to rain fall and surface water. If these sites were to be built on, surface water would flow directly down on the flood plain, which is already stretched during heavy rainfalls. To give you an idea of the amount of surface water on the aforementioned sites please see attached photos looking out onto the field on LP0592 which were taken on 09/02/20 only 20 minutes apart. The first at 10:44am, the second at 11:05am. Note how the swell of water has increased on the field so rapidly in that time, and how quickly that water would drain away, down the hillside and down to the new proposed housing. From there flow down towards Woodfield Grange and carry on further to the neighbouring towns of Elland and Brighouse. From the NPPF- ' 158. The aim of the sequential test is to

steer new development to areas with the lowest risk of flooding. Development should not be allocated or permitted if there arereasonably available sites appropriate for the proposed development in areas witha lower risk of flooding. The strategic flood risk assessment will provide the basisfor applying this test. The sequential approach should be used in areas known tobe at risk now or in the future from any form of flooding.' - Flood plains are labelled as such for a reason, they are there to contain flood water and any breached rivers and streams. To take this away would be detrimental to the neighbouring communities. The council, and developers have obviously underestimated the severity of the flooding in this area of Greetland. Greenbelt & Wildlife Corridor As a resident of Greetland my entire life I have always been aware of how lucky I am to live in an area full of green fields, farms and moorlands. It is certainly one of the main reasons Greetland is such a sought-after place to own a property and bring up your children. Parts of the sites considered for this development are classed as sensitive Green Belt areas, and if I may quote the Governments own NPPF, paragraph 133- -“The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."Taking these green areas away, not only goes against the government's policy by creating urban sprawl it also takes away the green and semi-rural characteristics of our village, not to mention the adverse effects the developments will have on local wildlife native to the area including herons, crested newts, bats and hedgehogs to name but a few. Below is a paragraph from the NPPF- 134. Green Belt serves five purposes: a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. To build on the sites listed at the top of my objection would go against each and every one of these 5 purposes of Green Belt land. In reference to point 'e' I struggle to find the reasoning behind why available brownfield sites have not been considered for this local plan. I do understand that there is a housing crisis to address, and homes do need to be built but I feel that using Green belt areas- including flood plains- is a very poor judgement from our local Council. Infrastructure Aside from the fact this development is suggested for a known flood plain and green belt area, the volume of dwellings suggested across all four sites is overwhelming and disproportionate for Greetland as a village. 600+ houses on already one of the busiest roads in the area would just cause chaos for commuters, school drop off and collection as well potentially turning Sunnybank Drive into a rat run for frustrated drivers trying to access Rochdale road to avoid queues on Saddleworth road. At peak times this road can be very busy, especially as you get closer to West Vale traffic lights and passing the infant school. Adding (I estimate) 1200 cars to this scenario not only would cause peak time traffic to swell ten-fold but also become detrimental to the health and wellbeing of the children at the Sunnybank Pre School and Greetland Academy who would be subject to the car fumes and not to mention the danger that will be posed by the increase in traffic when crossing the road. Information from the World Health Organisation states; ' One reason why children are particularly vulnerable to the effects of air pollution is that they breathe more rapidly than adults and so absorb more pollutants. They also live closer to the ground, where some pollutants reach peak concentrations ; at a time when their brains and bodies are still developing.' As a mother of young children this subject is a major concern. West Vale is overwhelmed by traffic at all times of day, although the new eateries and drinking establishments have brought more business to the area and West Vale is a hive of activity it does mean most days there is slow moving traffic through both sets of lights. Adding to this volume would make West Vale virtually impassable at peak times. Another concern is services and amenities. The local schools are already at capacity as are the doctor and dental surgeries and would not cope with the demand from extra patients or students.

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

Duty to Co-operate Reason:

Little or no information from the council about the proposals.

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5609717

Comment ID **HRU1118** Site ref (if applicable):

Person ID: **958415** Name: **Miss Wendy Atkinson** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

Calderdale Council describes this land as being at increased risk of surface water flooding. We already see surface flooding on this land and down Saddleworth Road and the land below this plot regularly floods after short periods of heavy rainfall, which already threatens adjacent homes and undoubtedly impacts further downstream in West Vale and Elland Bridge. Elland Bridge partially collapsed in the floods of 2015, costing Â£5 million to rebuild and this closed a vital traffic route for almost 2 years. The ludicrous plans to build on this land absolutely beggars belief on these points alone. The land also provides essential habitat for our wildlife; we regularly see deer, owls and bats in the fields alongside Saddleworth Road. The traffic along Saddleworth Road is already very heavy; we have a large volume of heavy goods vehicles and tractors frequently using this road and congestion is a daily occurrence around the Greetland Academy School. The noise polution from the current levels of traffic along Saddleworth Road is considerable and has already been quoted in your own list of 'constraints' for this plot. This noise and air polution would increase dramatically if these plans go ahead. The young children attending the primary school alongside this road would bear the brunt of this air polution . This land is an integral part of the community at Greetland . To have green spaces within walking distance of our homes must be a priority for Calderdale Council. Using these spaces is essential for mental and physical wellbeing.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1121** Site ref (if applicable): **LP0026**

Person ID: **1243884** Name: **Mr Andrew Zoledziejewski** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

I am writing to object to the proposed plan to build on the following sites: "¢ LP0592 (New gate farm) "¢ LP1625 (Silverdale terrace) "¢ LP0177 (Ellistones place) "¢ LP0026 (Gate farm). GREENBELT. These areas are a natural soak and any removal of the floodplain in any capacity would be catastrophic further into West Vale, Elland and Brighouse if this was to disappear the significant loss of greenbelt is extremely worrying. These plots are in a semi rural location and any loss ot this greenbelt would create urban sprawl and an extreme lack of green spaces for recreation and not to mention habitats for local wildlife. INFRASTRUCTURE. With Greetland already upto what many would say call full capacity anyway, I have no hesitation in saying that I any of the proposed sites are used for housing development this will be a complete failure in planning, location and the necessary need for houses in any capacity. The schools are already full, the local doctor surgeries waiting times can't count cope with the demand for local area present. Traffic is utter chaos in West Vale, which is an area which cannot be avoided to get to any of the areas in the local Ward. Throw another estimated 1200 cars into the mix if the proposed 600 homes do go ahead and is simply will not work, its barely passable at peak times at present. DISPROPORTION OF HOUSING SITES. The sheer scale and disproportion of the number of homes to build on a single stretch of road is shocking. Why has such a large amount earmarked for such a concentrated area and Greenbelt area at that, when the Ward consists of greetland elland stainland and holywell green. We're supposed to be promoting development on Brownfield first yet in calderdale as a whole you're telling me that every single area of Brownfield has been exhausted and this is the only viable solution. I find that very hard to believe. I understand the need for housing development to be built at this time that I urge you to remove these 4 sites. As time goes on even without the housing development going ahead there is a significant increase in cars on a road. More extreme weather conditions which test our floodplains on a more regular basis. I really think you should reconsider as this will only be made worse and a scale I cant even imagine as the scenes of devastation from the floods on a few weeks ago in west vale and elland alone were beyond belief. When these Greenfield areas go they dont come back and a functional Greenbelt at that, which is what these 4 sites mention are. Please find enclosed photos of evidence of the flooding which occurred on the 09/02/20. And the need to preserve these natural soak always and floodplains. THE GOVERNMENT. The Government attaches great importance to greenbelt, the fundamental aim of greenbelt policy is to prevent urban sprawl by keeping land permanently open. Green Belt serves 5 purposes: a) to check the unrestricted sprawl of large built up area. ***this local plan merges greetland into surrounding areas. b) to prevent neighbouring towns merging into one another. c) to assist in safeguarding the countryside from encroachment. ***the local plans 600 proposed homes in semi rural locations which provide habitats for local wildlife. d) to preserve the setting and special character of historic towns. e) assist in urban regeneration, by encouraging the recycling of derelict and other urban land. ***not all brownfield has been exhausted in calderdale, not even close. Brownfield site just half a mile down the road in west vale, and former Hanson brickworks in elland yet they decide to build on a green belt floodplain.

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

Duty to Co-operate Reason:

Little or no information about the proposals.

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5609727

Comment ID **HRU1134** Site ref (if applicable): **LP0026**

Person ID: **956333** Name: **Mr Michael Chantler-Dobson** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

The Calderdale Local Plan for the proposed development within Greetland as listed is not legally compliant. Please refer to the details below relating to Government policy and framework relating to any proposed development on any listed greenbelt land or areas that are identified as flood plains or adding to flooding risk.

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

Sound Reason:

Flooding Chapter 14, paragraph 163 of the NPPF says: -“when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere"Calderdale Council has failed to comply withpolicies onflood risk management. and environmental issues have been ignored by this Council. Under question is the Calderdale Council's Sustainability Appraisal process that supports the release of these development sites within Greetland and the further impact on flooding in these areas plus adding to the increased risk further into the River Calder from Greetland to Elland. Military support has been called into Calderdale on Saturday 15 th February 2020 whilst we brace ourselves for the onslaught of Strom Dennis and following the risk to life and devastation of the floods created by Storm Ciara last weekend. The impact on the Calder Valley and the actual effects ontoall of these development sites and subsequent changes to the landscape from this proposed development will add to further flooding and risk to life. The local and national news is covering the huge flood impact on our local community in Calderdale. Huddersfield Examiner Website Headline Story February 15 th 2020: -“Storm Denis Flood Fears In Calderdale, Prompts Army Response to Protect homes"¦"Yorkshire Post Website February 15 th 2020 - “Armed Forces Arrive In Calderdale to SUPPORT flood response and Strom Dennis preparations"The Belfast Telegraph February 15 th 2020: -“Army to Help -“Exhausted"Flood-Hit Residents in Yorkshire" (all relating to Calderdale) I again refer to the NPPF (paragraph 95) and highlight POLICY surround development proposals that could impact and adversely effect public safety and security and that of our defence: 'Planning policies and decisions should promote public safety and take into account wider security and defence requirements by: a) anticipating and addressing possible malicious threats and natural hazards... This includes appropriate and proportionate steps that can be taken to reduce

vulnerability, increase resilience and ensure public safety and security; and b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.' Clearly these proposed sites that flood regularly would be far more at risk due to the development within Greetland. The proposed development will change the natural ability for the land to direct and dissipate run-off water in, not extreme weather conditions, but in what we are now seeing as 'normal' challenging weather. Community The development will have a negative impact on the community. The entire Greetland area and greenbelt that is part of this proposed development would destroy a well-used piece of countryside that is enjoyed by a large majority of the local community. From the NPPF, it clearly says "¦"To protect and enhance biodiversity and geodiversity, plans should: a) identify, map and safeguard components of local wild-life rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity"¦"Clearly this development is at odds with this directive as it would damage local wildlife altering and negativity impacting biodiversity as well as habitats and the landscape. Alternative land in Stainland has been previously removed from the Calderdale Local Plan. This land in Stainland would have avoided all such negative impacts. Therefore, the Calderdale Local Plan and the local planning authority have failed to adhere to this legislative policy. Infrastructure The entire proposed development in Greetland under the Calderdale Local Plan of approximately 600 homes is simply unsustainable from a physical infrastructure perspective. The local schools are full, the local GP surgery is under massive pressure and the road infrastructure cannot cope with current traffic levels. The pressure on the traffic light controlled junctions within West Vale, with traffic feeding from Saddleworth Road, Stainland Road and Rochdale Road, is unsustainable and the aforementioned road structure is almost not fit for purpose with current traffic levels. When there are any issues on the M62 between junction 22 and 24 (fairly frequently) then these routes become completely gridlocked. An extra estimated 1200 cars just feeding into this from the Greetland sites as proposed with the Calderdale Plan will not only add increased congestion issues but also have a bigger impact on the environment and also increase the risk to pedestrian safety and wellbeing.

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

Duty to Co-operate Reason:

Given that the plan is in breach of the NPPF Policy, then if the "Duty to Co-operate" is a negative action by Calderdale Council, the Planning Department and the Calderdale Local plan, then "No" the plan does not comply. However, I feel this is such an ambiguous question that feels set out to intimidate and confuse local people and try to avoid objections. Might I also add that the lack of knowledge and communication to local residents about this "re-submission" of these lands within Greetland is not acceptable and should form a basis of an independent enquiry. The fact that a local group of residents has created a pressure group on social media, been featured on Regional TV News, been featured in Local Press and has organised protests at the Halifax Town Hall and on the greenbelt in question, shows that feelings are very strong about protecting this land and making sure the environment and infrastructure in Greetland is not negatively impacted by this misplaced development proposal. It should also be noted that the fact these sites in "Greetland" are listed as "Elland" means their visibility when searching for them as "Greetland" causes further confusion and exclusion for some parts of the community. The way in which this has been handled clearly discriminates against parts of our community.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1137** Site ref (if applicable):

Person ID: **1243493** Name: **Mr Andrew Cooley** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

I have submitted these same comments to each of these sites which are all in the same geographic area: - LP0026 - LP0177 - LP0952 - LP1625 In my opinion it would have been better to list all of these sites as one; this would avoid duplicating the same concerns. ** Compliance Building on flood plains and green belt land is not part of government policy, as mentioned in NPPF and PPG. The land to be built on is always sodden, even in summer; if covered with tarmac and concrete then this ground water will be forced downstream causing problems, not only locally, but further afield in West Vale and Elland. The impact on local wildlife will be dramatic; herons, kingfishers and deer are amongst the large variety of wildlife seen in this area. It will affect local residents who will no longer be able to enjoy the tranquil, natural countryside for which this area is locally renowned.

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

Sound Reason:

** Soundness I do not believe the plan is positively prepared since local infrastructure, including local roads, health care and schools will not cope well with the increased population in the local area. Traffic will be especially affected since the majority of new journeys will all be on and around Saddleworth Road. It is likely new residents will commute to work at peak times, which already suffer heavy congestion especially in West Vale. It is likely Scar Bottom Lane and Brian Royd Lane will see an increase in traffic. These roads form a part of a bus route which is a single carriageway. The bus is often caught in this bottleneck and increasing levels of traffic will only make this more likely for all road users. This increase in local traffic will affect air quality, which is especially important because schools are situated next to the main roads; this contravenes the government's policy on air quality. I do not believe the plan is justified since building on green belt and flood plains should only be a plan of last resort, and alternative brown field sites are available in both the local and wider areas. ** Effective There is a disproportionate amount of development outlined for Greetland, especially when it is has been listed as part of Elland. The area to the north of Saddleworth Road has already undergone significant development in recent decades, including Templar's Close, Daleside and Trenance Gardens. To further develop the south side of Saddleworth Road is unjustified and would lead to a disproportionate amount of new housing in the valley. At the last census Greetland had a population of 11,389. Adding 600 new homes could increase this figure by around 15-20%. Increasing the size of a village in a very short time scale is neither practical nor an effective means of providing sustainable development. ** National Policy Building on the flood plains and green belt land contravene government policy.

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

Duty to Co-operate Reason:

I have had no formal communication from the council regarding these plans, nor have I seen any publicly posted notices.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1138** Site ref (if applicable):

Person ID: **1243894** Name: **mr Justin Hirst** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

In my opinion the Council have failed to meet its three core principals of Community Involvement namely, Clarity, Inclusivity and Integrity. If it was not for the support of the local community many people would be unaware that the sites have been put back into the Local Plan and that a further consultation period has been made. Exactly what is expected of the general public is also unclear. Phrases such -“Is this Sound" have very little meaning to general public. The use of acronyms, legal and planning -“jargon"make the plan far from user friendly. The Local Plan Website is extremely challenging to navigate, even for the most computer literate. I do not know how the -“average lay person"can be expected to respond and form a clear and sound argument. The Council are showing very little Integrity, with local Councillors and the community not being kept up to date with what is happening. The council has also failed to involve or listen to the community in compiling the plan. Residents were asked to comment on the removal of this site (LP0026) from the Green Belt in 2017 . The overwhelming response from the community was that the land should not be developed and should remain within the Green Belt. The sites in Greetland got the highest number of comments compared to the rest of Calderdale. Despite this, the Council, after initially removing the site, has now put it back into the Local Plan with little justification or sound reasoning to support its actions. In addition, concern has been expressed by residents, as to why Greetland has been has been classified as part of Elland. Greetland is completely separate from Elland and it is misleading for the two areas to suddenly be -“consolidated"Residents of Greetland, on reviewing the Local Plan would have no reason to -“look under"Elland and would miss the opportunity to put forth their comments. Within the -“Settlement Hierarchy",the villages of Greetland/West Vale are not even listed, but the villages at either end of the Greetland (Holywell Green and Barkisland) are listed as Neighbourhood/Small rural areas. In connection with this, there are also questions as to true increase in the amount of housing stock for the Greetland area. In the Councils calculation for -“Distribution of House Growth"(Table 3 Infrastructure Delivery Plan 2019) it shows Greetland, along with Elland, Holywell Green & Stainland to have a growth of 8.21%. However, if Greetland and West Vale are viewed on their own ; which they should be ; using the latest Polling District Figures, the increase in housing stock is around 20%. This is too much for a village of this size and with such limited infrastructure. The Council also appear to have -“gone against"a number of policies set out in the National Policy Planning Framework such as: When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations . The council have not demonstrated that development of this Green Belt will outweigh the harm. The Council have simply created a vague list of possible ways to -“mitigate" problems, most of which have no concrete or sound basis and in some cases are just totally incorrect. When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. The land proposed for development is used as a natural storage area which controls the amount of water going down to Black Beck and ultimately helps prevent even more flooding down the

valley.

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

Sound Reason:

LOSS OF GREEN BELT The site is currently designated as being in an area of Green Belt and in a recent survey it was seen to perform well in all areas apart from one. This area of Green Belt is also classified as being highly sensitive. In 2018 the Council deemed that this area of land was of such significantly high importance that it should be removed from the local Plan and yet now feels that the land is suitable for development. The council have not demonstrated any sound reason for this reversal, other than more land is required. The council have also failed produce any evidence, to show that all available Brownfield sites have been exhausted. Indeed, when challenged, they seem unable to produce any current information with regards to Brownfield availability. Despite a requirement to maintain a current Brownfield register, Calderdale Council have not updated it since 2018. Removal of this Green Belt land could, set the precedence for removing even more of the land from the Green Belt and for development to take place all along the valley. Any development of this Green Belt area would have a major impact on the landscape and dramatically change the character of the locality forever. If this is Calderdale's approach, why have any land designated as Greenbelt, Sites of Special Scientific Interest at all? The development of this area would also mean a considerable loss of Open Space. The Council have stated in their report that removal of this land would have -“no loss/no impact"on the area. There seems to be no consideration that taking the Saddleworth Road Development as a whole, would mean a loss of nearly 25 hectares of open Green space which would have a detrimental effect on the local community. The area is regularly used by walkers, cyclists, horse riders and families. The area is becoming even more popular due to a number of initiatives by the owners of the industrial plant. The site has a public right of way to the west of it. Whilst the developers have stated that this will be retained, it does not take into account what effect the development would have on the character and tranquillity of this area. Walking through a housing estate is not the same as walking through untouched green belt fields. FLOODING The fields within this site all provide two major flood protection functions, land for the run off from the Moorland at the top of the valley and a flood plain for Black Brook. This is clearly demonstrated when we have heavy rainfall, recent examples being the boxing Day Floods 2015 and the more recent floods after Storm Ciara / Denis in February 2020. If these natural flood defences had not been in place the flooding to West Vale and Elland would have been significantly worse. Despite the developer's confidence, I would also have to question the ability to keep any new properties from being victims of flooding. Given that we have experienced serious flooding for the second time in less than 4 years, greater care needs to be paid to the building on flood plains and natural soak always. ENVIRONMENTAL HEALTH The creation of so many houses is going to have a large impact on the amount of pollution created. The development, across all the proposed sites on Saddleworth Road, has the potential to add over 1,000 cars to the road (@ 600 houses and 2 per household). Currently pollution figures are not collected for Saddleworth Road due to -“its open nature" allowing pollution to disperse. However, this natural -“escape route"will be eroded if this considerable area of land is developed. Currently traffic can be cued nearly half a mile up Saddleworth Road waiting to get through the traffic lights in West Vale. The possibility of an increase in cars will mean more cars on the roads, with more engines idling and pumping out more pollution. This is particularly worrying due to the local infant school being next to the road. In the event of closure of the M62 between the junctions for Rishworth and Huddersfield, Saddleworth Road is one of the designated diversions. Traffic regularly cues back over a mile from the Stainland Road / Saddleworth Road junction in these instances. Monthly Pollution readings for West Vale obtained from 2019 Air Quality Annual Status Report show that these monthly readings regularly exceed the 40 mg/ limit, which has been set by the Council. More traffic will only increase these numbers which will be against their own targets. INFRASTRUCTURE The MP for Calderdale has already expressed his concern regarding the"lack of a robust Infrastructure Plan"and how this will have a negative impact on the plan. The Infrastructure plan has no concrete solutions and

does not address the many problems this development would bring such as lack of school places, both infant/junior and secondary, no NHS dentists and the pressure it will put on the local GP practice. The local school, based on Saddleworth Road is unusual in that it split over two sites which are approximately half a mile apart. The intake is based on the proximity to the school site on Saddleworth Road. With the increase in housing on this Saddleworth Road, it could potentially mean that children living next to the School on Rochdale road could not secure a place. Potentially it could mean parents having to drive their children to schools away from the village thus adding to the congestion and pollution. In addition, other infant / junior schools in the area, West Vale / Holywell Green / Norland / Bowling Green are all either very close to or at capacity in all year groups from Reception to Year 6. Further afield, Elland / Lindley (in neighbouring Kirklees) are all at capacity. The public transport is very limited, buses to Halifax run once every hour, do not operate in an evening and have limited service at a weekend. The buses frequently miss and consequently you are unable to rely on them as a means of commuting to work. The main concern though is how the increase in traffic will impact on the area and the lack of any foresight as to what impact this have. The Site Report states that -“Mitigation measures are likely to be required at the Stainland and Saddleworth Road Junction"; however it does not detail what the -“mitigation"will be. The Stainland Road / Saddleworth Road junction is very close to a second junction (less than 200 mtrs) for Rochdale Road / Stainland Road ; the existing problems at rush hour (morning and night) have been ongoing for many years and have been getting worse over the last 5 years. This is despite repeated -“mitigation measures" attempted by Calderdale council. These do not work. In fact a decision to allow the building of a Co-Operative store (with car park) which has an entrance on the junction, causes significant problems / near miss accidents. All major services run through the junction road surface (Gas / Water / electric). At times of major engineering work, the whole Stainland Road / Saddleworth Road junction is placed under 4 or now 5 way traffic control. It takes 30 minutes to travel less than 500 mtrs. Whilst the Infrastructure plan gives details of local road -“improvements"which are due in this area, they are not of a scale which help alleviate the congestion at this junction. It is also worthwhile noting that the M62 has just undergone extensive works to make it a -“smart motorway"which should help reduce congestion. However further schemes to convert areas to -“smart motorways"is now on hold pending Government review into its safety. Using the Sustainability Appraisal Report it can be seen that this site has 10 uncertain impacts, 1 negative and 5 positives. When read in detail I would question the validity of some of these -“positive" impacts and suggest they are more suited to uncertain or even negative. Given the amount of uncertain and negative points raised, I would question the validity of recommending this site as a suitable and sustainable area for development. Whilst we have been told that each site must have a separate and different submission it has been nearly impossible to do this as each area of land is next to each other. Indeed, to consider each site in isolation is not taking into account the full impact of developing over 24 hectares with nearly 600 houses, will have on our local community and the environment.

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

Duty to Co-operate Reason:

not publisized this process. people without access to the internet are excluded.

Suggested Modifications:

remove from local plan, develope ALL brownfiel sites, place development within some Labour Council wards.

Comments:

Additional Evidence Link:

Comment ID **HRU1149** Site ref (if applicable): **LP0026**

Person ID: **317291** Name: **Ms Rachel Taylor** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

There has not been consultation, the sites in Greetland on greenbelt, have been added only in October 2019 with no public or local councillor consultation. This stinks of trying to sneak this in through the back door by the Labour majority led cabinet team of Calderdale. This MUST go back and be properly consulted on with the locally elected councillors of the area.

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

Sound Reason:

GREEN BELT ; there are no exceptional circumstances shown as to why NPPF should not be followed i.e. "NPPF para 135 : The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances , for example when planning for larger scale development such as new settlements or major urban extensions. Any proposals for new Green Belts should be set out in strategic policies, which should: (a) demonstrate why normal planning and development management policies would not be adequate; (b) set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary; (c) show what the consequences of the proposal would be for sustainable development; (d) demonstrate the necessity for the Green Belt and its consistency with strategic policies for adjoining areas; and (e) show how the Green Belt would meet the other objectives of the Framework. The above has not be demonstrated or shown. This building is also within a wildlife corridor. What brown field sites have been considered instead or is this being driven by developers' profits? FLOOD PLAIN ; the area proposed has been shown just very recently that it is on a natural flood plain and natural springs flowing down the Greetland hillside culminate at the proposed site. There is photographic evidence that local houses are subject to flooding already, so any further building would have a catastrophic effect on flooding in the area and beyond to West Vale and Elland. As CMBC has declared a Climate Emergency with the likelihood of flooding events increased, to build here would be foolish in the extreme. POLLUTION / AIR QUALITY ; The pollution caused from a 20% increase in the number of houses in Upper Greetlandwill affect the health of local residents and the health of the Junior School children. INFRASTRUCTURE - the infrastructure is simply not geared up to cope with 600+ houses in that area, this would constitute a small 'village' in it's own right! Traffic is already chaotic in West Vale, how could the area cope with another 1200 cars in the area? This is in addition to a further potential development ; LP1407, which should be taken into consideration prior to any decisions on LP0026, LP0177, LP0952 and LP1625.

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

Duty to Co-operate Reason:

These houses have been quietly added to the LP by a small number of non local councillors in October 19 with no prior or local consultation. Therefore I consider that the council have not co-operated in offering fair and meaningful consultation with local councillors and residents.

Suggested Modifications:

Consider brown field sites.

Comments:

Additional Evidence Link:

Comment ID **HRU1161** Site ref (if applicable):

Person ID: **1243900** Name: **Mr Jacob Travis** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

The Local Plan doesn't address the implications of the NPPF particularly paragraph 177 and the associated PPG in the Sustainability of Greenbelt Sites. According to NPPF Para 143 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' I do not believe there are any VERY special circumstances relating to this site. As we have seen in the past few weeks there is extensive flooding (not risk of flooding, actual flooding) on this site and development will contribute to the flooding in the area. I also do not believe the plan is compliant by grouping Greetland with Elland as these are separate areas and should be considered separately. With this in mind there is a disproportionate amount of housing in the plan being allocated to the Greetland area. It is also clear that there is not sufficient infrastructure in place to support these developments.

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

Sound Reason:

GREEN BELT This plot is in highly sensitive Green Belt and fulfills multiple criteria for Green Belt. It is necessary because it creates a barrier for the countryside and loss of this is likely to lead to further building along the valley creating urban sprawl to Barkisland. Calderdale stated the Local Plan will only use 2% of the Green Belt but the proposed development in Greetland are 38% of our Green Belt which is ridiculously disproportionate. A recent report has not been made on available brown field sites, I believe the last one was in 2018, so I do not think they have exhausted these opportunities before looking at Green Belt land. In a recent meeting the Counsellor said it's difficult to get developers to use Brown Field sites 'because it was too messy' and developers prefer green field because it's easier and cheaper. These are not VERY exceptional circumstances. . URBAN SPRAWL / DISPROPORTIONATE The 2017 Calderdale Review identified LP0026 as having a 'highpotential for unrestricted sprawl'. It is important we prevent Urban Sprawl as it separates our Green Belt from urban development and safeguarding the countryside from encroachment. As mentioned above the proposed developments will take away 38% of Greetland's green belt. Without this protection I am sure that 38% will increase over the year. Calderdale Council has declared a "Climate Emergency" and our green belt is a vital tool in the fight against climate change. Allowing the removal of green belt land is in direct contradiction to existing policies around climate change. Also looking at the inclusion of Elland, Greetland, West Vale and Stainland as one in the plan shows how this urban sprawl has already happened. Firstly I feel they should not be grouped together. Greetland is a village in it's own right and the assignment of this many houses to Greetland, not Elland and not Stainland and not West Vale is completely disproportionate and the council should consider adding housing to the plan for other areas. Building an additional 600 houses in Greetland is nearly a 50% increase to the number of houses here. FLOODING THESE FIELDS FLOOD. They also act in absorbing much of the water that if developed on will merely flow down the hill and worsen the flooding in the valley bottom we have just seen. 2015 and 2020

have seen horrendous floods which is costing the council millions of pounds to sort out. Allowing development on this site will only worsen the problem, cause further flooding and increase the amount the council is going to have to spend on flood damages in the future years. Also the impact on flooded communities is horrendous, homes are wrecked, livelihoods destroyed and all this development will worsen the problem. TRAFFIC CONGESTION / HIGHWAYS Greetland already suffers congestion problems and the traffic outside the school in particular is horrendous. There are local plans in place to reduce traffic in Sowerby Bridge by diverting traffic from Ripponden to Greetland along Rochdale and Saddleworth road before the addition all this proposed housing. This will lead to extremely unsafe roads, more potholes on our roads that are already in disrepair and increased travel times for local residents. This will also bring with it high levels of air pollution again contradicting the councils Climate Emergency policies. Small lanes such as Scar Bottom Lane simply can't cope with increased volumes of traffic. These are small country roads that are difficult for multiple cars to negotiate at the best of times. WILDLIFE There is a huge amount of wildlife residing in the field around Greetland including bats, foxes, deer, newts, and badgers to name but a few. If we build on this land this habitat is lost forever. ENVIRONMENTAL HEALTH / NOISE / AIR POLLUTION Calderdale council has declared a Climate Emergency yet we are hear discussing the removal of green belt land which will further add to this. I believe there is a minimum air quality level that we should not be breaching but this is not a target to work towards, it is a minimum level. The new buildings and traffic congestion will severely impact the air quality around Greetland reducing the quality significantly. The increased number of cars on the road and work ongoing will have a significant impact on local residents. INFRASTRCUTURE The local infrastructure in Greetland can't cope with the additional housing developments. My wife is pregnant and recent went to see her midwife who ordered a blood test be carried out, this needed to be done in the next 2 weeks. There were no appointments at the local surgery in West Vale for 5 weeks so she had to go the hospital in Halifax. The school in Greetland is also not able to cope with the increased number of students that these extensive developments will bring. Parents or children can't be expected to be travelling miles and miles to get their children to school. I don't see any plans from the council to develop the infrastructure further and if they do I presume they will have to build on Green Belt land again which will again be showing urban sprawl and further loss of the green belt in Greetland. PLAN NOT RELEVANT I would suggest this plan should be revised following the outcome of BREXIT. The need for housing was built around an economic forecast for growth which is no longer relevant. Previous economic growth targets tied in to the number of new houses needed have not been met and there is nothing to suggest that future levels will meet the forecasts. Therefore proposed housing levels and not accurate, the plan is not relevant and should be revised. I recently moved house within the Greetland area (Rochdale Road to Saddleworth Road) and did not find it difficult to find suitable housing in the area.

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

Duty to Co-operate Reason:

There has been no communication whatsoever by the council on the plan to local residents and the people it will affect.

Suggested Modifications:

Proposed housing development should be removed from the plan

Comments:

Additional Evidence Link:

Comment ID **HRU1162** Site ref (if applicable): **LP0026**

Person ID: **1243906** Name: **Mr Chris Short** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

Although I am not sure if this is legally compliant it seems the rules have not been followed in either consulting/cooperating as nobody I have spoken to has received any information from the council regarding the removal of this land from greenbelt. Also the planning framework states that sites to be removed from greenbelt should only be done so in exceptional circumstances. In this case I see NO EXCEPTIONAL CIRCUMSTANCES.

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

Sound Reason:

Greenbelt - This is currently under greenbelt is home to many different types of wildlife. From either my garden or strolling around the area my wife an I often see different birds of prey kestrels, buzzards. Foxes, rabbits and there is a small number of bats that regularly fly around my house. Owls are often heard. Traffic - these developments bring an increase in traffic. Simple maths 600 homes each with 2 cars = approximately and extra 1200 cars trying to pass through the bottleneck that is West Vale. Despite the road appearing quite wide with parked traffic and relatively inadequate paths on one side it is often difficult to get up and down the road. Pollution - linked to the above you have not given thought to the air quality which would seriously drop, even though at present it is far from ideal due to the queuing traffic that is already often approaching the Sunny Bank annex. Services - school doctors dentists. These are already overloaded so how on earth the extra could be accommodated is a bit of a mystery. Recreational areas - Green and pleasant land will become just a memory in this area as once removed it will not be replaced

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1170** Site ref (if applicable): **LP0026**

Person ID: **1242828** Name: **Mr Charles Littley** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

See Reasons below

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

Sound Reason:

See reasons below

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

Duty to Co-operate Reason:

Greetland has been banded with Elland and Stainland. This is ridiculous and is not a true representation of the situation or the area . Why is this development LP0952, LP0026, LP0177, LP1625,even in the Local Plan when Brownfield sites are available (but been removed) I think that the local community and beyond have been greatly let down by the Council regarding the lack of information they have provided . Surely, every household in Greetland should have had information by post about these plans as the plans for all sites will affect everybody in Greetland ,surrounding areas and other areas in some some way .It is then up to them to object /not object as the case may be .I believe Calderdale Council has not given ALL the community the chance to air their views. I myself would not have known of this plan had it not been brought to my attention by a group on Facebook . I OBJECT to all the sites LP0952, LP0026, LP0177, LP1625 being part of the Local Plan for the following reasons 1. Increased chances of Flooding 2 Loss of Greenbelt , open spaces and Urban Sprawl 3. Increased levels of air pollution 4.Schools , Doctors,Dentists 5. Loss of wildlife and habitat Building on this site which has watercourses and springs ...not good for a new development and not good for any existing properties below or next to the site when the springs are diverted elsewhere by the developers The extra pressure this run off will have on Black Brook ,surrounding flood plains and homes will be devastating. On Sunday 16th of February a protest walk was held by members of the community...Starting at the school down to Black Brook (where last week you would have needed a boat.....the fields were totally flooded) ,up Gatehead Lane and back down Saddleworth Road to the school taking in all of the proposed sites, Site number LP0026 ,Site number LP0177 ,Site number LP0952 ,Site number LP1625 .They will have seen the expanse of run off into Black Brook as they had to negotiate their way through it to get to Gatehead Lane. To build on this site could have catastrophic effects for homes and businesses already in this area and further afield. It just doesn't make sense. Climate change isn't going to go away but we can try to slow down the effect by not creating more problems. Do we want this beautiful valley to become another flood disaster, where people who lose everything are expected to just pick up the pieces and carry on with everyday life as if nothing has happened.The effect on a person's longterm mental health and wellbeing must be huge .Don't build on these sites, surely Prevention is better than Cure and and less expensive in the long run .If these developments were to go ahead who would be accountable when problems start arising .....Calderdale Council ??? Developers ? ? ?? Or will they just take their Â£Â£Â£Â£Â£Â£Â£ and run. Does anyone actually care? Can we have answers please ? The DEFRA 25year plan states that "National flood management involves the use of a variety of measures including storing water on open land". NPPF 14 (157b) states that plans should work to safeguard land from development that is required or likely to be required for current and future flood management. The current policy and legislation on flooding states -“due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere. Chapter 14, paragraph 163 of the NPPF states: -“When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere Boris Johnson has thrown housebuilding plans into confusion, by suddenly calling for an end to construction on flood plains. Around 9 per cent of new homes in England are built on land where there is a -“high probability"□of flooding ; and a recent investigation found that 10,000 are currently in the pipeline. On the campaign trail in flood-hit Derbyshire, the prime minister said: -“We've got to stop building on flood plains. We've got to stop building on areas which are vulnerable to flooding. Calderdale Council Planning Department has a duty of care to comply with current policy and legislation on flooding. Housing should

not be built on sites such as this. Now is the time to step up ,stop building on flood plains and learn by past mistakes . 2. Loss of Greenbelt , open spaces and Urban Sprawl The purposeof Green Belt policy is 'to prevent urban sprawl' and 'to prevent neighbouring towns merging into one another.' The location of this proposed site would go against that ; there would be less clear boundaries between Greetland and Barkisland NPPF Section 13 Protecting Green Belt Land Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: 1) to check the unrestricted sprawl of large built-up areas (2) to prevent neighbouring towns merging into one another (3) to assist in safeguarding the countryside from encroachment (4) to preserve the setting and special character of historic towns (5) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Calderdale Council, in its own evidence, concludes that this area of Green Belt performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt Brownfield sites should be developed first and sites with better infrastructure links. Avoid development upon flood plains. We are compounding the existing risk by continuing to build on flood plains.The more we pave over natural areas the easier it is for water to move across the land and into the rivers.Why have Brownfield sites been overlooked ? Planning framework states that sites to be removed from greenbelt should only be done so in exceptional circumstances.What are the exceptional circumstances ?.....I can't see any . The proposed development represents a disproportionate amount of new development in Greetland . Now is the time to step up,stop building on Green Belt such as this (which helps store water and protects land below thus helping in the prevention of rivers flooding) and learn by past mistakes. 3. Increased Traffic congestion and air pollution The area has not got the infrastructure to cope with anymore traffic .West Vale is a bottleneck at the best of times .Saddleworth Road ,Rochdale Road ,Stainland Road are usually at a standstill. We've had 4/5 way traffic lights for weeks making the congestion worse than ever.Building these planned sites would be madness. It will be easier to go to Oldham shopping etc rather than sit in traffic trying to get to Halifax. There has been 3 way traffic lights on Saddleworth Road and Scarbottom Lane,whilst Gatehead Lane residents just had to take their chance to go when possible.Saddleworth Road has had a lot of roadworks recently ,is this work that needed doing or is it paving the way for plans which haven't been passed yet? 600 new homes ...1200 plus more cars. I quite often see young children (vulnerable members of society) walking to school either with parents or with the Walking Bus maybe in the hope of getting some fresh air and exercise. Walking past queues of traffic with engines running is not a good way to achieve that. Even at school and pre school in the playground children are at risk from air pollution .1200 plus more cars to add to the queues of traffic that line up outside the school on a daily basis. Air pollution causes heart problems /lung problems and others,is this what we should be doing to our children/grandchildren . A little further down Saddleworth Road is an old people's home...Woodfield Grange (vulnerable members of society) This is the introduction to the Calderdale AIR Quality Action Plan *The main reason for tackling poor air quality is to address its impact upon health and quality of life. Its effects are felt particularly by the most vulnerable members of society such as the very young ,the elderly and those already suffering from other health conditions.It is also damaging to the local economy. Poor air quality can result in loss of working days,reduced productivity,increased absenteeism from school and a drain on national health resources. * This plan should be scrapped. 4. Schools ,Doctors ,Dentists Schools are already at capacity.What effect would it have on children already in the area getting places....would they be the ones having to go to schools elsewhere. Doctors and dentists are working at full capacity. Are you planning on new schools, doctors surgery etc and if so where will all these be built.....on more Green Belt ? 5. Wildlife and habitat Last but not least the wildlife and their habitat would reduce dramatically. In this area there are many species dwelling here, deer,foxes,buzzards,owls,kestrels,herons,bats and lots more. The area is a wildlife corridor which will get smaller and smaller and eventually we will lose the wildlife.Loss of habitat caused by developers who are interested in one in one thing and one thing only ....Money. Let's hope Calderdale Council do the right thing and scrap these plans.

Suggested Modifications:

LP0177...LP0952..LP0026..LP Don't build on these flood sensitive sites leave them as Green Belt .

Comments:

Additional Evidence Link:

Comment ID **HRU1179** Site ref (if applicable): **LP0026**

Person ID: **1242476** Name: **Miss Joanne Nolan** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Loss of large area of Green Belt and Wildlife Corridor Current Chronic Congestion in West Vale, and the effect on Air Quality Lack of Infrastructure Flooding Risk Loss of large area of Green Belt and Wildlife Corridor The green belt should be protected. If this development goes ahead Greetland will have no green space left. Brown fields should always be used first. The proposed plans are to be built on a wildlife corridor and we must do everything we can to protect the wildlife, I have lived near the site for over 15 years and regularly see black Brook, Heron's, foxes, bats, deer. Housing on this land will have a significant impact on the diversity of the land and would destroy this precious Eco-system. Current Chronic Congestion in West Vale, Greetland and the effect on Air Quality The traffic lights in West Vale, at the junction of Saddleworth and Stainland Roads are already at breaking point at peak time, daily there is huge queues extend back up Saddleworth Road (and Rochdale Road) in both directions, as well as up Stainland road every morning, and again each evening. There is simply too much traffic now for this junction to work and the proposed amount of housing will only add to the currently strained local roads. The effect on Air Quality that all this congestion causes is undeniable and to build new communities directly on already highly polluted and congested roads, increasing the threat to all of us. We cannot let these plans go ahead. Lack ofInfrastructure The proposed development is completely disproportionate to the size of the village. Greetland is a village not a town. Doctors and additional amenities are already stretched, Housing to this proportion without additional facilities is unthinkable, the local schools are full, and with a proposed 600 houses, it would indicate another c200 places would need to be found! The proposed plans make no provision for extra school places, let alone Doctors and Dentists. The infrastructure needed to accommodate the size of the proposed development simply does not exist, so the proposed development must not be allowed to proceed. Flooding Risk The land is a natural flood plain and natural springs flow down to the Greetland hillside to the proposed site. Building on this site would only increase other areas to flood. The current risk of flooding to the Greetland and West Vale areas, as well as further downstream into Elland should be a strong enough fact on it owns to remove this site from the Calderdale Local Plan. In 2015 significant flooding was caused to the Calder Valley including Elland and this again was seen in February 2020, the flooding was severe, and much of the proposed site has been under water since the events of latest flooding. This happens regularly, this is not a one-off occurrence's! Significant flooding will occur to property and business if the plans are to go ahead. Future development of the site would itself be under serious threat of severe and repeated flooding

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU118** Site ref (if applicable): **LP0026**

Person ID: **1241581** Name: **Mrs Michelle Audis** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

It is unnecessary and unsustainable to build the amount of new homes designated for this site. The impact of the planned, new houses will have a negative impact on the lives of local people including: The volume of increased traffic congestion and noise. The roads in Greetland are terrible right now and our public transport system can not deal with more people using that service. Flooding. Each year we have issues with flooding. By taking away our greenbelt land, where will the water drain. We frequently hear stories regarding new housing developments that have been built and have negatively impacted on the absorption of rain water - causing flooding. Air Pollution. We choose to live in a rural environment and bring our families up here so that they can enjoy and benefit from the air. By building unnecessary housing, you are impacting on the quality of air and environment of where we live.

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

Sound Reason:

The proposed site will create a flooding risk and risk to local wildlife

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

Duty to Co-operate Reason:

The site is a small area of greenbelt land which will impact negatively on local wildlife and transport links

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1184** Site ref (if applicable):

Person ID: **1243917** Name: **mrs rachael illingworth** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

Land allocation It's difficult to understand from the information provided why Greetland has been categorised in with other local areas , I.e Elland and Stainland, which when added together presents a misleading position of the area and the impact of so many additional homes. In addition, the only reason established (or communicated) for not focusing developments across a broader area of Brownfield sites is due to the additional costs to developers. This, in anyone's eyes, cannot be deemed 'exceptional circumstances' and the council clearly had not explored all other available options for development. Given the scale of the Calderdale area putting the majority of their housing plan across 2 close villages on green belt land says more about the politics between the different councillors representing different parties than it does about their planning capability Building up to 600 new homes in one village, along one road, increasing the village capacity of urban sprawl (1041 additional units overall in a village less than 3000 dwellings!) with no clear plan to mitigate the above issues defies any logic or common sense. The lack of thought, consideration and transparency of process provides no confidence the plans will implemented with any degree of success. Therefore, as a family we strongly oppose any plans to build on all sites given the lack of infrastructure and impact on pollution and wildlife in the area, the disregard for history and heritage and the disriportunate impact of the houses being build on one main road in one village. I would also be very keen to understand the exceptional circumstances to justify building on greenbelt to this extent in one village with a number of brown belt sites left in derelict in this and other wards? There are currently 135 properties for sale on right move in HX4 alone with a number of friends having to rent their houses as unable to sell Despite the lack of infrastruce, impact on wellbeing and quality of life of children, safety of the road and air pollution I cant see how this plan is sound or legal and it does not conform to central govement policy or current legislation with regards to building on flood risk areas. It also does not conform to any commitments the govement has made on tackling air pollution and flooding in the area Compliance / Lack of Transparency Calderdale council have failed to make Greetland residents aware of these plans, timescales, and the need to submit objections following recent changes and re introduction of land. The whole process lacks transparency and seems underhand. The fact the section along one stretch of road has been split into 4 areas, the complexity of the submission page and where to find the plots given they have classed under a different village name (Elland) which Greetland has never been linked to. Also from the start there was a lot of talk that this is a done deal from people who knew people who worked at the council and local farmers who's land will be sold. When objections have been submitted they have been changed or vastly delays going on the system so no one can read them. My 72 year old mother in law cried the other day after trying to object at how complex the whole system is and how her and her friend at the church and other high numbers of elderly on the area felt they were letting the community down with how complex and unsupported the process is. Also a number of times I have tried to do on the system for it to shut down with a number of error messages (one being -“the event is not currently available for consultation!??)

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

Sound Reason:

Wildlife We used to live in Leeds but moved to Greetland so our children could grow up in the countryside alongside wildlife. We often go for family walks along the wildlife corridor and see a vast number of animals such as deer, hedgehogs, beavers, owls, Herron and I have been told of a number of bats in the area. I just cant get my head around what exceptional circumstances with a vast number of derelict brown

field sites unsupported would allow the vast development proposed along this precious wildlife corridor on green belt land ; not withstanding the years of disruption and noise the building at this scale would pose to the wildlife and the children at the local school. I would seriously question the mitigating risk of this in the plans and the extent to which the real level of wildlife in the area has been captured Flooding Development along Saddleworth Road will result in surface run off, impacting the entire area. Greetland already suffers from flooding across this proposed site. These fields act as a natural flood defence and housing development will surely increase the problem and create more flooding in the West Vale area. It is not small scale as recently demonstrated when the water ran down and flooded a number of properties and commercial outlets in west vale. The water was so strong a shipping container was removed from a west vale rugby club causing damage to a bridge in Ellend. With the current government commitments and the complex nature of the springs leading down the fields in Greetland how can turning these vast fields into concrete support and prevent the flooding which is regularly seen. The small area of land marked as flood plane already regularly goes into residents gardens, many roads all the way along from saddlewprth road are often more like streams with Gate house land and other areas being prone to flooding. The NPPF states no development is to be permitted on land that is liable to flood. With millions of tax payers money being spent on flood defences in the area which still don't prevent flooding how can any of this land be classed as not liable to flood (lots of photographic evidence over the years and this year of this across all 4 proposed sites in Greetland) How can the prime minister commit to stop building in areas of high probability of flooding when the majority of Calderdale housing plan is in an area which regularly floods? The mitigation comments on the plans show a real lack of understanding of the wider impact of the area and how often the area floods - additional trees should be planted anyway to support the local areas when are often flooded in west vale not as a half hearted attempt to replace aches of fields with concrete Infrastructure Traffic - There's a significant issue with congestion along Saddleworth Road as it stands, particularly around West Vale junction where it often takes over 20 minutes just to get through 1 set of lights. Building any additional homes that will use this junction will just compound this existing issue. But building up to 600 homes along one road without significant infrastructure improvements will be detrimental to the area. It was also increase the number of cars heading up to and from the M62 motorway, already an extremely busy route with long wait times at peak times, putting people off moving to the area. The road is also used for many heavy vehicles such as large lorries and tractors (I would say 1 in 7 vehicles is a HGV) this is only going to get worse with planning permission for a HGV turning circle being agreed to send large vehicles away from Sowerby bridge and down Saddleworth road into Greetland. In an area which is high for families, has a school on the main road and is already heavy congested how can the council think adding any more traffic (never mind 600 houses worth) on one road is a logical decision School ; Greetland (Sunnybank) is at full occupancy with some years over subscribed. Expansion of the school would be needed to support any additional homes or will existing and new residents be expected to move out of the area? There are no available plans on how this issue will be mitigated. It is also on the main road which given the traffic issues raised above gives major concern for air pollution for our children ; how will this be mitigated? Doctors ; Again, an element of our infrastructure that is already at breaking point, with significant wait times for appointments. Additional homes will further strain this and increase the traffic around the west vale junctions. Safety The amount of traffic moving along Saddleworth Road at peak times currently presents a significant risk. This is particularly apparent at school pick up and drop off times. Just before Christmas my father had an accident whilst dropping both our Children off for school. The sheer amount of traffic and the narrowing of lanes (due to parked cars and HGV's) results in someone reversing into his car and causing a serious head injury. Luckily the children weren't in the car at the time. More housing will cause more injuries and safety concerns.

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

Duty to Co-operate Reason:

Compliance / Lack of Transparency Calderdale council have failed to make Greetland residents aware of these plans, timescales, and the need to submit objections following recent changes and re introduction of land. The whole process lacks transparency and seems underhand. The fact the section along one stretch of road has been split into 4 areas, the complexity of the submission page and where to find the plots given they have classed under a different village name (Elland) which Greetland has never been linked to. Also from the start there was a lot of talk that this is a done deal from people who knew people who worked at the council and local farmers who's land will be sold. When objections have been submitted they have been changed or vastly delays going on the system so no one can read them. My 72 year old mother in law cried the other day after trying to object at how complex the whole system is and how her and her friend at the church and other high numbers of elderly on the area felt they were letting the community down with how complex and unsupported the process is. Also a number of times I have tried to do on the system for it to shut down with a number of error messages (one being -"the event is not currently available for consultation!??)

Suggested Modifications:

Brown fields sites in the area need to be considered before mass building on green fields in one village, along one busy road which has a school on it. Given the flooding in the area to even propose to reduce the flood plain appears unconsidered at best with no real plan on how the already strained infrastructure could support this. This needs to be considered alongside other plans - such as the turning circle which is designed to push more heavy vehicle traffic down Saddleworth road

Comments:

Additional Evidence Link:

Comment ID **HRU1186** Site ref (if applicable):

Person ID: **1243917** Name: **mrs rachael illingworth** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

Building up to 600 new homes in one village, along one road, increasing the village capacity of urban sprawl (1041 additional units overall in a village less than 3000 dwellings!) with no clear plan to mitigate the above issues defies any logic or common sense. The lack of thought, consideration and transparency of process provides no confidence the plans will implemented with any degree of success. Therefore, as a family we strongly oppose any plans to build on all sites given the lack of infrastructure and impact on pollution and wildlife in the area, the disregard for history and heritage and the disriportunate impact of the houses being build on one main road in one village. I would also be very keen to understand the exceptional circumstances to justify building on greenbelt to this extent in one village with a number of brown belt sites left in derelict in this and other wards? There are currently 135 properties for sale on right move in HX4 alone with a number of friends having to rent their houses as unable to sell Despite the lack of infrastruce, impact on wellbeing and quality of life of children, safety of the road and air pollution I cant see how this plan is sound or legal and it does not conform to central govement policy or current legislation with regards to building on flood risk areas. It also does not conform to any commitments the govement has made on tackling air pollution and flooding in the area Land allocation It's difficult to

understand from the information provided why Greetland has been categorised in with other local areas , I.e Elland and Stainland, which when added together presents a misleading position of the area and the impact of so many additional homes. In addition, the only reason established (or communicated) for not focusing developments across a broader area of Brownfield sites is due to the additional costs to developers. This, in anyone's eyes, cannot be deemed 'exceptional circumstances' and the council clearly had not explored all other available options for development. Given the scale of the Calderdale area putting the majority of their housing plan across 2 close villages on green belt land says more about the politics between the different councillors representing different parties than it does about their planning capability

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

Sound Reason:

Infrastructure Traffic - There's a significant issue with congestion along Saddleworth Road as it stands, particularly around West Vale junction where it often takes over 20 minutes just to get through 1 set of lights. Building any additional homes that will use this junction will just compound this existing issue. But building up to 600 homes along one road without significant infrastructure improvements will be detrimental to the area. It was also increase the number of cars heading up to and from the M62 motorway, already an extremely busy route with long wait times at peak times, putting people off moving to the area. The road is also used for many heavy vehicles such as large lorries and tractors (I would say 1 in 7 vehicles is a HGV) this is only going to get worse with planning permission for a HGV turning circle being agreed to send large vehicles away from Sowerby bridge and down Saddleworth road into Greetland. In an area which is high for families, has a school on the main road and is already heavy congested how can the council think adding any more traffic (never mind 600 houses worth) on one road is a logical decision School ; Greetland (Sunnybank) is at full occupancy with some years over subscribed. Expansion of the school would be needed to support any additional homes or will existing and new residents be expected to move out of the area? There are no available plans on how this issue will be mitigated. It is also on the main road which given the traffic issues raised above gives major concern for air pollution for our children ; how will this be mitigated? Doctors ; Again, an element of our infrastructure that is already at breaking point, with significant wait times for appointments. Additional homes will further strain this and increase the traffic around the west vale junctions. Safety The amount of traffic moving along Saddleworth Road at peak times currently presents a significant risk. This is particularly apparent at school pick up and drop off times. Just before Christmas my father had an accident whilst dropping both our Children off for school. The sheer amount of traffic and the narrowing of lanes (due to parked cars and HGV's) results in someone reversing into his car and causing a serious head injury. Luckily the children weren't in the car at the time. More housing will cause more injuries and safety concerns. Wildlife We used to live in Leeds but moved to Greetland so our children could grow up in the countryside alongside wildlife. We often go for family walks along the wildlife corridor and see a vast number of animals such as deer, hedgehogs, beavers, owls, Herron and I have been told of a number of bats in the area. I just cant get my head around what exceptional circumstances with a vast number of derelict brown field sites unsupported would allow the vast development proposed along this precious wildlife corridor on green belt land ; not withstanding the years of disruption and noise the building at this scale would pose to the wildlife and the children at the local school. I would seriously question the mitigating risk of this in the plans and the extent to which the real level of wildlife in the area has been captured Flooding Development along Saddleworth Road will result in surface run off, impacting the entire area. Greetland already suffers from flooding across this proposed site. These fields act as a natural flood defence and housing development will surely increase the problem and create more flooding in the West Vale area. It is not small scale as recently demonstrated when the water ran down and flooded a number of properties and commercial outlets in west vale. The water was so strong a shipping container was removed from a west vale rugby club causing damage to a bridge in Ellend. With the current government commitments and the complex nature of the springs leading

down the fields in Greetland how can turning these vast fields into concrete support and prevent the flooding which is regularly seen. The small area of land marked as flood plane already regularly goes into residents gardens, many roads all the way along from saddlewprth road are often more like streams with Gate house land and other areas being prone to flooding. The NPPF states no development is to be permitted on land that is liable to flood. With millions of tax payers money being spent on flood defences in the area which still don't prevent flooding how can any of this land be classed as not liable to flood (lots of photographic evidence over the years and this year of this across all 4 proposed sites) How can the prime minister commit to stop building in areas of high probability of flooding when the majority of Calderdale housing plan is in an area which regularly floods? The mitigation comments on the plans show a real lack of understanding and wider impact of the area

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

Duty to Co-operate Reason:

Compliance / Lack of Transparency Calderdale council have failed to make Greetland residents aware of these plans, timescales, and the need to submit objections following recent changes and re introduction of land. The whole process lacks transparency and seems underhand. The fact the section along one stretch of road has been split into 4 areas, the complexity of the submission page and where to find the plots given they have classed under a different village name (Elland) which Greetland has never been linked to. Also from the start there was a lot of talk that this is a done deal from people who knew people who worked at the council and local farmers who's land will be sold. When objections have been submitted they have been changed or vastly delays going on the system so no one can read them. My 72 year old mother in law cried the other day after trying to object at how complex the whole system is and how her and her friend at the church and other high numbers of elderly on the area felt they were letting the community down with how complex and unsupported the process is. Also a number of times I have tried to do on the system for it to shut down with a number of error messages (one being -“the event is not currently available for consultation!??)

Suggested Modifications:

Brown fields sites in the area need to be considered before mass building on green fields in one village, along one busy road which has a school on it. Given the flooding in the area to even propose to reduce the flood plain appears unconsidered at best with no real plan on how the already strained infrastructure could support this. This needs to be considered alongside other plans - such as the turning circle which is designed to push more heavy vehicle traffic down Saddleworth road

Comments:

Additional Evidence Link:

Comment ID **HRU1187** Site ref (if applicable):

Person ID: **1243922** Name: **Mrs Julie Wollin** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

I don't feel qualified to comment on the legality of the plan.

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

Sound Reason:

Main points of objection: Air pollution and traffic Our roads are already at capacity and would not be able to cope with increased traffic. The journey into Halifax should take 10 minutes but at peak times it can take up to 45 minutes. Any increase in traffic will also cause a significant increase to air pollution. Loss of greenbelt and impact on wildlife corridor Greenbelt should be protected. It is used and enjoyed by walking groups, individuals and children and beneficial to everyone's mental health. If the plans being proposed are given the go ahead then the wildlife in our village would be decimated and we would lose the opportunity to enjoy seeing all the various birds, bats and hedgehogs that currently live in Greetland. Infrastructure Greetland is a village not a town. The size of the proposed development is disproportionate to the size of the village. Doctors, dentists, hospitals and schools are already under strain and would not be able to cope with the addition of 600 plus households.

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

Duty to Co-operate Reason:

I don't feel qualified to comment.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1192** Site ref (if applicable): **LP0026**

Person ID: **1243919** Name: **Mrs Sara Cooley** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

Building on flood plains and greenbelt land is not part of government policy as shown in the NPPF and PPG. This land in this proposed site is always sodden, even in the summer time. If building is allowed on this land, this water, which is usually absorbed by the grasses, trees, etc... will be forced further down the valley causing flooding locally as well as further afield in West Vale, Elland and even Brighouse. In the recent flooding caused by Storm Ciara, houses on Woodfield Drive, narrowly escaped flooding in their homes, if this development is allowed to happen, those residents would not be so fortunate next time. The impact on local wildlife will be enormous. Deer, herons, kingfishers, badgers & bats are amongst many species resident along the current wildlife corridor. Even if a smaller wildlife area is retained, the impact will be huge as many species will leave due to the disruption of the building works and they may never return.

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

Sound Reason:

SOUNDNESS I do not believe the plan is positively prepared since local infrastructure, including, but not limited to, health services & schools will not cope well with the increased population in the local area. All local schools are running at full capacity and there is no consideration in the plan to extend or build new schools. Traffic will be especially affected since the majority of journeys will be on or around Saddleworth Road. New residents will need to commute to work at peak times as there is a lack of employment opportunities within walking distance of the site. West Vale is already gridlocked during rush hour. Public transport is very limited in the area with 1 bus per hour going to Halifax and another going to Huddersfield. These services use Brian Royd Lane & Scar Bottom Lane to travel between Saddleworth Road and Rochdale Road. These roads are essentially single track roads when used by the bus so an increase in traffic accessing the new houses (as well as using the link between Rochdale & Saddleworth Roads) will make delays and potential accidents/ scrapes more likely. Saddleworth Road is also frequently used by large lorries travelling to and from the Sonoco Recycling Plant, local quarries & Bosch Factory. Gridlocked traffic will affect these businesses adversely. The increase in traffic, particularly gridlocked traffic, will affect air quality which is especially important since the local infant & junior schools are situated next to the main roads. This contravenes government policy on air quality. EFFECTIVE There is a disproportionate amount of development proposed for Greetland. Greetland has already undergone significant development in recent decades, with developments of Templars Close, Daleside & Trenance Gardens significantly increasing the size of the village to the West. When considering Greetland as part of Elland, the increase in population seems reasonable. However when taken on its own, the increase to the village of Greetland would be around 15 - 20% based on figures from the last census which show the population of Greetland to be 11,389. Increasing the village by almost a fifth in such a short period of time is neither practical nor an effective way to provide sustainable development. NATIONAL POLICY As stated previously, building on flood plains and green belt land contravenes government policy.

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

Duty to Co-operate Reason:

I have had no formal communication from the council regarding these plans which will have a huge impact on my family's life. I have not seen any publicly posted notices with the exception of posts from Calderdale Council on facebook. How many residents who do not have access to facebook are even aware of these proposed changes to the local plan which was previously agreed on?

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1196** Site ref (if applicable):

Person ID: **1241581** Name: **Mrs Michelle Audis** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

The plan is to build on areas of Green Belt or Green field in order to make profit. As a resident, I moved here to benefit from areas of countryside. I moved from a city or area of urban sprawl in order to benefit

from areas of natural beauty. Once theses areas have been lost, we can never get them back, we would suffer from: Increased traffic pollution Loss of wildlife Flooding The schools are already full as are the doctors The roads and infrastructure could not take more cars

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

Sound Reason:

The areas for housing seem to sit within the Greetland area, there are no houses planned for the Stainland area. The impact that building these houses will impact on the local community for years to come. This is not a right here and now issue, this will be detrimental to the community and environment for years and years to come. Problems such as higher water, air and noise pollution, increased traffic, more fatalities, increased car dependency and dependency on roads and public transport that are already insufficient. Traffic congestion is getting worse and worse, on both Rochdale and Saddleworth roads. There is no way of making this better for current residents so building 600 houses is simply going to make this worse. Air pollution will affect residents massively.By increasing the number of cars and the number of car journeys, this is simply going make a problem even worse. The schools and local Surgeries are already full, the sewers are already flooding. The areas around the four sites is Grade 3 agricultural land which, by Calderdale's own recognition, is an important commodity inlight of climate change. The Woodland Trust has just supported the donation of over 100 tress that are recommended for this area. The fields have natural springs which run through the sites. By digging these up, in order to build houses, there won't be anywhere for this running to run through, hence making the area a flood risk. In light of the recent storms, we have all witnessed what can happen when there is nowhere for the water to soak into. Green areas and natural areas are important to the mental health and physical wellbeing of residents. The proposed urban sprawl will impact negatively on residents, taking away areas of natural beauty.

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

Duty to Co-operate Reason:

Calderdale council have not communicated these plans sufficiently. I have had to find out about the plans through Friends and social media. The council website is not easy to use, it crashes, doesn't record objections, simply doesn't let you log in. We seem to have hit against problems at every turn when trying to object to the plan.

Suggested Modifications:

The four sites of LP0026, LP0952, LP0177 LP1625 to be removed from the plan.

Comments:

Additional Evidence Link:

Comment ID **HRU1197** Site ref (if applicable):

Person ID: **1243910** Name: **Mrs Diane Taylor** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

My understanding was that land was only to be removed from Greenbelt land in exceptional circumstances. There are no exceptional circumstances when there are undeveloped Brownfield sites in the area. I refer to the NPPF para 177 and the associated PPG in the sustainability of Greenbelt land.

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

Sound Reason:

Wildlife - To lose the greenbelt in this area would be extremely detrimental to the wild animals in the area. Once this land is gone it is gone forever. I often witness many species of wildlife including deer, bats, newts, hedgehogs, woodpeckers, foxes and owls. No mitigation can prevent the impact of urban sprawl and destroy their natural habitat. Loss of greenbelt - This land is precious to this community and the wider community from a visual, physical and emotional perspective. It is fundamental for our lifestyle to be in touch with nature to support both mental and physical health. We need areas like these that are free and easy to access. Infrastructure ; The sewer system is at capacity already. Greetland may have sufficient school places to meet the needs of the existing community but it certainly doesn't for 600 more families. The schools in this area are Academies and can't be forced to expand, this would mean parents using their cars to transport their children to school. The roads into West Vale are already unable to cope with the volume of traffic. All doctors and dentists are full. I have been living in Greetland for 11 years and travel to Ripponden to the doctors and have only just received a place at the dentist in West Vale in December. Air Pollution ; West Vale and Ripponden are already unable to cope with the volume of traffic during rush hours. Saddleworth Road outside the KS1 site of the Greetland Academy is an accident waiting to happen. Cars are double parked from the Nursing Home all the way up past Sunnybank Drive. The volume and speed the HGV travel up and down Saddleworth Road to the Sonoco factory and Bosch factory is already a high risk to children walking to and from school. More traffic on these roads would not only increase the risk of accidents but also the increase in air pollution would cause a serious health risk to the children both walking to school and those already at school playing in the grounds. The increase in air pollution ignores the recommendations of PHE. Children aren't just walking to Greetland school down Saddleworth Road but children walk to Brooksbank High School, the children are all walking where there will be a constant que of vehicles, where the pollution would be harmfully concentrated. Flooding ; Sites LP0952, LP177, LP953 and LP1625 are so close in proximity that they can't be viewed as individual sites as the overall impact of the local plan would be catastrophic to Greetland as a whole. The land LP0026 doesn't flood to the extent the other sites do however this site soaks up a huge amount of water, water that would go down stream if this land was built on and cause detrimental effects on existing housing in Greetland and have serious downstream effects in West Vale. The land in Greetland is full of natural springs, we have a pump in our back garden due to the amount of water coming through the land. If we didn't have this our garage would be flooded most of the year.

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

Duty to Co-operate Reason:

I have had no contact from the local council regarding the considered development. The plans are not current and not compliant. Economic growth needs to be reviewed and a new plan developed in line with the changes.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1221** Site ref (if applicable): **LP0026**

Person ID: **1243929** Name: **Mrs Rachel Taylor** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

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

Sound Reason:

As sites LP26, LP177, LP953 and LP1625 are so close in proximity they cannot be viewed individually as the overall impact of the local plan would be catastrophic to Greetland as a whole and the surrounding areas. Under the Calderdale Review of Polling Districts 2019, the number of properties per polling district is as follows: Greetland 1221, Sunnybank 505, West Vale 1119. This totals 2,845 properties. The greenbelt land in Greetland is classed as highly sensitive on the Local Plan and has been designated as a -“ wildlife corridor "It is important to all and used by many. There are fields leading down to the Black Brook where wildlife (some of it protected) including deer, badgers, herons, barn owls, woodpeckers, king fishers and bats thrive. The river, trees and farmland provide amongst other activities space for family walks, cyclists, dog walkers, nature rambles by local children. Surely we do not want to lose this space? All of this would be lost should the 600+ properties be built on the green belt land identified. The revisions to the plan (i.e. the addition of the new sites) proves further unsustainable development with a disproportionate amount of new homes proposed across four sites in Greetland with 1,041 additional units of the 1,708 on new housing sites (over 60%) proposed in the Elland area. There are previous plans for a greenway to be extended along the wildlife corridor so that more residents can take advantage of the nature offered by Greetland. Let's do this! I also refer to the National Planning Policy Framework (NPPF) Feb 2019 para 137, point c which covers that building on greenbelt should only be considered in exceptional circumstances. I ask -“Has brown field development in this area really been exhausted?"Can we not re-utilise these sites ahead of greenbelt (for example the plot where a mill has been demolished at West Vale). There would be an increase in noise and light pollution spoiling the rural aspect of our village. Air Pollution The Clean Air Strategy 2018 quotes that while we do need to ensure economic growth, we also need to realise the cost of air pollution on health. The recent research commissioned by Public Health England shows that air pollution affects the population by increasing health and welfare costs by up to Â£18.6bn by 2035. It is found that the single biggest air polluter is traffic. Such building along Saddleworth Road would lead to an increase in the traffic heading through West Vale traffic lights. Calderdale Council are aware that the traffic volume at West Vale is already at 117% with daily queues already leading back from the traffic lights up as far as the school. Surely the traffic fumes and sheer volume of more impatient drivers is a risk to the safety, health and wellbeing of the 4-7 year olds who attend the Sunny Bank Annex of Greetland School? We are already waiting for an accident to happen here or from increased volume of traffic further through West Vale at the West Vale School. Flood Plain Do we really want to build on this land which has proved in the

past to be subject to flooding from the Black Brook? Calderdale have declared climate emergency! I attach my photograph to show the recent flooding effect on this plot. It seems irresponsible to build here when such flooding would lead to insurance being unavailable followed by questions around why Calderdale Council allowed building here. -“I understand that Councils are stuck between the Government demands for housebuilding and the difficulties of identifying suitable sites however I urge you to look at the planning policy and the relationship between housing numbers and the pressure of flooding"Cllr Swift. The current village of Greetland is built on a hillside and there are hundreds of springs which appear after heavy rain throughout the year. These springs have increased in volume and quantity since earlier building projects in the Greetland area. All of this excess water heads down through the areas identified for building on their way to the Black Brook. With buildings in the way there will be huge impact both locally and further downstream at Elland Bridge. The water has nowhere else to go! Diverting these springs leads to flooding of land which has not been flooded before. According to www.environmentlaw.co.uk the wide scale flooding incidents in the UK and the threat of climate change, new developments in flood risk areas would only be allowed when it is exceptionally necessary and when it does not increase the risk of flooding in the developments, the community or elsewhere. We need to question the Council's Sustainability Appraisal process to support the release of the new sites with the site at 'Land adjacent Ellistones Place' (Ref: LP0177). This appears to be a completely unjustified recommendation. The site report states that the assessment of SA7 is 'Negative' and marked 'RED' commenting that ''Overall the impact is negative as the site is greenfield and lies within flood zones 2 and 3''. Based on this information this site should be excluded! Infrastructure School ; The Greetland School has some 400 pupils and is outstanding. We know why the land would seem a great prospect for these building plans. However the school is full ; it cannot take the extra children who would be in the proposed developments. It is also worth noting that the proposed housing would be the prime catchment area for the school so that children at the top end of the village, where the 7-11 year olds attend, would lose out on places at the school. This is despite the fact that para 94 of the NPPF states that it is -“important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive positive and collaborative approach to meeting this requirement"Doctors/dentists ; Again the facilities for the Greetland population are already at breaking point ; where is it planned that the extra population will be accommodated? Public Transport - Saddleworth Road buses are shockingly poor as it is. But be aware that putting on more buses will only increase the traffic situation around tight corners at West Vale. Sewers ; these are over flowing with Saddleworth Road and the surrounding roads which lead into Saddleworth Road are constantly being dug up to resolve leaks and blockages. Conclusion This all adds up to the fact that the proposed plan is not sustainable in NPPF terms. When the harm Identified is taken into account then the proposal do not amount to sustainable terms!

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

As a Greetland resident I can confirm that I have received nothing official from Calderdale Council regarding the development of the sites along Saddleworth Road. Thank goodness for Facebook.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1232** Site ref (if applicable): **LP0026**

Person ID: **1243932** Name: **Mr Bradley Smith** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

The plan is not legally complacent as does not comply with the NPPF

Do you consider the plan to be Sound?: **No**

Sound Reason:

I do not consider the local plan to be sound as it doesn't comply with the NPPF. I haven't got a full day to list my reasons to object, it took my wife a full day to do this yesterday. When looking at the NPPF, it is clear that the local plan is in breach of regulation for some many reasons- green belt, flooding , infrastructure, pollution implications, wildlife and so many more. it is ludicrous that this plan has even been suggested in the first place.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

I would like the plan removed as is does not comply with the NPPF.

Comments:

Additional Evidence Link:

Comment ID **HRU1248** Site ref (if applicable): **LP0026**

Person ID: **1243409** Name: **Mrs Sophie Midgley** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Land which is classified as Green belt should be protected unless in Exceptional circumstances. I do not believe this is in anyway an exceptional circumstances, to build on an area of green belt. There are areas of brown belt within the area. Could these not be considered instead? The area is a wildlife corridor and there will be a great impact on this if this land is built on

Do you consider the plan to be Sound?: **No**

Sound Reason:

The area for this proposed build is on a natural flood plain. The natural springs running through the area end up at the proposed site and as has been demonstrated with the recent floods the land can not cope with the level of water. If this land is built on where will this water end up. The houses in the surrounding

area will be majorly affected. West vale will be affected. Newbank Garden centre, Heath rugby club already flood, this will increase. In 2015 Elland Bridge collapsed due to flooding. If the water from this area is diverted these areas will be impacted. Saddleworth road is already incredibly busy with many cars travelling through it. The impact of a potential extra 1200 cars travelling will make an already busy area impassable. There is a primary school on the same road and I worry the increased level of pollution and the danger of the extra traffic will be detrimental for all the children and residents of the area. The infrastructure of the area is at capacity already, traffic, schools, doctors. How will all these services cope with a massive influx of new residents. An extra 600 houses in the area would have an catastrophic impact on the area and to all the people who live here.

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 **HRU1254** Site ref (if applicable): **LP0026**

Person ID: **1243877** Name: **Mrs Pauline Atkinson** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

I do not consider that it is a sound plan for the following reasons, Infrastructure Building new houses away from amenities and town centres with no proposed infrastructure results in a negative impact on the whole planet. This in not town planning this is a knee jerk reaction to an uplift requirement in the housing numbers. The resulting extra traffic will result in extra CO2 emissions this does not correlate with the councils Clean Air policy. How can the council expect residents to use public transport and cycle routes where there are NO PLANS for any infrastructure in Greetland. A train station in Elland does not help as the proposed houses are to be built in Greetland not Elland. Green Belt The NPPF states once established Greenbelt boundaries should only be altered when exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. This has not been demonstrated. Brownfield sites must be exhausted. There is a brownfield site for sale on Saddleworth Road which must be considered first. Other housing developments in town and city centre served well with public transport should have the density optimised. Could this be done? Have discussions with other neighbouring authorities taken place to identify if they could accommodate extra housing. The inspector acknowledges that the relationship between employment growth and new housing is complex and the Turely (2019) report on - “modelling the economic implications of the proposed housing requirements Calderdale council" whilst this report contributes to how the labour force is assumed to behave, it doesn't appeared to consider

accommodating the houses in neighbouring authorities. It is therefore felt that the council has not fully exhausted all options in order to prevent the development on Green Belt. The development will be more than 2KM from a train station. Development of LP0026 will result in urban sprawl Grade 3 agricultural land will be lost. There are many trees with TPO on in site LP0026. Loss of habitat for animals such as Woodpecker, deer, pheasants, owls, bats, Kestrels and herons. I have newts in my pond as well as frogs I am concerned if developments goes ahead the newts will not return. Flooding I have lived in Greetland for 43 years. In the past 5 years I have noticed the flooding getting a lot worse, however there has been minimal flooding of houses in Greetland as sites such as LP0026 have acted as flood plains. With developments of these sites I am concerned that when the next extreme weather arrives people's homes and businesses will flood. The environment Agency classes this site as having a high flood risk.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Remove site from the Local plan

Comments:

Additional Evidence Link:

Comment ID **HRU1276** Site ref (if applicable): **LP0026**

Person ID: **1243947** Name: **mrs susan brook** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

See attached file

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5609748

Comment ID **HRU1285** Site ref (if applicable): **LP0026**

Person ID: **1243514** Name: **Dr Dale Pateman** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

This proposed development plan as we see it now is a revitalised version of what we saw a couple of years ago, but things have changed since then. The housing requirement is based upon the economic growth plan which itself has fluid foundations given the continuing effect of globalisation and specifically the brand new relationship between the EU and an independent UK. This fluidity is not to be underestimated, not only in Calderdale, but for the nation. We have, as a community, a responsibility to respond to this for the good of us all. Plans, policy and legislation as developed by various responsible authorities have great difficulty in keeping up with events, which are changing weekly. Individuals and Councils alike have a responsibility to observe what is happening. In respect of the proposed housing plan, my view is that Calderdale Council have taken on board the requirement imposed by central Government, even if (as is most likely) it is out of date. But in response, they have elected to take a top down approach so as to most easily comply. The proper approach would be a bottom up view which would include detailed subjective analysis of the gain/loss to the whole community as well as to the Council itself. The top down approach has the undesirable effect of failing to properly address the following significant factors. Flood risk. The whole of the extensive hillside, which is Greetland, is afflicted by spring water arising from a complex system of pervious and impervious layers of ground strata. What would be the effect of additional construction and sealing of the ground surface? In any case the result is that land adjacent to the Black Brook is frequently flooded, to a measurable depth, following periods of heavy rainfall. The effect of the early February 2020 rainfall supports this. Construction of any development on this hillside would exacerbate this effect and cause potential additional problems everywhere downstream of any development. Congestion. It is the view of many that current levels of traffic are just acceptable. The additional load of traffic resulting from the proposed housing development would surely choke the Saddleworth Road / Stainland Road junction as well as contributing significantly to air pollution at peak times. Pollution. As well as the predictable commuter traffic, Saddleworth Road is used by a significant amount of HGV traffic serving businesses whose only reasonable access is Saddleworth Road. Already, this combined traffic is a health risk to children attending Greetland Primary School on Saddleworth Road. The plan would potentially create such an increase in traffic as to see it queuing up Saddleworth Road as far as the school. The children are at increased risk here since the most damaging pollutants are heavier than air and occupy the same space as the children themselves. This will still be the case when IC engines give way to electric vehicles since there is still significant pollution from friction braking systems and tyre wear. Infrastructure. Current provision is unlikely to meet proposed demand. Transport, Medical, Dentists, Schools, Leisure. Has the Council assessed these requirements or ensured that some other authority will do? Choice of sites Greetland has been chosen for development ahead of available and potential brownfield sites closer to town centres. If affordable housing is even part of any proposal, surely the people who would most likely occupy it would also benefit from affordable access to amenities and not have to travel longer distances at greater expense. Green Belt and Wildlife. The proposed development is of Green Belt land, whose designation has as much relevance and purpose now as it did when first instituted. In this valley it provides a perfect introduction to nature, and is a perfect jumping off point for all the people of Greetland and its environs (especially children), for further investigation and understanding of issues such as cycles of life and climate change. This facility is on the doorstep and only a short distance from other population centres. No doubt the Council will have taken steps to be sure that it is behaving legally in the formulation of its plan, and I trust that this is the case. But surely very purpose of its existence is to look after, promote and nurture the lives of its population ; its electors, and it is in this sense that I am of the view that the plan is not legally compliant. Whilst it may be technically legal, the plan

is not providing the best overall service to the residents of the HX area of Calderdale.

Do you consider the plan to be Sound?: **No**

Sound Reason:

I consider that the plan as it relates to Greetland to be ill-founded for the above reasons. In addition the scale of the development is greatly in excess of anything that the local infrastructure can take.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

The Council has not made sufficient effort to publicise their purpose, their meetings, their research, or their reasons. They have not allowed time for decisions to be absorbed before following steps needed to be taken. The council has not shown how it has investigated potential use of Brown site for housing use.

Suggested Modifications:

The sites LP0026, LP0952, LP0177, and LP1625 in the Greetland area should be removed from the development plan.

Comments:

Additional Evidence Link:

Comment ID **HRU1295** Site ref (if applicable): **LP0026**

Person ID: **1243958** Name: **Mr Anthony Hindle** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

To build on this site would be absolutely nonsensical because the site is prone to flooding as has been highlighted recently.it would be wrong to expect people(who may not be aware of flooding) to buy houses here and they are unlikely to obtain insurance. Other concerns are that should they be built, the increased pollution in the surrounding area would be catastrophic, particularly with an infant school nearby. The infrastructure is not in place to accommodate any more housing. There is already a long waiting list at the local doctor practice, also the schools. The current situation at West Vale junctions would mean hundreds more vehicles and the traffic would be at a permanent standstill.thisi already exacerbated when the nearby motorway is closed and extra vehicles forced to travel through the village. The effect on the local wildlife would also be catastrophic.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1296** Site ref (if applicable):

Person ID: **1243943** Name: **Mrs Lucy Barrett** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

The process to object is neither easy or straight forward and the online forms and documents presented are complicated, lack clarity and make it challenging and off-putting to object.I feel that insufficient time has been allowed for full consideration of all the documents which need to be read to understand this issue fully and for objections to be made. In the CC37 considered and rejected report November 2019 - it appears that the main difference with those sites rejected and the sites LP0026, LP0177, LP0952 and LP1625 which were accepted were that they didn't have a developer on board! I feel very strongly that because there is a local developer on board is the key factor on whether a particular location was included in the Local Plan.I note that in the Consultation comments there are already a set of plans from Barratt Homes for site LP0177.The interest and profits of prospective developers should not be a reason at all (never mind a key reason) for a site being included or excluded from the plan. I believe by splitting LP0026, LP0177, LP0952 and LP1625 as separate plans the full picture is being concealed, all sites are in close proximity of each other and can only be evaluated properly if considered as a whole

Do you consider the plan to be Sound?: **No**

Sound Reason:

Loss of Greenbelt I have lived in Greetland for 20 years, I have always owned and a dog, therefore always used the public footpaths on all the sites in the proposed development plans.It is important to have this safe space to exercise for physical and mental wellbeing walking down Saddleworth Road with the heavy lorries hurtling down does not give you the same benefit as walking along side the river witnessing the heron and seeing my dog run through the fields and woods. The Duke of Edinburgh groups use these public rights of way as part of their expedition practices.To take away these footpaths is to deny our young people the opportunity to enjoy the countryside and open air whilst undertaking physical activity in a natural and safe environment, away from traffic, crime and pollution. To allow these developments would be to create urban sprawl, gradually encroaching on precious greenbelt Land that our community relies on for our wellbeing. There are many other sites, including disused mills, within the Calderdale catchment that do not sit within Greenbelt Land that could be considered for development before ruining for ever the Greenbelt Land in these sites. Increased risk of flooding I live at Sunnybank Lane and even the smallest amount of rain sends a torrent of water running down our lane. The effects of the flooding in Dec 2015 and more recently from storm Ciara are clear to see, the pictures and videos all over social media for anybody to review. Greetland is a high risk flood area within Calderdale. There are natural springs that pop up all over the hillsides of Greetland and added to this vast amounts of rainfall certifies the high risk flood area. We need theGreenbelt Land within these proposed development sites to act as a natural soak away and flood defence.Losing these flood plains would cause the water to simply be diverted elsewhere, causing

certain flooding further down the area. The natural flood plains are natures own defence mechanism why oh why would you take these away? The frequency of flooding is only set to increase with the change in weather conditions we are experiencing through global warming.The natural flood plains are therefore becoming increasingly important to our communities. To build on these sites would not only guarantee flooding issues and untold misery for residents and local businesses but cause increased expenditure for the council and local authorities as they will be required to assist with clean up operations, as has been seen over the last week or so in many parts of Calderdale. Loss of wildlife habitats There is an abundance of wild deer running through the fields, I witness the deer every time I walk my dog on the footpaths of the proposed sites. Along with the deer we have the beautiful kingfisher, heron, squirrels, pheasants, badgers, bats and foxes in the area. Building on the land would remove the habitats of this wildlife, therefore the wildlife would disappear. It saddens me to think my children would no longer witness nature in their community. Lack of infrastructure Greetland Academy is already full. The dentist in West Vale is full for NHS patients. The GP surgery often can't accommodate appointments. Adding an additional 600+ houses is just beyond belief on how the aforementioned will cope The local roads are already riddled with potholes and are constantly patched. They are constantly under repair as the local drainage system is ineffective and causes regular surface issues.Add to that a level of increased traffic caused by the development as proposed and the road conditions will be worsened even further. Traffic congestion, air pollution and noise pollution Greetland and West Vale already suffer chronic traffic congestion, with the roads used not only by locals but also by the large wagons travelling to and from the Bosch Industrial Estate and the Sonoco factory.In addition, the road is used as a cut through from Ripponden and the M62.The village is already at breaking point at peak times and the roads cannot cope with the existing volume of traffic, let alone adding to that with these proposed developments. If you have a journey to Elland you need to allow yourself and additional 10 mins to travel through Greetland and West Vale. Living at Sunnybank I see the traffic congestion at school drop off times. Saddleworth Road becomes a single lane road due to the parked cars on both sides.It becomes an obstacle course to get through and the large lorries that frequent the area make it dangerous for road users and pedestrians. Already the congestion is waiting to causing and accident and the safety of families is at risk. 600+ houses equating to on average 2 cars per family, this would be trulyengulfingfor the local roads. By increasing the congestion in the area, the air pollution will by default increase.This will especially have enormous impact on the young children attending the schools in the area. The playground of Sunnybank Pre-school runsadjacentwith Saddleworth Road the children aged between 2 -3 would be playing out and being intoxicated with fumes from the number of passing vehicles. Additionally there would be an automatic increase of the level of noise pollution in the area.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5609756

Comment ID **HRU1302** Site ref (if applicable): **LP0026**

Person ID: **1243963** Name: **Mr Andrew Tweedale** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Please see the attached document titled "LP0026 - Main Points of Objection"

Do you consider the plan to be Sound?: **No**

Sound Reason:

Please see the attached document titled "LP0026 - Main Points of Objection"

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Please see the attached document titled "LP0026 - Main Points of Objection"

Suggested Modifications:

N/A

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5609760

Comment ID **HRU1311** Site ref (if applicable): **LP0026**

Person ID: **1243964** Name: **Miss Sarah Wilby** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Please find the attached document titled "LP0026 Main Points of Objection"

Do you consider the plan to be Sound?: **No**

Sound Reason:

Please find the attached document titled "LP0026 Main Points of Objection"

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Please find the attached document titled "LP0026 Main Points of Objection"

Suggested Modifications:

N/A

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5609766

Comment ID **HRU1322** Site ref (if applicable):

Person ID: **1243837** Name: **Mr Graham Newton** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

It does not address the NPPF guidelines for the following reasons Flooding, although not at the side of the Black brook many springs run down the hillside, the land here absorbs water releasing it slowly, development of the site would substantially increase surface runoff and would therefore increase the flow of water in the Black brook and would consequently increase the danger of flooding in West Vale. The site is Green Belt designated not just Greenfield, as such it maintains the Greetland community as an entity. It is presently low grade farm land and as such forms a valuable feeding ground for mixed finch flock in winter. The site will have to exit onto Saddleworth Road which ends up at the very congested West Vale traffic lights. Up to quarter of a mile stationary queues already form here and increased traffic will increase these possibly as far as the infant school. Stationary traffic will increase pollution and reduce air quality close to the school playground. The school is full as is the local doctor Surgery and therefor the infrastructure cannot absorb this development.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Not complying with guidelines.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Poorly advertised, most found out by word of mouth so have had little time to resond.

Suggested Modifications:

This site should be removed.

Comments:

Additional Evidence Link:

Comment ID **HRU1323** Site ref (if applicable): **LP0026**

Person ID: **1243969** Name: **Mrs Sandra Reid** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

The plans for LP0026 along with LP0952, LP0177 and LP1625 all cover valuable Greenbelt land in Greetland. The land provides a home to a lot of wildlife. We live in a world where we are encouraged to save animals and their natural environments, I don't believe taking away their home is in any way doing this. This land helps to reduce the flood potential in not only our area but for those downstream of us. The CMBC Flood strategy followed the Boxing Day floods of 2015. Calderdale was the worst affected borough in the UK. Greetland saw localised flooding all along the flood plain (sites LP0952 and LP0177) and the Black Brook. The houses on Woodfield Drive were affected. Multiple sites in West Vale were affected and further downstream the Elland Bridge collapsed and with that a Â£4 million repair bill. Building on this Greenbelt land will only lead to worse flash flooding as this land helps slow the flow of water to the main watercourses. Throughout Calderdale areas are struggling to find solutions to regular flooding problems, when we have land like this naturally doing its job by helping to prevent this, where is the sense in building on it? Current legislation on building on flood risk areas can be found here: http://www.environmentlaw.org.uk/rte.asp?id=105 This contains the following quote 'new development in the flood risk areas would only be allowed when it is exceptionally necessary' I find it very hard to believe it can possibly be deemed 'exceptionally necessary' for this level of building work in small village. The risks of further flooding as mentioned alone should be enough to rule it out. One of the advantages of Greenbelt land is to reduce amounts of urban sprawl. How will building on this land effect this? I can understand and welcome development in the area, but to a limit which this plan far exceeds. Where are these extra households going to do their shopping? What provisions will be made for things such as doctors' appointments? Dentist appointments? When will the building stop if there are more people needing more services that we currently don't have? I fear it will only lead to further building and developments in the area in the long run. The roads in Greetland currently struggle with the amount of traffic they take. Living on Sunnybank Road we see the daily battle at peak school drop off/pick up times. With so many homes being built the schools will have to expand but what about our roads? How will they cope with the extra traffic? Not only are our roads not suitable for this, the long delays this will cause will lead to much more air pollution with standing traffic. West vale is already chaotic with the amount of traffic at the best of times, this plan will lead to even more traffic wanting to go through, and the already long queues will grow. Many people have chosen to live in Greetland to benefit from its beautiful surroundings and to have the chance to be able to enjoy the surroundings and its nature in their leisure time. This contributes not only to our community's physical but also mental well-being. Taking away this opportunity will have an effect on the health and quality of life of those who enjoy it regularly.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1332** Site ref (if applicable): **LP0026**

Person ID: **1243838** Name: **Mr John O'Hara** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

The consultation has not properly been publicised. The portal has, for periods, been inaccessible. The Greetland plots are placed under the 'Elland' allocations which confuses users. All local councillors have not had a vote on these new site allocations. These sites have only been voted upon by cabinet.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Negatively prepared: Turley's/ Calderdale's projections are flawed and based on inappropriate data. Unjustified: The council should be using Brownfield sites. There is no justification for it using Green Belt land. Ineffective: This plan is ineffective. More sites in neighbouring Kirklees could be used. Inconsistent with national policy: The NPPF has largely been ignored. Economic Need Turley's report of August 2019 'Modelling the Economic Implications of the Proposed Housing Requirement' is unrealistically based on Calderdale experiencing net migration which is above the historical average. Net migration is falling post the Brexit referendum (see www.migrationwatchuk.org/statistics-net-migration-statistics) and the Government is altering (tightening) the immigration rules. EU free movement of people will stop in December 2020. There will not be enough workers to fill the homes that Calderdale wants to build. Calderdale need to go back to the drawing board with their economic projections. the 2014 data used in Turley's report is very outdated. Flooding This site floods, see the attached photo. This site soaks up and stores rainfall and slows down the surface flow rate into the Black Brook, the land as it is assists with flood management already see NPPF paragraph 155. Using this land will increase flooding elsewhere and contravenes NPPF 163. The Black Brook flows into the River Calder. The Calder Valley regularly floods already. Elland Bridge had to be rebuilt following the boxing day 2015 floods and was closed for 12 months costing millions to repair. In February 2020 a shipping container was washed from West Vale and became lodged under the bridge. Building on this site will increase the regularity and severity of flooding. Mitigation will not work as has already been demonstrated in neighbouring Mytholmroyd where cÂ£40M has been spent on flood mitigation without success. This site slopes onto Saddleworth Road, one of only two arterial roads which run through Greetland and building on it will cause the road to flood. Infrastructure The roads are inadequate and mitigation is very unlikely to work given that there is no space at West Vale, Barkisland, Ripponden or Stainland to widen the roads. The traffic lights at West Vale are dealing with traffic movements in excess of their operating capacity. Green Belt The NPPF chapter 13 has been ignored by the council. Building on Green Belt should only occur in exceptional circumstances. These circumstances are not exceptional. There are lots of Brownfield sites that could be used for new housing in Calderdale. Halifax itself is a former Mill Town with high densities of Brownfield sites. Dwelling densities could be increased on other sites e.g. Brighouse see NPPF 122 & 123 This proposal will create urban sprawl and West Vale, Greetland and Barkisland will begin to merge into one another. Open space will be lost. NPPF Chapter 11 has also been ignored in that the Council has failed to identify more suitable sites. The council has been lazy and has not positively prepared this local plan. Wildlife The land is part of a wildlife corridor. Native birds, animals and insects will suffer if the land is built on. Pollution/traffic management/i nfrastructure Each new household will have at least one car, probably more. There will be increased air pollution from increased traffic. Chapter 9 of the NPPF is not being followed. The roads all lead to neighbouring villages being West Vale, Barkisland, Ripponden and Stainland which are already bottlenecks for traffic.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

The council has not cooperated with all neighbouring councils.

Suggested Modifications:

The council should 1. remove sites LP0952, LP0177,LP0026,LP1625 from this plan. 2. Reconsider economic its projections. 3. List each and every brownfield site and advise why they are not suitable for development. increase Dwelling densities elsewhere to save the Green Belt.

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5609770

Comment ID **HRU1350** Site ref (if applicable): **LP0026**

Person ID: **1243840** Name: **Mr James O'Hara** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

The consultation process has not been adequately publicised and the portal itself is too difficult to navigate.

Do you consider the plan to be Sound?: **No**

Sound Reason:

The plan contravenes the NPPF: Economics The plan is based on flawed economics. The report that the Council relies upon from Turley ' Modelling the Economic Implications of the Proposed Housing Requirement' is based on 2014 data which pre dates Brexit and is very unreliable. Net migration to the UK is falling see: www.migrationwatchuk.org/statistics-net-migration-statistics. Whereas Turley project that migration to Calderdale will be above historical averages. This is not true and is not supported by any evidence. There is a shortage of working age people nationally and locally. The free movement of people within the EU block will end in December 2020 and immigration rules are to get tighter. Low skilled workers will not get visas see The Times 20/02/2020 and the comments of the Home Secretary, Priti Patel. There will not be enough people to live in all the homes Calderdale Council wishes to plan for. Flooding This site Floods, see the attached photograph. In addition this site soaks up rainfall and slows down the transit of water to the nearby Black Brook (river). The council has not adhered to NPPF 155 or NPPF 163when including this site in the Local Plan. Building on this site will cause Saddleworth Road to flood and it will endanger West Vale, Elland and Brighouse. The risks cannot be mitigated against with cash expenditure, or at all, and lessons need to be learned from the floods in neighbouring Mytholmroyd where the Environment Agency has spent (some may say wasted) Â£millions on flood defences and mitigation plans which do not work. This land is not suitable for development. The DEFRA secretary, George Eustice MP, said on BBC Radio 5L on 17/02/2020 at 08:07 ' We do have to think about how me manage water catchments upstream and that's why we're committing Â£4bn over the next 5 years and we are very keen to look at nature based solutions so natural dams, slowing water courses down using natural flood plains so that we don't have the water getting down into our urban areas in the first place.' Listen to the message from Westminster, the land in question should not be built upon. Green Belt. The site is a beautiful

example of Green Belt land. it naturally breaks up urban sprawl. Calderdale council has not adhered to NPPF Chapter 13 and has not demonstrated why a suburb of a former industrial town need to be used for housing when there are sufficient numbers of Brownfield sites to meet any housing need. Brownfield sites in Calderdale are predominantly in urban areas so using them would reduce the transportation burden on outlying settlements. See chapter 9 NPPF. I have not seen a Brownfield Site Register per NPPF para 119 and assume that this council does not keep one. Housing densities The housing densities at the Brighouse sites could easily be increased to absorb much of the housing requirement involving the Green Belt Land in Greetland. See NPPF paras 122 & 123. Wildlife The site is home to bats, deer, foxes insects and other invertebrates. it is vital habitat that should be protected. Infrastructure the roads cannot cope with the existing traffic and new development will make an already bad situation worse. Sustainability The sustainability appraisal for this site includes to many 'uncertain' conclusions. The outcome of building on this site cannot therefore be deemed as positive. the plan is unsustainable.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Where are the strategy report involving all neighbouring councils? I have seen just one which involves Kirklees Council but nothing involving Bradford, Oldham, Rochdale.

Suggested Modifications:

Remove LP0952, LP0026, LP0177 & LP1625 from the local plan. Scrap the economic projections. increase housing densities at Brighouse allocation sites per NPPF paras 122 & 123

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5609702

Comment ID **HRU1368** Site ref (if applicable): **LP0026**

Person ID: **1243978** Name: **Mr Denis Reid** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Plans LP0026 along with LP0177, LP1625 and LP0952 together cover a massive stretch of naturally beautiful land in our local community. This land is classified as a 'most sensitive' greenbelt, please find evidence of this in the following link to the Councils Greenbelt Review: https://calderdale.gov.uk/v2/maps/green-belt-review?fbclid=IwAR0-YtEHRsU5_gSN2JMA4zPU97P0GPsWU0_Iq263NGHjCx4_m66ibHv8vaQ How can it be justified to be building on this sensitive land that provides a home to so much wildlife, prevents and protects local areas from flooding and also provides us with a public right of way? Many people use this land for leisure purposes to get out into nature and walk. Building here will take away this opportunity for many and therefore have a direct impact on the communities physical and mental health. The plans outline for a

number of homes (approx.. 600 over the 4 mentioned sites) to be built on this land. We are a relatively small village as we stand and the prospect of adding these kind of numbers will cripple our already struggling services. Where are these people going to register for doctors' appointments? NHS Dental appointments? Many in the local area already struggle with waiting times for these services and this plan will lead to this worsening. With people being unable to get these doctors appointments this will lead directly to increased hospital admissions putting a strain on the NHS. The local roads in the area already struggle with the amount of traffic going through the village and ending up at a standstill in Westvale. These plans will put a further 600+ cars on our roads. These roads will not physically cope with that much traffic. It will also lead to long delays coming and going from the area which will see the air pollution rise especially around our local schools leading to further health issues for our communities' residents. The school pick/drop off time at the school on Saddleworth road is already chaotic at the best of times, how are we going to deal with even more people needing to be there at the same time? On a number of recent occasions, the local area has seen frequent flash flooding. These sites work as a natural flood defence for our area and also help to prevent flooding to areas down stream of us. The last few years have shown us that these incidents are occurring more and more often, do we really want to build on land that is naturally doing it's job to protect us? Throughout Calderdale a number of areas such as Sowerby Bridge and Hebden Bridge are currently having the spend millions on the clean up from floods and trying to fund prevention for future flooding. With that in mind, why would we want to add further problems to the area when we are already struggling? I can appreciate the need for some development to areas where more housing is required, but this amount of new homes in a small village like ours can not be justified. It will change the entire landscape of the village and have a direct negative impact on the quality of life for many.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1370** Site ref (if applicable): **LP0026**

Person ID: **1243839** Name: **Mrs Frances O'Hara** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

The sustainability appraisals for the proposed sites are not fit for purpose.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Sustainability The updated Sustainability Appraisal for this site refers to 17 objectives which are scored on a traffic light system from Positive (green) Uncertain (yellow) Negative (red). Of the 17 indicative

objectives 1 is n/A, just 5 are marked Green, 1 is Red and 9 are yellow. The report has not been prepared properly and is misleading for example Objective 11: TO PROTECT AND ENHANCE THE NATURAL, SEMI NATURAL AND MAN MADE LANDSCAPE is marked as 'positive' yet the land the green belt. how on earth can building on this site enhance the natural, semi natural and man made landscape? taking away Greenbelt is by it's very nature harmful to the environment. Plainly not enough analysis of the sites has been carried out. The answer to any planning question should not be 'uncertain'. Calderdale Council should 'follow' the question until they find an answer be it negative or positive, they should not stop at uncertain. That is not best planning practice and is unacceptable. How does this demonstrate that there are exceptional circumstances to use this Green Belt land per Chapter 13 NPPF? It simply does not. Flooding This site floods already (photo attached), building on it will increasse the frequency and severity of flooding at this site and will also increase flooding elsewhere. This is against the NPPF paras 155 & 163. The Calder Valley is at a unique risk of flooding (as said by the Environment Agency), this is recognised by government and there have been significant floods within the last 8 years, the most recent being as a result of storms Ciara and Dennis in February 2020. The risk cannot be mitigated. Tens of millions of pounds have been spent in the Upper Calder Valley and still Hebden Bridge, Mytholmroyd and Sowerby Bridge experience regular devastating flooding. The Black Brook flows at the bottom of this site and feeds into the River Calder. To build on this site would be to knowingly increase the regularity of floods in West Vale, Elland, Brighouse and beyond. There would be: * Increased surface water runoff * Reduced peak rainfall/peak flow lag times * Loss of natural water storage * Loss of flood plains *Increased transit speeds of rainfall *Increased peak flow volumes * More frequent flooding Economy The housing 'need' advised within the local plan is based on flawed economics. Firstly the migration projections within Turley's report for Calderdale Council: 'Modelling the Economic Implications of the Proposed Housing Requirement' pre date Brexit and its potential effects on trade, interest rates, inflation and crucially migration. There is a shortage of working age people nationally, in Yorkshire and in Calderdale, even if these homes are built there will not be enough 'workers' to fill them. The council was given the option by the Inspector of revising down its economic projections but instead chose to maintain them and allocate more housing to Green Belt sites. The very fact that Calderdale Council could not calculate its housing need based on its own projections first time around highlights how unsound their methodology is. Recent figures confirm that net migration is falling. This has been the case since 2015. Visit: www.migrationwatchuk.org/statistics-net-migration-statistics Section 3.8 of Turley's report relies on higher rates of net migration than the historic average, this is unrealistic. The government is to introduce a points based immigration system and we are told that unskilled workers will not get visas: Priti Patel in the Times 20/02/2020. The extant population is having fewer children and birth rates are declining. The housing need as projected by Calderdale does not exist, there are not enough workers. The household formation projections in Turley's analysis are based on 2014 data which is before the Brexit referendum was even contemplated. The UK has now left the E.U. so the data is unreliable. The 2016 data is, by HM Governments own admission unreliable. It is difficult to understand why older data from a different political era is reliable. Green Belt Chapter 13 of the NPPF promotes the green belt. Calderdale Council has simply ignored the NPPF, it has not demonstrated that it is seeking to use as much Brownfield Sites as possible. Halifax is a former industrial town it is littered with Brownfield Sites which could be utilised for housing. The council has not demonstrated 'exceptional circumstances' so as to even consider using Green Belt land nor has it kept a Brownfield Site Register per NPPF para 119. Housing Densities The council could comfortably increase housing densities (NPPF paras 122 & 123) on other allocated sites and this this would protect this site. The housing densities should be increased elsewhere e.g. Brighouse sites. It is unsustainable not to increase densities elsewhere Climate Emergency Calderdale Council has declared a 'Climate Emergency' yet wants to use Green Belt land for housing. The two concepts are mutually exclusive of one another. Green Belt Land stores CO2 and oxygenates the atmosphere. Ecology/Wildlife This site is part of a Wildlife Corridor and if it is built on there will be loss of habitat for hundreds of species of animals and insects but most strikingly loss of habitat for bats, owls, deer, bagder, fox, hawks etc etc Infrastructure The local schools will not cope with extra headcount in the locality. There are not enough doctors, dentists, etc. The roads are clogged up as it is.

Again see the sustainability reports, this is a rural site, the residents will be driving, they will not be using public transport.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

The council should have cooperated with neighbouring councils.

Suggested Modifications:

Remove LP0026,LP0952,LP0177 & LP1625 from the Local plan. Liaise with other authorities to take calderdale's additional (highly questionable) housing need so as to prevent flooding in Calderdale. Prepare post Brexit economic forecast. Increase housing densities in Brighouse to save Greetland Green Belt at the four locations/sites listed.

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5609732

Comment ID **HRU1379** Site ref (if applicable): **LP026**

Person ID: **1243971** Name: **Mr Steve Hannah** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

The Local Plan does not address the implications of the National Planning Policy Framework, especially, NPPF Para 177 and the associated PPG in the Sustainability of Greenbelt Sites. According to the NPPF Para 143 under 'Proposals affecting the Green Belt' it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' The very special circumstances do not apply. Other reasons not legally compliant. Residents of Greetland not made aware of proposal and given opportunity to comment. The other reasons cited for excluding sites such as Green Belt, Access, Wildlife issues, Flooding constraints all apply to sites LP0026, LP0177, LP0952 and LP1625 and therefore these sites should equally be rejected from the Local plan. Importantly, I would also comment that plans LP0026 (The Gate Farm), LP0177 (Land adjacent Ellistones Place), LP0952 (Land at New Gate Farm) and LP1625 (Land to the west of Silverdale Terrace) should not be considered as separate proposals.They are so interrelated (sited within a small 1 km area along Saddleworth Road) that they can only be assessed fairly if considered as a whole.By splitting them out as separate plans the full picture is being concealed. My comments therefore are relevant to each of the plans LP0026, LP0177, LP0952 and LP1625 and should be considered as equal objections to all four sites.

Do you consider the plan to be Sound?: **No**

Sound Reason:

My main points of objection are as follows: Loss of Greenbelt land Increased risk of flooding Loss of Wildlife Habitats Lack of Infrastructure Traffic congestion, Increased air pollution Loss of Greenbelt Land Loss of amenity Loss of public footpath routes Creation of urban sprawl, Loss of wildlife habitat - foxes, badgers, bats, rabbits, deer exist within proposed development sites and adjacent areas The NPPF at a

para 133 states that -“ The Government attaches great importance to Green Belts "and at para 136 that - “Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified"At para 144 it further states -“ local planning authorities should ensure that substantial weight is given to any harm to the green belt"and at para 145 -“ a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt "Building on these sites is contradictory to all of these statements. When each of the 4 sites are reviewed together a large and disproportionate area of open space would be lost to this small community. At para 137 the NPPF states ' Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. '.I do not agree that the authority in this case has satisfied these conditions.There are many other sites, including disused mills, within the Calderdale catchment that do not sit within Greenbelt Land that could be considered for development before ruining for ever the Greenbelt Land in these sites. Increased risk of flooding Para 155 of the NPPF states that ' Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas of highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere ' Losing the fields will reduce the potential for water to be slowed down before it enters the river. Run off will increase and the rate water reaches the river/flood plain will increase therefore increase the frequency and severity of flood (which it already does) ; see images attached. Loss of Wildlife Habitats Para 177 NPPF states that ' The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site'. I would argue that building on the land which is included in these proposals will be extremely detrimental to the wild animals within the area.No mitigation can prevent the impact of urban sprawl and the destruction of their natural habitats. Lack of Infrastructure The local schools are already full.The local dentists have long NHS waiting lists.The GP surgery is full and often can't accommodate appointment requests.Adding an additional 600+ houses and the associated increase in residents is simply unsustainable. The existing drain system cannot cope with rain water at present and raw sewage is regularly seen entering fields and the Black Brook stream when it rains. The sewers also regularly contaminate the footpath which runs along side the footpath below the proposed development sites. Traffic congestion, air pollution and noise pollution Greetland and West Vale already suffer chronic traffic congestion, The village is already at breaking point at peak times and the roads cannot cope with the existing volume of traffic, let alone adding to that with these proposed developments. At school drop off times Saddleworth Road becomes a single lane road due to the parked cars on both sides.It becomes an obstacle course to get through and the large lorries that frequent the area make it dangerous for road users and pedestrians. I fear for the lives of the children trying to get to school daily.. Increased air pollution More houses, more people, more cars = more air pollution. Less flora to with the loss of fields/trees further compounds the negative impact of increase emissions/pollution.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

retain greenbelt and do not develop on it

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5609777

Comment ID **HRU1384** Site ref (if applicable): **LP0026**

Person ID: **1128683** Name: **Mr Ryan O'Hara** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

The sustainability reports for the sites are not specific enough. The consultation has not been publicised.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Housing need within the Local Plan The council calculates a housing need based on unsound economic arguments. The council commissioned a report from Turley called: Modelling the Economic Implications of the Proposed Housing Requirement The report relies on data from 2014 to argue that there will be more jobs in Calderdale in the next 15 years, thus more workers therefore we need more homes. The analysis relies on Calderdale experiencing migration in excess of historical averages. This is unrealistic because the UK has now left the EU and free movement of people is to end, in any case, net migration is falling and has been since 2015 (see : www.migrationwatchuk.org/statistics-net-migration-statistics) The statistics used by Turley rely on the UK being an EU member state. The reality is that birth rates are falling, retirees are increasing in number and net migration is falling. It is unsound to base an economic requirement for housing on data which is obsolete and still the only way that Turley can justify the housing need is to argue that Calderdale will somehow experience migration levels above the historical average. It is unrealistic. The housing need is overstated dramatically. The number of homes in the Local Plan is unjustified. Sustainability The sustainability appraisal for this site raises more questions than it answers. The report has not been positively prepared as a result. Of the 17 Objectives listed in the site appraisal 10 are 'uncertain', 1 is negative and just 5 positive. (1 is n/a) The council can only list 5 positive reasons for building on this Green Belt land - that is not good enough. The land should not be built upon. The report is misleading Objective 7 TO REDUCE THE RISK OF FLOODING AND RESULTING DETRIMENTAL EFFECTS ON PEOPLE AND PROPERTY is marked as uncertain. This is simply not the case, this land floods and I attach a photo of the land being flooded. The site appraisal is not fit for purpose and is misleading. It is not sustainable to build on Green Belt land. Permitting the inclusion of Green Belt within this plan will set a precedent for future plans where more Green belt will be lost. Building on Green Belt is the easy option, it is attractive to developers and it makes the most profit. However it is the most damaging to the environment and the communities in which we live. Chapter 13 of the NPPF sets out the policy for protecting the Green Belt and Calderdale council simply has not adhered to it. Flooding This site floods, see attached photo. According to the Environment Agency the Calder Valley is 'at unique risk of flooding'. The risks cannot be mitigated against, the only mitigation is to build housing which is not on steep sided valleys and which is away from water courses. This site is on the side of a valley. Building on it will cause Saddleworth road to flood. This site acts as a natural water store when it rains, it slows down the transit of water into the Black Brook which flows at the bottom of the site. If this site is used it will ensure that West Vale, Elland and Brighouse experience more frequent and more severe flooding. Using this site is against NPPF paras 155 & 163. If this land is developed it will put lives in danger. The DEFRA secretary, George Eustice MP, has this week confirmed that natural flood management measure should be retained. Building on this land will destroy natural water management features. Green Belt Using this land is against the aims of Chapter 13 of the NPPF. There are not exceptional circumstances to allow this valuable green belt to be used for building. The land stops urban sprawl and is a recognised wildlife corridor. Climate Emergency Calderdale Council

has declared a 'climate emergency' yet wants to build on green belt sites away from towns and public transport. The grassland absorbs and stores CO2. Anyone who lives on the site will need a car to get around in. This is short-sighted planning and will exacerbate the climate emergency Brownfield Sites Halifax is a former Mill Town with an abundance of Brownfield sites suitable for housing. The council has not produced a Brownfield Register contrary to NPF para 119. Housing Densities The pre-existing Local plan sites can accommodate increased housing densities and increasing the densities in Brighouse for example, would protect LP0952, LP0026, LP0177 & LP1625. Infrastructure There is already heavy congestion in the villages of West Vale, Barkisland, Stainland and Ripponden. This site is in a rural location and residents will be reliant on cars. Chapter 9 of the NPPF has not been followed when considering this location. Fore example NPPF para 102(c) has not been followed, this site will not promote the use of cycling or walking. Wildlife Loss of habitat for a protected species cannot be mitigated against.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

The council should cooperate will ALL neighbouring authorities.

Suggested Modifications:

Remove LP0026,LP0952,LP0177 & LP1625 from the Calderdale Local plan. Increase housing densities in Brighouse. Obtain an econmic forecast baed on the realities of the current migration numbers, the proposed immigration rules and the fact that the UK is no longer an EU member state.

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5609783 ; http://calderdale-consult.objective.co.uk/file/5609735

Comment ID **HRU1387** Site ref (if applicable): **LP0026**

Person ID: **1243814** Name: **Mrs Jennifer Sumner** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

It is not legally compliant as the process of community involvement was not fulfilled. I don't feel much effort has been given to involve the community as you can see many people found out through other means, ie social media!

Do you consider the plan to be Sound?: **No**

Sound Reason:

The plan does not deliver sustainable development in accordance with the policies in the NPPF. Points of objections: Air pollution and Traffic: Saddleworth Road already generates a lot of traffic from surrounding areas and from the motorway where lorries choose this route and speed through to avoid busy queues in Sowerby Bridge! Adding more homes, possibly 600 new homes, will generate at least 2 cars per home, that's 1200 more cars polluting the air!! The pollution will increase hugely and with a school on that stretch into West Vale, will have a huge effect on health and well-being of our children and future generations.

Flooding: The south side of Saddleworth Rd already takes a lot of the build up of rainwater and springs. Building 600 homes will have huge effect on the lower valley and West Vale, the drainage would not cope. Due to recent bad weather photo/video evidence clearly proves building on these sites would have a catastrophic effect on those plains and surrounding areas, such as West Vale. The NPPF report advises that any flood plains should not be built on. Infrastructure: Why isn't the council considering other Brownfield sites which are better positioned around Calderdale? Greetland is a village not a town, there is one dentist, one school and one doctors surgery. All these are currently full to capacity. Are there plans to create additional schools etc? Wildlife: The wildlife in and around Greetland is very special and should be protected: such as deer, herons, pheasants to mention a few! Greetland is a wildlife corridor and many people from the community and beyond follow pathways and bridleways for physical exercise and well being! Once building on these sites has happened we will never get that back.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Remove this site from the plans and ensure Brownfield sites are considered instead.

Comments:

Additional Evidence Link:

Comment ID **HRU1393** Site ref (if applicable): **LP0026**

Person ID: **1243972** Name: **Miss Stephanie Ashton** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Questions concerning the figures surrounding the housing requirement Inadequate sustainability appraisal Removal of open green space Lack of supporting infrastructure Air Pollution not assessed, therefore unknown Lack of traffic plan and operational assessment of local road network Disproportionate amount of development

Do you consider the plan to be Sound?: **No**

Sound Reason:

The Objectively Assessed Need for housing that the council relies on to make population predictions is based on out of date information, and therefore must be questioned. In addition to this, the council's estimations for annual job growth assumes that Calderdale will experience rapid and constant growth. This is not realistic and has the effect of raising the housing requirement in such a way that it becomes harmful and unsustainable. In 2016 the WYCA (West Yorkshire Combined Authority) published its Strategic Economic Plan to cover employment growth for the Leeds City region to cover the period up to 2036. They estimated 35,700 net additional jobs in that time. In part, it is these figures that Calderdale have based their projected employment growth on, however, the Leeds City region has produced below average employment over the past 30 years but in their Strategic Economic Plan they envisage well above average

growthin the next 15 years. This is extremely optimistic given that the current unemployment rate in Yorkshire is 4.3% which is the second highest of any region in the UK and is currently increasing. In their economic projections, Calderdale are hoping that the 'Northern Powerhouse' (which doesn't actually exist except on paper) and HS2 (although how?) will generate historically unprecedented rates of employment growth. This forecast means that Calderdale will miraculously go from below average employment growth to significantly above average growth. Calderdale need to revisit their economic forecast which is based on the assumption that our economy will grow because of the effect of the Northern Powerhouse which is not evidenced in any way. And because they have over-egged the economic growth, Calderdale need to find more land to build on. If their economic growth was more realistic, there would be no need to build the extra houses. For this reason I argue that there is no exceptional circumstances to release this Most Sensitive Green Belt land. There is no mention of road traffic constraints at the West Vale traffic lights. However, as someone who lives in the area, I am obliged to inform the inspector that the level of congestion at the traffic lights has backed up as far back as the primary school at times. This is a considerable level of congestion, one that is currently unmanaged, and that is before an additional 600 homes are allowed to increase the level of traffic. We could face between two to four extra cars on the road, per house, considering that each home will likely have two persons traveling to work, some as many as four if the homes house a younger generation of workers still living with parents. In our home, we have four people all driving cars to and from work. This isn't just a high number I am making up; the situation is the same with many of my friends too. I mention this point because it is of genuine concern to me, the traffic is terribly backed up behind the West Vale traffic lights, and there is no mention of air pollution being monitored in this area. This directly effects the local primary school, situated on Saddleworth Road. As a primary school teacher, myself, the thought of such an increase in traffic on Saddleworth Road terrifies me. The school children will be put at an unacceptably higher risk, both from road traffic accidents and air pollution. To pass any development on this road, due to the impact it will have on vulnerable children, without proper testing and assessment is not right. As a teacher, I am concern with child development, even without testing and assessment it is not an unjustifiable statement to say that the levels of air pollution on this road, which such an increase in traffic, will dramatically increase air pollution. The harm caused by air pollution will further increase due to the way in which Saddleworth road is set in the bottom of the valley and is not surrounded by open space, this has the effect of trapping and concentration the air pollution. At times when congestion is at its worse, the children of Greetland are walking to school, close to the ground, due to their height, this is where pollution from traffic is at its highest levels of concentration. I am worried for the health and cognitive development of the children of Greetland, should this development be passed. How can we justify the complete lack of attention this issue has received? I was present at the Greetland Pressure Group protest outside of the Town Hall. The children themselves were protesting in pollution masks and they waved homemade flags that read poison the children, poison the future. The effects of this development may well be felt in economic terms in years to come, in the form of a workforce that was denied the opportunity to reach their potential, due to the poisonous air they had no choice but to breath.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

This process was supposed to be easy and simple to access, it was not.

Suggested Modifications:

Remove this land from the Local Plan

Comments:

Additional Evidence Link:

Comment ID **HRU1415** Site ref (if applicable):

Person ID: **1243823** Name: **Miss Alison Thelwell** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

I strongly object to this proposal on the grounds of A. The increased traffic and noise pollution which will be generated. We are currently about half way through gas repair works at one of the key crossroads in west vale and at all times of the day traffic heavily builds up. This is an indication of how congested the area will become on a daily basis. At the other West Vale crossroads turning from the Elland direction towards Halifax is already difficult sometimes with just one car moving through the lights in time. This goes on to strain the rest of the road network. I believe it was considered a few years ago that it wouldn't be possible for a second filter lane to be created to ease congestion so this will be something which will only become an even greater problem. B. The newly generated traffic from the proposed site could lead to Sunnybank road becoming a rat run as commuters use it to avoid one set of traffic lights on the way to Halifax. C. Our current Schools are already at full capacity, how will it they handle the increased population? Our current schools cannot surely handle this increase. Greetland on its own is only a small village and cannot be expected to cope with this. D. The lower grounds of the village are very well known to become flooded during spells of bad weather. This has been well publicised this month alone. Removing much needed green belt land will no doubt push the problem elsewhere. We need the open fields to soak up excess rainfall and act as a natural flood defence system. Tarmaced housing estates in its place will lead to catastrophic consequences in this situation. E. The area has current derelict brown field sites. Why cannot these be considered as potential sites which will improve the area and in turn save our green belt land.

Do you consider the plan to be Sound?: **No**

Sound Reason:

I strongly object to this proposal on the grounds of A. The increased traffic and noise pollution which will be generated. We are currently about half way through gas repair works at one of the key crossroads in west vale and at all times of the day traffic heavily builds up. This is an indication of how congested the area will become on a daily basis. At the other West Vale crossroads turning from the Elland direction towards Halifax is already difficult sometimes with just one car moving through the lights in time. Thisgoes on to strain the rest of the road network. I believe it was considered a few years ago that it wouldn't be possible for a second filter lane to be created to ease congestion so this will be something which will only become an even greater problem. B. The newly generated traffic from the proposed site could lead to Sunnybank road becoming a rat run as commuters use it to avoid one set of traffic lights on the way to Halifax. C. Our current Schools are already at full capacity, how will it they handle the increased population? Our current schools cannot surely handle this increase. Greetland on its own is only a small village and cannot be expected to cope with this. D. The lower grounds of the village are very well known to become flooded during spells of bad weather. This has been well publicised this month alone. Removing much needed green belt land will no doubt push the problem elsewhere. We need the open fields to soak up excess rainfall and act as a natural flood defence system. Tarmaced housing estates in its place will lead to catastrophic consequences in this situation. E. The area has current derelict brown field sites. Why cannot these be considered as potential sites which will improve the area and in turn save our green belt land.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

I strongly object to this proposal on the grounds of A. The increased traffic and noise pollution which will be generated. We are currently about half way through gas repair works at one of the key crossroads in west vale and at all times of the day traffic heavily builds up. This is an indication of how congested the area will become on a daily basis. At the other West Vale crossroads turning from the Elland direction towards Halifax is already difficult sometimes with just one car moving through the lights in time. Thisgoes on to strain the rest of the road network. It was considered a few years ago that it wouldn't be possible for a second filter lane to be created to ease congestion so this will be something which will only become an even greater problem. B. The newly generated traffic from the proposed site could lead to Sunnybank road becoming a rat run as commuters use it to avoid one set of traffic lights on the way to Halifax. C. Our current Schools are already at full capacity, how will it they handle the increased population? Our current schools cannot surely handle this increase. Greetland on its own is only a small village and cannot be expected to cope with this. D. The lower grounds of the village are very well known to become flooded during spells of bad weather. This has been well publicised this month alone. Removing much needed green belt land will no doubt push the problem elsewhere. We need the open fields to soak up excess rainfall and act as a natural flood defence system. Tarmaced housing estates in its place will lead to catastrophic consequences in this situation. E. The area has current derelict brown field sites. Why cannot these be considered as potential sites which will improve the area and in turn save our green belt land.

Suggested Modifications:

A. We are currently about half way through gas repair works at one of the key crossroads in west vale and at all times of the day traffic heavily builds up. This is an indication of how congested the area will become on a daily basis. At the other West Vale crossroads turning from the Elland direction towards Halifax is already difficult sometimes with just one car moving throughthe lights in time. This goes on to strain the rest of the road network. It was considered a few years ago that it wouldn't be possible for a second filter lane to be created to ease congestion so will be something which will only become an even greater problem. B. The newly generated traffic from the proposed site could lead to Sunnybank road becoming a rat run as commuters use it to avoid one set of traffic lights on the way to Halifax. C. Our current Schools are already at full capacity, how will it they handle the increased population? Our current schools cannot surely handle this increase. Greetland on its own is only a small village and cannot be expected to cope with this. D. The lower grounds of the village are very well known to become flooded during spells of bad weather. This has been well publicised this month alone. Removing much needed green belt land will no doubt push the problem elsewhere. We need the open fields to soak up excess rainfall and act as a natural flood defence system. Tarmaced housing estates in its place will lead to catastrophic consequences in this situation. E. The area has current derelict brown field sites. Why cannot these be considered as potential sites which will improve the area and in turn save our green belt land.

Comments:

Additional Evidence Link:

Comment ID **HRU1423** Site ref (if applicable): **LP0026**

Person ID: **1243841** Name: **Mrs Helen O'Hara** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

The duty to cooperate has not been complied with (see below). The consultation process has not bee publicised by the council to local residents in a timely and efficient manner.The Greetland sites have been included in the Elland header, Greetland is not part of Elland and many members of the public have overlooked the local plan thinking it did not apply to them. This is misleading. For 18 days of the consultation period the links to the supporting documents were not accessible. The council are aware of this problem. The NPPF has been largely ignored. The Sustainability Appraisals for sites LP0026, LP0952, LP0177 & LP1625 have not been prepared properly and too many questions remain unanswered.

Do you consider the plan to be Sound?: **No**

Sound Reason:

(UN)Sustainability. Calderdale Council has prepared sustainability report for this site. The report is unsound. The sites are rated on a traffic light system Green (Positive), Red (Negative) & Yellow (Uncertain). For 'uncertain' please read: WE DO NOT KNOW WHAT WILL HAPPEN. This site, LP0026, has been assessed against 17 Objectives and the results are: 1 x n/a 5x positive 1x negative 10x uncertain The Council does not know the answer to 10 of the 16 objectives which relate to this site. That's 62.5% of the objectives being uncertain. This is not good enough, the council is promoting the development on land when it does not know what the impact of that development will be. The answer should never be 'uncertain' more questions should be asked until an answer, be it positive or negative, is arrived at. E.G. This is a proposed residential housing site - How can it be said that ripping up fields and replacing them with tarmac and houses will positively impact biodiversity? It is a nonsense. Objective 9 should be deemed as a negative. This is unacceptable. The plan is unsustainable. There are too many unknowns for this site. The Housing Requirement is overstated in the Local Plan. The housing requirement calculated in the Calderdale Local plan is significantly overstated. The Council relies on the Report of Turley: 'Modelling the Economic Implications of the Proposed Housing Requirement' . This report is unsound. It is projects that Calderdale will create a significant number of jobs over the next 15 years, these jobs need workers to fill them and the workers themselves will of course need homes. The resulting projected housing requirement is incorporated in the Local Plan. We are told the jobs will be filled by migrants etc and Turley advise that Calderdale will experience migration numbers above the historical average. Turley relies on data from 2014 which is before a referendum on the UK's EU membership was even contemplated. The historical average relied upon by Turley includes migration as a result of the UK being an EU member state and its participation in the EU's core principle of free movement of people. The EU is an economic trade block with a population of circa 400,000,000 people which now the UK is no longer part of. Free movement of people ends in December 2020, access to workers will be significantly reduced as a result. In any case, according to migration watch net migration into the UK has fallen since 2015: : www.migrationwatchuk.org/statistics-net-migration-statistics. The ONS figures confirm that UK birth rates are falling. The UK's demographic is changing, there are more retired people in the population, less workers. Even if Calderdale experiences migration at levels at the historical average, there will not be enough workers to fulfil Calderdale's unrealistic economic aims. It is only by unrealistically projecting migration levels above the historical average that the plan can be taken seriously. Turley's methodology is flawed, all the objective data tells us that migration levels will drop. In addition, Government is introducing a point based immigration system and low skilled workers will face difficulties in obtaining visas according to the Home Secretary, Priti Patel (The Times 20/02/2020). There is already a national shortage of workers. there will not be enough workers to fill the homes Calderdale wants to plan for, therefore the plan is unsound. The council got its maths wrong when the first incarnation of this plan was submitted to the

inspector, hence the need for more sites to be allocated now. This is evidence in itself that the council is unable to properly plan and strategise. The revisions to the plan represent further unsustainable development with a disproportionate amount of new homes proposed across four sites in Greetland with 1041 additional units of the 1708 on new housing sites (over 60%) proposed in the Elland area. The function of the planning system is to facilitate sustainable development that makes a positive contribution to the environment. It is not the role of the Council to release demonstrably unacceptable sites within the Green Belt to meet a housing target! The Inspectors letter of 16 July 2019 to the Council notes (Para 14) that "local plans should meet objectively assessed needs unless adverse impacts of doing so would significantly and demonstrably outweigh the benefits" this is exactly the case in Calderdale. Later, where the Inspector asked the council to review the option of 'the supply of more suitable and available sites elsewhere', however, the further work on the additional sites considered (incorrectly by the Council) to be 'suitable and available' are not, in fact, suitable or available, and in any case it has been revealed that this option is simply not sustainable. Flooding I attach a photo which proves that this site floods. The Black Brook river flows to the south of this sloping green belt site. The Calder Valley and Calderdale generally experience significant flooding regularly and a reported Â£40M has been spent in attempts to mitigate these issues without success: See Storm Ciara/Mytholmroyd This site acts as a natural water tank holding countless gallons of rainfall and releasing it predictably and slowly into the Black Brook. If this land is built upon it will increase surface run off, increase water transit speeds and increase peak water volumes in the Black Brook itself. West Vale, Elland and Brighouse will flood. George Eustice MP, the DEFRA Secretary wishes to encourage the use of natural flood mitigation techniques and to retain natural flood plains to reduce peak river flows: Speaking on BBC Radio 5L 22/02/2020 at 08:08 hrs. This plan goes against the aims of the NPPF at paragraphs 155 & 163 and elsewhere. It is also against national policy as described by George Eustice MP. Mitigation measures will not succeed. This land is unsuitable for development. Green Belt Chapter 13 NPPF deals with Green Belt planning policy and has not been followed by Calderdale Council. Brownfield sites should be considered first although Calderdale Council does not appear to have considered any Brownfield sites. There is no Brownfield register available see para 119 of the NPPF. There are countless Brownfield sites within Calderdale which are suitable for housing. The council has failed to demonstrate that Exceptional Circumstances exist so as to develop the Green Belt at this site. Housing Densities within the Local Plan If Calderdale increased housing densities elsewhere in the plan this site would not be required. The Brighouse housing densities are unsustainable and are not an 'Effective use of Land' per Chapter 11 NPPF. Densities should be increased in the Brighouse allocations to save this site see NPPF paragraphs 122 & 123 Infrastructure All 4 sites, 600 houses, lie alongside 1 main road, Saddleworth Road. The side roads are very narrow most of them being single track and this is true particularly for Scar Bottom Road and Brian Royd Lane. Peak traffic times see cars queuing up Saddleworth attempting to pass through the junction at West Vale. This junction is currently over 100% on volume to capacity ratio (reference Parsons Brinckerhoff report Calderdale Local Plan Transport Modelling). The road network could not cope with a further 1200 cars. Air Pollution 'Lets Clear the Air' This is the slogan used by Calderdale Council. No air quality has been carried out at West Vale junction. Saddleworth Road has a pre school and a primary school at its side. The children are aged 30 months to 7 years old. They are subjected to the standing traffic all day, every day. Their little bodies are closer to the ground and they breathe a lot quicker than we do. We are seeing evidence of air pollution on developing brains and asthma. They need us to stand up and be their voice! The homes proposed are 4/5 bedroom executive homes. They will not be people catching the local bus to Halifax for work they are Leeds and Manchester commuters. This is not sustainable development. Wildlife This site is a wildlife corridor and building on it would have an unacceptable effect on local habitat etc.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Calderdale Council knows that there is a significant flood risk in its borough. This is not true of

neighbouring authorities, Calderdale should partner with ALL neighbouring authorities to transfer some of the housing need to those neighbouring Authorities. Calderdale has not done this.

Suggested Modifications:

Reconsider the economic data upon which Turley's report is based. Update it using current data now that the UK has left the EU. Increase housing densities in Brighouse. Remove LP0026,LP1625,LP0177 & LP0952 from the Local Plan. Commission a complete survey of the available Brownfield sites in Calderdale

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5609793 ; http://calderdale-consult.objective.co.uk/file/5609792 ; http://calderdale-consult.objective.co.uk/file/5609740

Comment ID **HRU1428** Site ref (if applicable): **LP0026**

Person ID: **1243973** Name: **Mrs Amy Hannah** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

All points below should be considered to apply to sites LP0026, LP0177, LP0952 and LP1625 and therefore these sites should equally be rejected from the Local plan. I would like to point out that plans LP0026 (The Gate Farm), LP0177 (Land adjacent Ellistones Place), LP0952 (Land at New Gate Farm) and LP1625 (Land to the west of Silverdale Terrace) should be considered as one and these are not separate proposals as they are so interrelated (sited within a small 1 km area along Saddleworth Road) that they can only be assessed fairly if considered as a whole.By splitting them out as separate plans the full picture is being concealed. The Local Plan does not address the implications of the National Planning Policy Framework, especially, NPPF Para 177 and the associated PPG in the Sustainability of Greenbelt Sites. According to the NPPF Para 143 under 'Proposals affecting the Green Belt' it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' The very special circumstances do not apply. Other reasons not legally compliant. Poorly advertised and believe that residents of Greetland have not been made aware of the proposal and given opportunity to comment.

Do you consider the plan to be Sound?: **No**

Sound Reason:

My main points of objection are as follows: Flooding issue This affects the whole area and is relevant to all sites in question. The land put forward is unsustainable. Further development will result in additional surface run off. This in turn will contribute to further flooding. The fields considered for development currently act as a natural flood defence and even without the further development they are unable to cope with absorbing heavy rainfall. We have seen the effect of this in recent weeks and it has resulted in severe flooding in the area, flooding of Black Brook at the bottom of these fields and into West Vale. In 2015, the Boxing day Floods demonstrated this at its worst. Clearly, building more houses on these fields will cause major issue contributing to further more serious flooding. Calderdale council therefore have a duty of care to comply with current policy and legislation on flooding and they should remove these fields from the

Local Plan. Para 155 of the NPPF states that ' Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas of highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere ' Effect on Greenbelt Land The NPPF at a para 133 states that -“ The Government attaches great importance to Green Belts "and at para 136 that -“Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified"At para 144 it further states -“ local planning authorities should ensure that substantial weight is given to any harm to the green belt"and at para 145 -“ a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt "Building on these sites is contradictory to all of these statements. If considering all of the sites as one as we should be doing, the development would mean a large and disproportionate amount of land and open space would be lost from this small community. This also includes the loss of public amenity, wildlife habitats (foxes, badgers, bats, rabbits, deer, birds of prey), loss of green space, loss of wildlife corridor, loss of public footpaths and the creation of urban sprawl. I believe such loss associated with Greenbelt will contribute to affecting our community's wellbeing and mental health in a negative way. The Greenbelt is free for the community to use and greatly benefits the vast majority of residents who utilise this on a daily basis. The land is a quiet, safe and therapeutic environment and is the centre of our community. To lose all this would be devastating. Increased air pollution The proposed plans would obviously create more air pollution due to more houses, more people and more cars. The single biggest air polluter is traffic, or road vehicles. More people die of air pollution than Malaria and HIV, this should be a consideration when looking at these proposed plans to develop on such disproportionate scales. The Clean Air Strategy 2018 states that - While we need to ensure economic growth, we also need to realise the 'cost of air pollution on health'. Infrastructure The increase in houses at this capacity will add a huge pressure to already full schools in the area. The schools are not big enough to cope with this amount of new housing. The doctor's surgery is also full and already struggles to cope with the number of patients and appointment requests. The NHS dentists have long waiting lists without further increase to residents. There is one main road which runs through the proposed area which would not be sustainable for such an increase in traffic as a result of the development. The existing sewage system and drainage cannot cope with the current volume and with the rain water seen in recent times and in past years has caused the raw sewage to overflow into the footpaths and fields in the area. This problem would only increase with further development. Traffic congestion and noise pollution Greetland and West Vale already suffer chronic traffic congestion, The village is already at breaking point at peak times and the roads cannot cope with the existing volume of traffic, let alone adding to that with these proposed developments. At school drop off times Saddleworth Road becomes a single lane road due to the parked cars on both sides.It becomes an obstacle course to get through and the large lorries that frequent the area make it dangerous for road users and pedestrians. I fear for the lives of the children trying to get to school daily..

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Do not build any of the houses proposed in the Local Plan on the Greenbelt.

Comments:

Additional Evidence Link:

Comment ID **HRU1431**

Site ref (if applicable): **LP0026**

Person ID: **1243994** Name: **Mrs Ross Hallam** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

The development represents intrusion into the green belt, loss of green space, a threat to bio-diversity and, will contribute to local issues in respect of traffic congestion, flooding and air pollution. These impacts will be significantly exacerbated when considered alongside the other sites that have also been put forward (0026, 0177, 0952, 1625) and the cumulative of all these sites represents disproportionate allocation of housing for this area. The justification for which appears to be reliant on the Greetland and Stainland ward being associated with Elland for the purpose of the local plan,. The links between these settlements are limited. The local infrastructure cannot cope with the likely level of intensification from developing these sites. The resulting traffic problems will cause extensive traffic congestion issues, compromise highway safety and impact air quality. The opportunities for improving infrastructure are limited and improvements outside the locality will do little to alleviate the issues. The intrusion into the green belt is unjustified and will significantly harm the character and setting of the locality. Flooding, the sites all experience varying degrees of flooding and given this is now such an issue, how can it be considered suitable to develop areas with a known flood risk. The sites have significant bio-diversity value that will be severely compromised by their development for housing. The need for additional housing is based on historically unprecedented economic growth. The plan places economic development to the detriment of the local community and environment conflicting with the aims of sustainable development.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1438** Site ref (if applicable): **Lp0026**

Person ID: **1243885** Name: **mrs victoria travis** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

I do not consider the plan to be sound for the following reasons; Greenbelt NPPF states greenbelt development should demonstrate exceptional circumstances. The site assessment report and sustainability appraisal report does not demonstrate any exceptional circumstances. Brown field site should be exhausted. A site on Saddleworth road in Greetland has just come up for sale. An allowance for brown field windfall sites should be included in the Local plan due to Calderdale manufacturing heritage. Optimising the density of development in other areas. Can other sites have that have already been allocated for development have their density increased? The Turley 2019 report makes no mention of discussion with neighbouring authorities to see if they could accommodate some of the housing needs. This could part of the Leeds City region approach. Urban sprawl This site is classed as highly sensitive greenbelt and grade 3 agricultural land. Development of this site would result in loss of openness and urban sprawl as this is currently the boundary of the greenbelt. Development of this land would be an extension to the village which would be classed as urban sprawl. As with developments on the edge of the village the site would therefore be furthest away from all infrastructure school, doctors and train station well over 2KM. Development of this site would result in the most damage to the environment as new resident would be heavenly dependent on their cars to travel anywhere it would be lengthy round trip by foot to the local co-op, this is not sustainable development. Air Quality In 2019 Calderdale council announced a climate emergence. -“We cannot solve the air quality issue alone, everyone has a role to play. With Let's Clear The Air we are asking residents to take action of their own. This includes more sustainable travel choices, where possible -“ Building houses on Green belt land on sites with no proposed infrastructure, where car travel is inevitable will greatly reduce air quality. Flooding Sustainability appraisal report Firstly it should only be a positive or a negative outcome. Uncertain in the case of LP0026 generally mean negative, for example Objection 7 flooding, uncertain. In the site report the response to flooding comments are -“This site is not agreed in the public domain due to past flooding history of an area near Scar Bottom Lane and development site is being used as flood storage area during winter flooding. Numbers of drainage issues have been occurred in the surrounding areas and suitable actions being placed. -“ The flooding risk is not uncertain it is inevitable. Boris Johnson has stated we must stop building on flood plains. 10 uncertain responses out of 17 on a sustainability report, this means the majority of answers are uncertain the document is there for of no sound use. This site has numerous springs which popped up during Storm Clara, my neighbours were left frantically trying to stop there house flooding and narrowly escaped being flooded due the their hard work and self-bought sand bags. This does however correlate with the environment agency flooding map, which describes the site as high risk of surface water flooding, however Calderdale do not use this and class the site as uncertain for risk of flooding. Infrastructure Policy on plus transport. There is no infrastructure planned for Greetland. There is a train station planned for Elland I first herd of this 20 years ago! If the elusive station is supplied there is the obstacle of West Vale which all residence must travel though. WSP Parsons Brinckerhoff Report on Transport Network states that, "¢ This report identifies that traffic congestion at the junction of Stainland Road-Saddleworth Road would increase by approximately 105% "¢ This report also identifies that traffic congestion at the juncture of Stainland Road-Rochdale Road would increase by over 100% It is simply not fair to increase a village by 600 houses and offer no infrastructure. PLEASE NOTE GREETLAND IS NOT IN ELLAND. No regard for extra school places as the NPPF suggests there should be. An error in the site assessment summary is journey time to Town 15 minutes, This is backed up in the site assessment reports, journey time to hospital 30 to 60 minutes. The hospital in located on the journey to Town before the Town centre in reached. Therefore the journey time to town is 30-60 mites too. Wildlife There will be a loss of habitat if the site is developed, bats, woodpeckers, deer, kestrel and herons are regularly seen on site LP0026 All the trees have TPO on them in this site Availability The site assessment report states that. -“While the majority of the site is available, no availability information has been obtained regarding a small section of the site adjacent to Saddleworth Road. This will be reflected in the trajectory as it may impact on delivery timescales."

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

LP0026 removed from the Local Plan

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5634598

Comment ID **HRU144** Site ref (if applicable): **LP0026**

Person ID: **1239027** Name: **Mr Nigel Duckworth** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

1) The current policy and legislation on flooding states -“due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in high flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere"- In the Calderdale Boxing Day Floods 2015 the field LP0177 Ellistones Place Saddleworth Road, Greetland suffered severe flooding. Any building on this land would cause flooding and therefore does not comply with current flooding policy and legislation as outlined above. Calderdale Council Planning Department has a legal responsibility to comply with current policy and legislation on flooding. These fields are a natural and essential soak off and any building on this land would further increase the flooding in this high risk flood area. 2) I draw your attention to Esther McVey, Housing Minister's written policy on Green Belt land.; -“Of course one of the most important environmental safeguards we have is the Green Belt. And I want to be clear that our commitment to this is as strong as ever, with any changes only happening in exceptional circumstances ; protecting the Green Belt goes beyond protection against development"- Esther McVey has provided Â£2 million pounds for Councils to employ Enforcement Officers to prevent Green Belt land being built illegally and Calderdale Council is listed as one of the Councils who is a recipient. The Enforcement Officer's role is to ensure "unscrupulous developers" do not apply pressure on Councils to build on the Green Belt and not the available brown field sites because "developers don't want to build on brown fields sites". - Horsfall Mill is an ideal brown field site and meets the demographics of the area perfectly and complies with the NPPF government policy of -“building the right houses in the right places" Exceptional circumstances in The Government White Paper -“Fixing our Broken Housing Market"Parag 1.39 states that: The Government wants to retain the high bar to ensure the Green Belt remains protected, but we also wish to be transparent about what this means in practice so that local communities can hold their councils to account therefore we propose to amend and add to the National Policy to make it clear that: authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including :- making effective use of suitable brownfield sites (Calderdale Council has not adhered to this with regard to Horsfall Mill, West Vale) and the opportunities offered by state regeneration :- I refer to the Judicial Review - Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Councill (2015) EWHC 1078 (Admin), Jay J - where Richard Turney appeared for the claimant "Mr Turney ... submitted that the fact that

a particular site happens to be suitable for housing development cannot, without more, constitute an exceptional circumstance justifying an alteration of the Green Belt. I agree with Mr Turney insofar as this goes .. Suitability simpliciter cannot logically be envisaged as an exceptional circumstances". -This land is classified as "highly sensitive green belt" on the Local Plan and there is no legal justification for building on this land. It is not legal to classify Green Belt as green field on the Local Plan ; they are totally different and your own tests states all the Green Belt land identified on Saddleworth Road in the Local Plan for building meets the five test and therefore you have no legal right to change this classification. I question the legality of Greetland being placed in with Elland on the Local Plan; Greetland is a small village in the Greetland/ Stainland Ward HX4 whereas Elland is a town HX5 ward. This is false representation and when you look at the building volume withinthis area of approximately Â½ a mile in this small village taking out the whole of the Green Belt land on the south side of Saddleworth Road this will totally change the nature / look and the openness of the vi llage and is a prime case of urban sprawl. Mr Justice Jay in the Calverton Parish Council v Greater Nottingham Councils [2015] EWHC 1078 stated that:- -“it would be illogical, and circular, to conclude that the existence of an objectively assessed [housing] need could, without more, be sufficient to amount to -“exceptional circumstances"within the meaning of paragraph 83 of the NPPF" R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404, Treacy, Underhill, Lindblom LJJ -“The concept of -“openness"here means the state of being free from built development, the absence of buildings ; as distinct from the absence of visual impact"[7] Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council [2015] EWHC 1078 (Admin), Jay J

Do you consider the plan to be Sound?: **No**

Sound Reason:

Horsfall Mill, West Vale is ideally located for affordable, good quality housing; it would not change the nature or look of the village and is perfectly located for young first time buyers to access the many amenities / leisure facilities without the need for a car. T he Calderdale Plan targets for housing as we have now come out of the European Union the housing volume should be less resulting in a much lower housing target and reduce the need to release the Green Belt sites in Greetland. The NPPF sets out the aim of Green Belt policy which is -“to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."(NPPF Â¶79). Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: (i) to check the unrestricted sprawl of large built-up areas (ii) to prevent neighbouring towns merging into one another (iii) to assist in safeguarding the countryside from encroachment (iv) to preserve the setting and special character of historic towns (v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The Council, in its own evidence, concludes that the overall parcel within which the site is located performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt but, most decisively, would see the coalescence of Greetland and West Vale and the deterioration of the identity of both places undermining the Council's Settlement Hierarchy. Notwithstanding this, the quantum of housing proposed in and around the site is undeliverable during a single plan period in plan-making terms and unsustainable in infrastructure terms in relation to the capacity of existing highways, schools and local services. Accordingly, these sites on Saddleworth Road in the existing Green Belt should be removed from the Plan as the exceptional circumstances fortheir release does not exist. Furthermore the proposed sites do not meet national policy with regards to flooding. Clean Air Policy ; even higher numbers of traffic would cause further pollution in what is already a bottleneck area of high congestion. And be detrimental to the health of the toddlers / young children at Sunny Bank Nursery / Pre-School whose playground is situation approximately 3 feet from this very busy main road (picture attached of congestion down this road). Saddleworth Road services many areas i.e. Barkisland , Ripponden, Norland and other outline districts and heavy goods vehicles regularly use this road e.g. Sonoco; these are high

pollutant diesel vehicles and evidence shows particles of pollution fall lower to the ground making small children more vulnerable.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

To built on the Green Belt sites proposed in the Local Plan would totally change the nature / look and openness of the village in a very detrimental way to both residents and wildlife in this wildlife corridor whilst also being illegal due to the flooding and protected Green Belt policy in the NPPF.

Suggested Modifications:

N/A

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5595145

Comment ID **HRU1440** Site ref (if applicable):

Person ID: **1243996** Name: **Mr Gethin Jones** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Green Belt: As stated in NPPF: -“The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."(NPPF, Para 133, 2019) -“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy"¦..makes as much use as possible of suitable brownfield sites and underutilised land."(NPPF, Para 136-137, 2019) The Local Planhas failed to examine fully all other reasonable options and has failed to provide a compelling argument for exceptional circumstances.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Planned developments have to be proportionate to the size of our existing settlements. Infrastructure planning specifically in relation to healthcare needs to be prospective rather than retrospective. I have significant concerns with the lack of specific plans in relation to healthcare provision in the area given the extent of the proposed developments. Sites LP26, LP177, LP953 and LP1625 are in very close proximity and as such my comments are to be considered for all these sites given their cumulative impact on the local area. Rather conveniently, in their evidence submissions, Calderdale council have chosen to disguise the disproportionate development in the Greetland area by combining it with areas where there is less significant development planned. (Elland, Stainland and Holywell Green). The quoted figure of 8.21% growth in the number of dwellings cannot be used as a reference when considering the effect on the local

infrastructure. The Calderdale Review of Polling Districts in 2019 states that there are 1726 dwellings in the Greetland and Sunnybank wards. The above named development propose 543 new dwellings in these wards giving a staggering percentage increase of 31.4%. This clearly represents a disproportionate increase in the area. Report CC37 details a previously proposed development site which was considered and rejected in neighbouring Barkisland due to a "disproportionate increase to Barkisland village". This represented a 16.6% growth in dwellings. Questions must be asked about the boundaries used by Calderdale Council when calculating their growth percentage in Greetland. As a healthcare professional working in primary care in Calderdale I have significant concerns with the clear lack of infrastructure planning in the local plan generally, especially in relation to healthcare provision. The -“Health and Wellbeing Infrastructure Supporting Paper" submitted as evidence is somewhat inadequate as reassurance that there is any meaningful plan to address the concerns of the local community in relation to healthcare access given the disproportionate increase in population planned. This is summarised well in its conclusion: -“The Local Plan has been prepared at a time of significant change to the delivery of health and social care. These changes are yet to embed themselves and as such it is not possible at the present time to provide a finalised position on the physical health and wellbeing infrastructure that will need to be delivered..." This is not an adequate plan. This conclusion does not satisfy national policy nor NHS Policy statements: The National Planning Policy Framework specifically requires councils to -“take into account and support the delivery of local strategies to improve health, social and cultural wellbeing at the local plan stage." (NPPF, 2019) -“Embedding well-evidenced health priorities into the local plan is a powerful way for the NHS and public health to empower planners to create healthier places." (Putting Health into Place, NHS England 2019) Furthermore, rather worryingly there is no mention at all in the -“Health and Wellbeing Infrastructure Supporting Paper" about any plans regarding frontline NHS services not under the control of the CCG, specifically dentistry. The local NHS dental service is already oversubscribed and inadequate for the needs of the existing population. An NHS Choices search conducted in January 2020 showed no dental surgeries accepting new patients in a 10 mile radius of the proposed developments. There is no evidence of any consultation with local providers or NHS England in this regard. This is a missed opportunity to identify a strategy to address inequalities in access to healthcare in our area. A 31.4% increase in dwellings in an area serviced by 1 dental practice would cause an access crisis with resulting impacts on the local GP surgery and A&E department. In conclusion. The percentage increase in dwellings has been misrepresented in the figures submitted. The potential impact of the true 31.4% increase in the area or Greetland would be catastrophic.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Remove site from local plan as unjustifed development on Greenbelt land with no exceptional circumstances. Properly assess the impact of a 31.4% increase in dwellings in Greetland. Provide meaningful plans on healthcare provision for such a population increase.

Comments:

Additional Evidence Link:

Comment ID **HRU1454** Site ref (if applicable): **LP0026**

Person ID: **1243998** Name: **Mrs A Hemsworth** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Sustainable Development I believe that th e council has not fully considered brown-field sites , and that the council should not be put under pressure from house builders who prefer the ' easier ' option of greenfield sites. The plans for this site are not sustainable. Your data shows that Greetland has been combined with Elland, and therefore the figures show a distorted image. In reality, houses on this site (as part of over 600 new homes) is disproportionate to the size of the village of Greetland a n d would significantly alter the semi rural nature of our exi sting community. Green Belt Th is land is designated as Green Belt land and as such prevents urban sprawl between the villages of Greetland, Barkisland and Stainland. What are the exceptional circumstances for building on this land ? You do not provide any evidence! Flooding This site does NOT meet the National Policy with regard to flooding. T his land p rovides an area for excess rainfall to settle , soak and drain away in to Black Brook , which then flows in to the River Calder at West Vale . There are layers of clay in the Greetland hillside, and there are many springs as a result. Water drains through the millstone grit and off the hillside and moors above , following a complex drainage system of springs, streams, old mill dams and wells, which slow the flow of the water. T h is land is not suitable for housing due to the high water table and the fact that the lower part of the field floods regularly . We must let the water soak away naturally and NOT add to the already devastating floods experienced in Elland and further down the valley. Our weather systems are changing and what was once considered to be a ' once in a 100 year flooding event ' is now happening every few years. Traffic ; With over 600 houses proposed in total, th ere would be a potential 1200 extra cars on Saddleworth Road. The re is already chronic congestion at the two (unavoidable) junctions in West Vale which causes traffic to back-up through the local villages of Greetland and Holywell Green and any extra traffic would cause massive tail backs ; WSP Parsons Brinckerhoff Report on Transport Network states that: traffic congestion at the juncture of Stainland Road-Saddleworth Road would increase by approximately 105%, and that traffic congestion at the juncture of Stainland Road-Rochdale Road would increase by over 100%. Air Pollution - Unfortunately, cars are often queueing for the west vale traffic lights right outside the junior school on Saddleworth Road. This proposed development will cause considerably more pollution, allowing toxic air to compromise the health of vulnerable developing children , stunting lung growth and causing life-long health problems. The pollution caused will affect all the residents of our village, and s urely this goes against the Calderdale Council's own Air Quality Action Plan and the West Yorkshire Low Emissions Strategy. Infrastructure ; The infrastructure of the area cannot support the extra households for this site , never mind the 600 households if the whole of the proposed development s are approved. We have no extra capacity in the school ; Calderdale council's own figures show that a further 206 school places would be required. T he GP surgery could not cope with an extra 600 families, and the NHS dentist already has a waiting list . The Local Neighbourhood Plan Committee recently commissioned a report as part of their programme to preserve and retain Green Spaces for the Health and Wellbeing of all local people.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1458** Site ref (if applicable): **LP0026**

Person ID: **1239035** Name: **Mrs Lindsay Gilroy** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

points of objection; 1. air pollution 2. Disproportionate development in Greetland 3.infrastructure 4.wildlife 5. traffic congestion 1. Air pollution The traffic congestion in the area is already beyond manageable. As a mother of 2 young children, the quality of the air is already a concerns. The traffic through west vale is already unmanageable with stationary traffic along stainland road, Rochdale road, saddleworth road and surrounding areas. when walking to school, my children are at risk from this pollution with cars sat in this traffic with engines running, the extra vehicles the extra houses would generate assuming an average of 2 per household would make this completely impossible. Houses and ultimately extra care built in the area has a knock on effect for all routes. 2. Disproportionate development in Greetland Greetland is a small village in its own right, the extra housing proposed would increase this disproportionately. There is currently development on brownfield land in the village which will increase housing and free up family homes already in the village. For the purpose of this plan, Greetland has been included as part of Elland which is inaccurate. It has its own schools, surgery and high street, sufficient for the current population, but certainly not for an increase in population of this size. 3. Infrastructrure the village currently has 2 schools, Greetland and West vale, both at full capacity, certainly no capacity to accommodate the potential increase in population from hundreds of family homes. Greetland key stage one has a small outdoor space which is vital for the children. parking at both sites is already very dangerous. The GP surgery is also extremely busy and under pressure. It is difficult to get an appointment and the staff and service are under pressure from the existing caseload. 4. wildlife The greenbelt surrounding Greetland is its very identity and to destroy this would be a crying shame and irreversible. It is home to a variety of wildlife - deer, fox, herons to name a few. the local community enjoy the local greenery and this is the very appeal of the area. If this goes ahead I fear future generations will miss out on the beauty of this. We have a duty to protect this space and its inhabitants. I am certainly not comfortable with destroying this. 5. Traffic congestions The traffic in west vale and surrounding areas is out of control as it is. I often fear for the safety of the local school children as the cannot cross at the pedestrian crossing due to queuing and then moving traffic whilst the crossing is at green. it is only a matter of time before there is an accident, to add the potential volume of traffic would be a disaster. The proposed site is also a route children use to walk to school, this is a stunning walk and allows children to experience nature along the stream and walking through the green fields (when it isn't flooded!)

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1469** Site ref (if applicable):

Person ID: **1244002** Name: **Mr Guy Hirst** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

LP0177 The site is subject to surface water flooding. It is clear on very recent evidence that building here will only exacerbate the likelihood of flooding issues downstream Additional housing in this area will lead to extra traffic at West Vale, a confluence of roads which is already unable to properly deal with current traffic . That is partly because of the concentration of water and gas services in that village which are frequently needing repair and replacement increasing congestion and thus delaying road users. Current gas main laying confirms this (6 Jan 202 to date) Alternativeimprovement tothe road layout is not economically viable Traffic issues at the Saddleworth Road/ Stainland Road junction is already made worse because of the five road congestion

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Remove LP0177 from the plan

Comments:

Additional Evidence Link:

Comment ID **HRU1470** Site ref (if applicable): **LP0952**

Person ID: **1244002** Name: **Mr Guy Hirst** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

LP0952 The site is subject to surface water flooding. It is clear on very recent evidence that building here will only exacerbate the likelihood of flooding issues downstream Additional housing in this area will lead to extra traffic at West Vale, a confluence of roads which is already unable to properly deal with current traffic . That is partly because of the concentration of water and gas services in that village which are frequently needing repair and replacement increasing congestion and thus delaying road users. Current gas main laying confirms this (6 Jan 202 to date) Alternativeimprovement tothe road layout is not economically viable Traffic issues at the Saddleworth Road/ Stainland Road junction is already made worse because of the five road congestion

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 **HRU1471** Site ref (if applicable): **LP1625**

Person ID: **1244002** Name: **Mr Guy Hirst** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

LP1625 The site is subject to surface water flooding. It is clear on very recent evidence that building here will only exacerbate the likelihood of flooding issues downstream Additional housing in this area will lead to extra traffic at West Vale, a confluence of roads which is already unable to properly deal with current traffic . That is partly because of the concentration of water and gas services in that village which are frequently needing repair and replacement increasing congestion and thus delaying road users. Current gas main laying confirms this (6 Jan 202 to date) Alternativeimprovement tothe road layout is not economically viable Traffic issues at the Saddleworth Road/ Stainland Road junction is already made worse because of the five road congestion

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 **HRU1477** Site ref (if applicable): **LP0026**

Person ID: **1243992** Name: **Mr Vaughan Kershaw** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

I am writing to register my objection to part of Site LP0026. Flooding The flooding implication of the proposed development in Greetland would have far reaching implications for the residents of Calderdale. I would like to draw the inspector's attention to the routine way in which this area of Calderdale experiences flooding, and the far-reaching ramifications this has on residents. Elland Bridge was destroyed in the Boxing Day floods of 2015. This resulted in a very costly rebuild, a rebuild which took over a year, causing significant disruption to residents of Calderdale. The traffic problems we encountered, the effect on air pollution, the financial cost to the council as well as local businesses was a well talked about issue within the area. It was a disaster. I was shocked to hear of the development proposed in Greetland, because anyone who knows the topography of the area knows what effects a development here will have in terms of how it will further add to the flooding issues we face in the immediate area and further downstream. I can find no reference to effective flood mitigation anywhere in the site reports. The council has spent millions of pounds on flood defences, which have not prevented flooding in other parts of Calderdale. Calderdale is prone to flooding. We regularly walk on the public right of way running the stretch of the proposed development, and we have seen first-hand the extent of flooding in this part of Greetland. When the homes on Woodfield Drive are flooded due to the development, this will affect insurance premiums for others too. The Council has identified the land as being at risk of flooding, the residents have provided proof of the extent of the flooding, there is no justification in land drainage terms to allow these sites to be developed. The NPPF is clear that, -“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk"The council has not adhered to this policy. Part of Site LP0177 lies within flood zone 3A ; the highest classification of flood risk in terms of land that could potentially be considered appropriate for development. The zone 3A is immediately adjacent to the western and southern boundaries of Woodfield Drive. The land immediately adjacent to the whole southern boundary of 3 proposed allocation sites is also allocated as flood zone 3A. However, I ask the inspector to look at the photographs I have attached to my objection, as these provide a visual of how this land actually floods in reality. Whole fields become waterlogged, water flows on these fields at a considerable pace. Drystone walls act as dams, slowing down, but certainly not stopping the huge volumes of water. These sites were previously removed from the plan. The council needs to look at new sites, not simply re-enter sites that have previously been removed for good, valid reasons. Sufficient testing has not taken place. Public Right of Way As I have mentioned in my comments regarding flooding, my wife and I regularly use the public right of way which stretches along the development. The tranquil setting of this public amenity provides us with a space to exercise in a clean, safe environment. Paragraph 98 of the NPPF clearly states that Planning policies and decisions should protect and enhance public rights of way and access. The site report for LP0177 acknowledges the importance of the recreational value of the Black Brook area, which residents of Calderdale would agree with, as was evident on the recent protest

walk, which was covered by both local and regional press, both before and after the walk. Over 300 residents participated in the walk, even though it was held on the weekend of Storm Denis. If the proposed development is allowed to go ahead the residents of the immediate and surrounding areas will lose access to this public amenity as it will lose its tranquillity and be no longer fit for purpose as it will become closed in and unsafe to use. To close in the public right of way is in direct opposition with the National Planning Policy Framework. The NPPF states that the Local Plan should create safe accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion. Traffic Issues and Air Pollution The drastic increase in traffic and air pollution is not referenced under the constraints of this development. However, this is a very important constraint of the proposed development. The traffic lights at West Vale already experiences a considerable backlog of traffic. The pollution in the air can be tasted and smelt. I'm afraid I cannot provide you with a more scientific assessment, as the site report states that the cumulative traffic impact is being assessed. This is a major issue not disclosed in the consultation document. Due to the existing issues West Vale faces with traffic congestion and presumed air pollution, a traffic report is required, along with a Travel Plan and operational assessment of local road networks. The land put forward for the Local Plan, in Greetland, has been done so without an operational assessment of the local road network. Please acknowledge receipt of this objection.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5609805

Comment ID **HRU1480** Site ref (if applicable): **LP0026**

Person ID: **1243981** Name: **Mr Michael Ashton** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Flooding Given that the land is not only identified as being at risk of flooding but is also evidenced as having flooded, there is no justification in land drainage terms to bring the sites in Greetland forward for housing. Paragraph 155 of the NPPF clearly states that, -“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk"In putting these

sites forward the Council is ignoring the policy requirements of the Framework. Green Belt The Green Belt Review was carried out in 2017, the reference numbers are 065 and 339. The conclusion of this review was that all of the sites performed strongly in terms of their Green Belt function, meeting at least 3 of the 5 purposes of including land in the Green Belt. Those 3 purposes were: To prevent neighbouring towns from merging into one another; To assist in safeguarding the countryside from encroachment; To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The Green Belt Land is classed as Most Sensitive. The 0952 allocation was also considered to meet a further purpose in terms of checking the unrestricted sprawl of large built up areas. We would argue that all of the sites should be considered to serve this same purpose, it makes no sense for just 0952 to do so, but 0177, 1625 and 0026 not to, given they are all inextricably linked. Development of all sites would result in the unrestricted sprawl of the large built up urban area of Greetland. The site assessment reports carried out ahead of the consultation on the Local Plan Publication Draft in 2018 concluded that the land represented the -“most sensitive Green Belt"? Given this there is no planning policy justification to ignore that impact ; importantly carried out as part of a thorough Green Belt Review of the borough just over 2 years ago ; and now consider the sites suitable for allocation for housing. Such allocation would conflict with key purposes of including land in the Green Belt and would have a fundamental adverse impact on the openness of the Green Belt. We do not see that the council is able to substantiate their claim that the aspirational growth for Calderdale is achievable, as this would set an economically low achieving council as able to surpass the trends for economic growth seen nationally. There is no explanation for this. Calderdale will end up with a surplus of houses and a shortage of Green Belt land. Other Issues The site assessment reports carried out in advance of the 2018 Publication Draft identified other areas of policy conflict ; in particular heritage, open space and sustainability. It was at that time recommended that none of the sites should be allocated until an assessment had been made of the heritage impact. To our knowledge that has not occurred, as we see no evidence of this in the site reports. The sites were identified as providing valuable natural and semi-natural open space. This would be lost if the sites were allocated for housing. The land is particularly important to the residents of Greetland, which can be seen in the photos attached of the pressure group protest walk. The public right of way is used by the vast majority of the local residents, and even Calderdale residents from further away. This public amenity is highly important for the purposes it serves within the community, and should not be taken away or made unsafe to use, just to fulfil an unsubstantiated housing requirement. In terms of sustainability, a negative factor in not bringing the sites forward in the 2018 consultation was the distance to a railway station (in excess of 2kms). By definition that negative factor remains and forms part of the reason why other potential sites in the area have not been brought forward (such as site LP1089 on Rochdale Road). There are other sites within Calderdale as a whole that better fit the criteria of sustainability. Not all of the possibilities have been sufficiently explored. Conclusion All of the reasons why these sites were not brought forward at the Publication Draft stage remain just as relevant now. There has been no further assessment of any of the significant constraints which resulted in the sites being filtered at that stage. The only reason for bringing them forward for allocation now is based on a simple exercise of responding to a requirement to increase the housing supply. There is no justification for allocating these sites given the flood zone allocation and evidence of flooding, and given the fundamental conflict with the Green Belt Review in 2017. No consideration has been given to the potential to bring forward other sites in the area that do not carry these fundamental problems. No consideration has been given either to the lack of infrastructure available in Greetland to accommodate such a significant level of new housing. We hold great hope that upon being presented with a more rounded view of the facts surrounding the development in Greetland, the inspector will be able to make a fair decision regarding this matter.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

The process has not been simple or straight forward, as it is supposed to be. Finding information has been

difficult, and I do not believe that all members of our community will have been able to partake in the consultation, which is not fair.

Suggested Modifications:

Remove this land from the Local Plan, and reassess the housing requirement. Alternatively, consider less sensitive, lower risklandelsewhere in Calderdale. It appears that Calderdale is allowing developers to dictate where they would most like to build houses based on house prices, or profit, in the area, rather than the sustainability of the land. We have been advised that the density of development could be increased in the more sustainable proposed development in the Brighouse area, as this would result in a decrease in the release of Most Sensitive Green Belt land, especially like the type of unsustainable land proposed for development in Greetland. In short, there are a number of different options to follow before this land should be even considered.

Comments:

Additional Evidence Link:

Comment ID **HRU1484** Site ref (if applicable): **LP0026**

Person ID: **1243945** Name: **Miss Jody Littley** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Calderdale Council have failed to adequately ensure that residents effected were made aware of the proposals. Residents have not received any communication from Calderdale Council regarding these plans.

Do you consider the plan to be Sound?: **No**

Sound Reason:

The Green Belt land should be preserved at all costs and should not be built on unless there are exceptional circumstances. Calderdale Council have not provided any evidence of exceptional circumstances. They say they want to build affordable housing - there are plenty of empty houses across Calderdale (how about these are filled first before thinking about building anymore), they are also plenty of non green belt sites that can be built on so build on those! The CPRE state "The development of brown fields sites should be a priority; there are more than enough brown field sites to fulfil the requirement without having to encroach onto Green Belt". This is not sustainable - there is not enough infrastructure to support the existing residents. Doctors surgeries, schools, dentists etc. are all full to capacity. The roads are incredibly busy - the traffic trying to get into West Vale via Rochdale Road, Saddleworth Road and Stainland Road is atrocious especially at peak times. The roads simply cannot cope with anymore cars. These roads turn into car parks with traffic in West Vale back upped by Greetland Academy on Saddleworth road. I'd urge you to travel on these roads at peak times to understand how bad the situation is now and think about how an extra 1000cars would create a huge negative impact on this. This site in the existing Green Belt should be removed from the Plan as the exceptional circumstances for its release do not exist. Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: (i) to check the unrestricted sprawl of large built-up areas (ii) to prevent neighbouring towns merging into one another (iii) to assist in safeguarding the countryside from encroachment (iv) to preserve the setting and special

character of historic towns (v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. It does not conform to Central Government Policy;it does not conform with current legislation with regard to building on flood risk areas. If you build on the Green Belt you are endangering lives by taking away the much needed natural flood defence which soaks up a lot of rain water. If this land is built on it will have a catastrophic impact on the flooding that already exists. On the 9th of February this proposed site was completely flooded. I dread to think what will happen if this land is built upon. If you build on the Green Belt you are endangering people's lives, you can't mitigate that. A poor woman in Wales lost her life due to the floods, it seems like Calderdale Council are not concerned about the welfare of the residents and are quite happy to endanger their lives if it means they get money from developers. If you take away the Green Belt you will take away the habitat of the wildlife. Where are they supposed to go? The Green Belt is supposed to help protect our wildlife and sustain our ecosystem. The proposed development of the Green Belt will increase the noise and air pollution levels. Calderdale Council recognises that climate change is a huge issue but are actively wanting to add to the problem. Where is the evidence from Calderdale Council to prove that this plan is justified?

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

See above.

Suggested Modifications:

Remove LP0026 from the plan and build on brownfield sites if necessary.

Comments:

Additional Evidence Link:

Comment ID **HRU1490** Site ref (if applicable):

Person ID: **1244004** Name: **Ms Victoria Myers** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

It is not protecting green belt land and ensuring brown field sites are developed first. Out of date information, figures need revisiting post brexit and eonomic growth forecasts, and specific for the local are not based onLeeds. I do not believe this plan complies with the National Planning Policy Framework, in particular section 13. Protecting Green Belt Land A strategic attempt has been made to divide opposition of sites within Greetland, therefore my comments and objections are the SAME for all 4 sites proposed for development, as essentially they are all facing the SAME constraints and will have the SAME detrimental impact on the locality, for reasons I shall state below.

Do you consider the plan to be Sound?: **No**

Sound Reason:

The infrastructure, in respect transport, highways, education, and medical needs are totally inadequate for any development proposed of this scale. Because there are many other areas including Brownfield sites

within Calderdale which have not been considered for inclusion in the in the Local Plan, it smacks of discrimination. Complete disproportionate amount of building proposed for in this area. The revisions to the local plan (when the 4 sites off saddleworth road were added, AFTER the plan was agreed and supported by local councillors)proves further unsustainable development with a disproportionate amount of new homes proposed across four sites in Greetland with over 60% proposed in the Elland area. I might also add that it is evident and has not gone unnoticed of the massive proposal to buildis in non Labour majority wards. The biggest area for concern is the flooding - not a flood risk as we have seen in 2015 and most recently only in February 2020 the areas are flood plains. Natural springs, even streets and lanes are named after them for a reason! It is not rocket science to get the link between the steep sided hills all around Greetland, surface water will and does pour down the roads and these green field sites do their job to help limit the flood effects, protecting the nearby houses and when the Black Brook can cope, off it goes into the river and on to West Vale, Elland, Brighouse..... If this water has nowhere to go it will have serious detrimental effects not only to the people living in existing and new houses but the wider areas mentioned above as they will flood even worse and more frequently, as a risk to life and certainly detrimental impact to highways and bridges and people being able to get about to do their jobs. The further addition of possibly 1200 cars (2 per household) will increase air pollution and the proximity to the local infant school will have health effects on the children, when we're already facing an unprecedented increase in childhood asthma. The plan was based on housing Requirement to support the economic growth plan. This country has just seen its biggest change in 47 years, Brexit! The plans are not current and not compliant. Economic growth should be called for review! The housing need was calculated in 2016 which will be significantly reduced in Brexit Britain! Wildlife corridor - Currently the valley enjoys the presence of; deer, herons, squirrels, foxes, and other wildlife to the benefit of residents. Final point, The Council should consider increasing the density in the Brighouse building sites, and the CPRE has made this suggestion.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

I have found that Calderdale's publicity surrounding these proposals to have been somewhat limited, and lacking in ensuring complete openness, and robust attempts at consultation with the community. I found it underhand that the local plan was set and agreed and voted on in council in 2018 and then somehow these 4 sites, a not insignificant 600 houses were added in - on a technicality that Councillors agreed to allow small changes without a revote (simplified wording). Is there been any evidence of cross boundary cooperation in meeting the housing needs??

Suggested Modifications:

Brown field sites must be exhausted first before building on green belt land and creating urban sprawl

Comments:

Additional Evidence Link:

Comment ID **HRU1495** Site ref (if applicable): **LP0026**

Person ID: **1243914** Name: **Mr James Travis** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

The LPA failed in publishing the SAR at the point the plan was published, this has already been pointed out to the LPA and Program Inspector representatives and whilst this is now corrected left a min 6 week consultation to now being 4 weeks. This evidence has already been shared with the LPA and it's failure admitted, but remains an open issue. An extension of time should be applied to correct this error and currentlytests compliance with the T&CP Regs 2012 Sec 18 / 19.

Do you consider the plan to be Sound?: **No**

Sound Reason:

I am very supportive for the need to plan for our future,when the right decisions are being made for the right reasons. However, saturated planning proposals in the Saddleworth Road corridor do not appear to have been well-thought-out against the wider holistic context of the T&CP Regs 2012 Sec 10 (c) (i) or the NPPF. Note Legal comments previously also relate here to NPPF Sec 3.16 (e) relative to plan making accessibility. As a consequence, poorer performing sites, now redacted have resulted in LP0026 being re-considered but without sound justification as to why. I would assert that had the LP not flip-flopped in its approach and had the approach (in line with the NPPF - for example Sec 3) taken a systematic one, more suited, higher %'s of small/medium sized sites wouldnow be selected and be more deliverable with a footprint that is dispersed across the CLP with a lower impact to Green Beltwithless uncertainty relative to site appraisal assessments than LP0026. In-turn this would also encourage local building companies to engage, who have a local knowledge and who can offer jobs within the surrounding local community and LBC's, rather than buy-in resource (via largernon-localcompanies). Sustainability Appraisal Soundness SA SAS Objective 1 ; developers would want to maximise ROI and plan for upper value housing in keeping with surrounding housing, should be negative. SA SAS Objective 2 ; Safety (narrow roads) is already an issue (not a risk) for pedestrians and road users ; this development would exacerbate this not improve. This issue has been reported numerous times / multiple and significant insurance claims made and damage to public / private transport as well as damage to walls and property recorded. Should be negative. SA SAS Objective 3 ; 0-15 Min town centre is very overly optimistic and requires re-assessment. Most conservatively 15-20 mins non rush hour / 20 ; 60 mins rush hour. Should be negative. SA SAS Objective 4 ; given the site is already used for leisure activities (walking / right of way / corridor to protect pedestrians form traffic / school projects / cyclists as examples) re-assessment is required and should be negative. SA SAS Objective 6 ; compromises a historic environment (18 th c footpath) lined by TPO's Trees. Should be negative SA SAS Objective 7 ; surface water flooding is already an issue any development would result in an increase of this / not reduce it ; note recent flooding site information submitted to CMBC Flood Risk Team Feb 2020. Should be negative. SA SAS Objective 8 ; 0-15 min public transport journey to a town centre is factually incorrect (for inbound and outbound journeys) and not frequent. See bus time tables https://bustimes.org/services/343-huddersfield-halifax. Should be negative. SA SAS Objective 9 ; Bats, Newts, Herons, Deer as examples are all seen benefiting this site, this development destroys and does not protect. Should be negative. SA SASA Objective 10 ; pollution can only increase with a higher population density and removal of trees that improve carbon footprint ; should be a negative. SA SAS Objective 11 ; This site is used as agricultural land all year round; this site should be negative. SA SAS Objective 12 ; urban sprawl is the objective if planning proceeds vs protection to enhance natural landscape, this seems like a contradiction and should not be uncertain ; this should be negative. Note current agricultural use combined with harmonised use of recreational activities associated with this site. SA SAS Objective 13 ; Agree and by implication supports other negative reasoning SA SAS Objective 14 ; this is a relative objective, however, as this is not sheltered and, in an area, where prevailing wind / weather cool buildings more readily this could be determined negative due to cost to heat / insulate property in order to protect a zero-carbon policy. On this basis negative. SA SAS Objective 15 ; good opportunities of employment are found along the M62 corridor, logistically this would be more sustainable if development was closer to major road links. Typically, time to travel to the motorway (M62) is 10-15 mins (at busy times) from this

site which would reduce the opportunity for young families that needed to work in say Manchester or Leeds. This maybe a negative subject to interpretation. SA SAS Objective 16 ; I don't see why this is NA? The lands current use could be developed / supported further in its current agricultural or recreational use. Workers from many businesses adjacent use this field for walks at lunchtime. For people / owners that want to promote a healthy work life balance this is a positive factor and a pull in their employment. SA SAS Objective 17 ; this site is not 0-15 journey time to town centre, based on further commentary this reads like a negative but has been found to be uncertain, based on my reading this should be negative since there are no retailers anywhere near this site. Conclusion ; Uncertain 0 ; Negative 17 ; Positive 0 (subject to re-evaluation). CLP Habitats Regulations Assessment Given the inclusion of the Calderdale Way, this should include North Dean Nature trail (ancient woodland) there is an omission and need to recognise the location start at Clay House which attracts many walkers / events (charity walks / orienteering / mountain biking as examples from all over this region as well as North Yorkshire / Cumbria Cheshire and further afield ; note the orienteering event 24/02/20) which contribute to Calderdale's natural / visitor attractions ; I feel that to only recognise Stoodley Pike as important, we should not forget that this important route begins in this area and as a site of historic value (Clay House) should be included within the SPA / SAC. In-line with this, i would request that LP0026 be removed from this plan and other more suitable sites be re-evaluated and every effort made to ensure "the plan" when ready, meets the objectives necessary for the Local Plan to be deliverable against objectives (must be fit for purpose) and that this does not compromise Green Belt, infrastructure need, flooding risk, amenities, zero carbon objectives and ecology unnecessarily which appears to be the direction of travel the LP is taking for this site. Whilst also squeezing the ROI% for any incumbent developer due to over saturation in this area and complexity / acknowledged high degree of uncertainty associated with it. LP Site Assessment Reports Flooding ; conclusions made on suitability before a full and proper evaluation has been completed, increasing risk. Given local stratigraphy ground as well as surface waters are factors, see Flood Risk assessment data for this site Feb 2020 provided to CMBC. Also note complex drainage that dates back pre-1850's which is a further significant risk factor (issue currently) and would increase complexity of any development (and cost) as well as compromise what is already a flooding asset (note EA GIS data as published on .Gov EA website. For the SAR to assert an open-ended mitigation strategy is not best practice, is not acceptable or accepted. Flood RAG = Red Road and Site Access RAG ; no local combined (Saddleworth Road corridor) assessment has been carried out like other areas. As many accounts demonstrate this is already an issue to Saddleworth Road and local accounts of Scar Bottom Lane demonstrate this is already an issue (note 20mph restrictions on Brian Royd Lane) and given dry-stone walls / need to buffer practically speaking cannot be mitigated against and so would increase this issue and further risk threat to the public. Is also compromised by LP1407 development and has not been considered holistically here. Road and Site Access RAG = Red Ecology ; this is already compromised relative to the upper Scar Bottom Lane (LP1407). Green RAG should only be asserted where positively identified and given the wider proposals / public responses to this loss I am at a loss as to how this site performs with no impact when evidence to the contrary has been demonstrated. Ecology RAG = Red Historic Env ; the path from the Mill / listed building is preserved by the line of Tree's that are TPO'd and can be seen on pre-1850 maps. Development has already impacted this area and further development risks this further and so I cannot agree with the comments or conclusions made here. Historic Env / Conservation RAG = Amber / possibly Red Housing Services ; objectivity within these comments are not sustained and conclusions at best would be uncertain. Based on housing need this can be met elsewhere with lower impact and as a result I would suggest this is more negative Housing RAG = Red Business Service ; if not relevant why assert a green RAG. Business Service = N/A Minerals ; assessment pending and I would agree a risk based / bias balanced view has been taken. Minerals RAG ; Amber EH ; quite how noise and pollution can be mitigated against is silent in this assessment or at what cost. EH RAG ; Amber ; potentially Red Other ; site Boundary RAG % is not effectively acknowledged, rather than 1-2 sides it should show (to be representative) <25% (RAG Red). Physical constraints ; the overall site has varying degrees of slope declination ; up to 30%. This is not gentle and is misrepresented (RAG Red). Accessibility - congestion of >150m in length is a daily issue and regularly >500mat the West Vale cross roads - noting

Gov Transport guidelines on this. Distance to bus stop - >1km to nearest regular service RED RAG Distance to Rail ; RED RAG Open space ; Greetland Community Centre / Recreation Area parking is >600m distance RED RAG Journey Time to Town Centre ; more than 15mins (non-rush hour) more than 30 mins rush hour) ; RED RAG Journey Time to shops ; less than 15mins outside of rush hour ; Green RAG (subject to definition of day-day) Journey time to hospital ; Amber RAG given although 60 mins suggests life at significant/elevated risk as a result and when modelled in the context of other development (Greetland Corridor) would presumably be >60 mins at certain times of the day - this in not acceptable. Should be red RAG. GP ; >15 mins subject to availability and at what time of day ; Amber RAG. School ; less than 15 mins subject to availability ; Amber / RED RAG given school is full. Secondary education ; RED RAG in context of bus services. Primary employment aligns with journey time omments above and>20 mins ; Amber or RED RAG and does not put people, places and community at the heart of a zero-carbon policy. GreenBelt As commentary demonstrates this site performs very well against objectives. Many other sites excluded perform less well and should be re-considered. Deliverability Development saturation is proposed(on current plan in Greetland) and already included (LP1407) ; this will have a deliverability impact on the local plan and how / when this is implemented will be delayed to ensure developer ROI. Denser housing / close to infrastructure and local centre's should be more positively weighted to reduce GreenBelt impact.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

I note the most recent version of the DtC is now over 1 year old and from reading some of this, outcomes of meetings (Table 2) in the main are "ongoing" rather than closed / determined and whilst i could see matters will evolve over time that is not a reason to record objectives achieved. This is just one example of a list of open ended items within this document and would suggest a review / update as a minimum. A further concern, relative to recent events is that level 2 SFRA was not recommended in Aug 2016 as a follow on to Level 1 being "acceptable" especially given more recent flooding events. In addition, A further issue - related to the above see CLP 7.3 Reg 19 (Cabinet Doc - 11th June 2018) - "the Council must make a copy of all of the proposed submission documents and a statement of the representations procedure available via their website" which is has not been achieved. Of similar concern is the openness of health care engagement and as many have commented the already existing strain place on health care. Clarity is required and the DtC document (2019) leaves this critical topic open. It's also noted thatLeeds City Region Statement of Common GroundAugust 2018 has 6 signatures missing.

Suggested Modifications:

i would request that LP0026 be removed from this plan and other more suitable sites be re-evaluated and every effort made to ensure "the plan" when ready, meets the objectives necessary for the Local Plan to be deliverable against objectives (must be fit for purpose) and that this does not compromise Green Belt, infrastructure need, flooding risk, amenities, zero carbon objectives and ecology unnecessarily which appears to be the direction of travel the LP is taking for this site. Whilst also squeezing the ROI% for any incumbent developer due to over saturation in this area and complexity / acknowledged high degree of uncertainty associated with it.

Comments:

Additional Evidence Link:

Comment ID **HRU150** Site ref (if applicable): **LP0026**

Person ID: **1239041** Name: **James James Waddington** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

I wish to object to the above mentioned references of the Calderdale Local Plan. Please see considerations for objections below: - Effect on local roads will be significant. West Vale and Greetland are at breaking point at peak times and during the day. The proposed amount of housing will only add to the currently strained local roads. In order to accommodate the amount of houses a significant redesign of the local roads will be required, including the deomoiiton of a portion of west vale. I ask have you been to West vale at rush hour? - Effect on local wildlife. The proposed plans are to be built on a wildlife corridor. This includes a healthy marine biodiversity of the black Brook, including dippers, herons and brown trout. Housing on this land will have a significant impact on the diversity of the land. None marine wildlife including bat's, foxes and deer are also present - effect on local facilities. Doctors and additional amenities are already stretched due to the closure of additional local facilities in towns such as Sowerby Bridge. Housing to this proportion without additional facilities is unimaginable - effect on the water table. In 2015 significant flooding was caused to the Calder valley including elland. The proposed sites sit upstream from a small channel waterway that passed through the centre of west vale. Significant flooding will occur to property and business if the plans are to go ahead. Calder Council is building additional flood defences throughout the valley, however, there is no consideration for the removal of flood plains - there is no consideration for the building on brown field sites. I hope will keep me updated on the progression of these plans.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1512** Site ref (if applicable): **LP0026**

Person ID: **1243993** Name: **Miss Ann Wickens** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Insufficient information or time given to local population to review and comment on plan

Do you consider the plan to be Sound?: **No**

Sound Reason:

That the local plan does not take into consideration uniqueness of area and risks These being propensity to flooding from surface water from surrounding area and local springs These areas acts as natural flood plan/ soak aways and if disregarde will cause severe flooding impact on local existing housing and infrastructure The area hosts an natural environment for wildlife which will be disrupted with the proposed building Increased Light pollution will affect wildlife such as owls bats and other nocturnal creatures The Air quality of our area will be detrimental to health with size of build and relative car owners Resaerch has already linked this to health of children but also higher risk stroke and cardiac disease in elderly

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

The proposed plan railroads over local populations fears of risks to health and infrastructure inability to cope with increases load ie hospital schools and roads

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1543** Site ref (if applicable): **LP0026**

Person ID: **1244121** Name: **Mrs Anna Sladdin** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

From my understanding from NPPF Paragraph 143 only in 'very exceptional circumstances' may permission be given to build upon green belt land and also once all brown field sites have been exhausted. I do not believe that the council have exhausted the search for brown field sites in Calderdale and as such it would be unjust to see the Greetland green belt as suitable for building in this case. This green belt area in Greetland is also preventing 'urban sprawl' which is vital for villages to maintain their boundaries and have open green space which the Government continue to promote and cite as beneficial to communities for physical and mental health and well being. Furthermore although desirable to a developer due to location, outlook and affluent area, the four sites proposed in the Greetland (LP0177, LP0952, LP1625 and LP1635) area are not suitable for the amount of housing development proposed for a number of reasons. Greetland is a village built in a hillside with a brook running through the bottom. The majority of the green belt land for consideration is on the edge of this brook - a brook that is more and more often flooding due to increased surface run off from the hillside which is already predominantly built upon. As it stands, the areas marked as green belt land at the side of Saddleworth Road in Greetland is just about managing to

absorb all the surface run off water from the tarmac and overflowing springs in the local area on 'regular weather days' but over recent weeks there has been more examples of extensive flooding to all four of these sites as a result of what once could have been termed 'freak weather conditions' but as climate change is upon on us, these instances are more common occurrence (as demonstrated by Storm Ciara and Storm Dennis in Februray 2020 alone). Building on these four plots in the bottom of the valley would not provide this vital wash land and would contribute greatly to more serious flooding to our area which has seen extensive devastation through West Vale, Elland, Sowerby Bridge, Mytholmroyd and Hebden Bridge to name only a few towns/villages in Calderdale that have been affected. In addition to the significant flooding certainty which has already been causing problems to local residents without the 600 additional houses being built, I have serious concerns for the lack of suitable infrastructure to deal with such a build. It can be safely assumed that each new house will come with at least one, if not two or three vehicles per household. There are two roads running through Greetland, both of which are significantly congested causing queuing traffic past the school and pre-school on occasion through rush hour traffic. As well as Saddleworth Road and Rochdale Road being the main routes into the larger towns and to the motorways for commuters from Greetland, they are also the sole routes for residents from surrounding villages of Barkisland, Norland and Krumlin and as such, a further 600-1500 cars on this road will cause increased traffic congestion and pollution which is of additional concern as this will be next to the schools and pre-schools where our children play out and breath in these toxic vehicle fumes. I understand that the sewerage system which also running parallel to the brook is already full to capacity and at times overflowing in to the brook. How will a further 600 houses impact upon this system - I believe the answer is that it will be unable to cope and subsequently flow into the brook further polluting the water and causing damage to wildlife in the local area. I have already mentioned the school. Greetland Academy is at full capacity and oversubscribed most (if not every) year(s). I am aware that there is no capacity to extend the school therefore the proposed housing development will further put pressure on school places and expect further commuting to schools further afield for Greetland residents, further adding to the traffic congestion and pollution already mentioned.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1549** Site ref (if applicable): **LP0026**

Person ID: **1128267** Name: **Powers** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

See attached comment.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610108

Comment ID **HRU1566** Site ref (if applicable): **LP0026**

Person ID: **1244127** Name: **MR ROBERT CROSSLAND** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

The Calderdale Local Plan fails to address the requirements of National Planning Policy Framework, in particular paragraph Para 177 and the associated PPG in the Sustainability of Greenbelt Sites. NPPF Para 143 in respect of 'Proposals affecting the Green Belt' states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' These very special circumstances are non-existent in respect of the LP0026 site. The proposed development, if permitted will be detrimental to and destroy the character of the locality. The site with the narrow tree-lined stone walled lanes (Brian Royd Lane and Scar Bottom Road) fields, farmhouse, coach house, ponds, mill and reflect the historic character of this locality. The site and its environs is more than just a -“field"; it is intrinsic to local heritage. The proposed mitigation (retaining stone walls and trees where possible) offers insufficient and only token protection. The proposed allocation does nothing to promote the vitality of the main urban areas, indeed it will have a detrimental effect on the surrounding roads which are already congested and at peak times gridlocked. Bus services are poor (the last 343 bus from Huddersfield departs at 16:20) the local shops (West Vale) are not within walking distance hence it is reasonable that future occupiers of the proposed site will resort to using private cars as their principal means of transportation. Undeniably the majority of occupants will commute to neighbouring towns and cities ; Halifax, Huddersfield, Leeds, Bradford and Manchester and, as such, adds no special reason as to why this particular site should be earmarked for development when other -“commutable"and less sensitive sites are available elsewhere. The proposed allocation fails to recognise the intrinsic character of the countryside and neglects to protect green belt aor to conserve and enhance the natural environment. In particular: The site is currently and regularly used for agricultural purposes (sheep and occasionally cattle grazing) The site is a haven for wildlife in particular, bats, birds (including owls), rabbits, moles, other small mammals and occasional deer. Bats and owls are regularly seen and heard late evening and are associated with the trees in the centre of the field and at the side of Brian Royd Lane and Scar Bottom Road. Development on the site will not only disturb the habitat, introduce noise and light pollution but also affect the supply of small mammals and insects upon which they depend. As such the proposed allocation does not comply with the objective to utilise land of lower environmental value. Calderdale Council have already declared a -“Climate Emergency"as approved by full Council on 30 January 2019. The Council are

through this motion committed to reduce carbon emissions, reduce flooding and extinctions of plant, insect and animal species. The proposal to develop this green-field site LP0026 goes against the Council's own objectives. The hillside surrounding site LP0026 is riddled with springs, watercourses, land drains and culverts. Some of these feed mill ponds, drinking troughs and streams. Following periods of moderate rainfall, water can be seen discharging from numerous locations on the hillside. Currently the field LP0026 acts as a buffer absorbing large quantities of this water which eventually permeates through the ground to Black Brook. During periods of heavy rainfall the dip at the bottom of the field "ponds" and prevents water flooding over onto Saddleworth Road. In addition to the site itself suffering from -"flooding" issues, any future development of this site will therefore reduce the capacity in the locality for buffering rainwater runoff from the hillside. Furthermore any hard surfacing of the ground (roads, drives, roofs etc.) will put additional pressure on the overloaded drainage system which often sur. This is likely to result in: Worsening of flooding which is already evident on the site: Further overloading of the drainage system which already surcharges following periods of moderate to heavy rain Reduced buffering and storage of ground water resulting in additional pressure on Black Brook and the River Calder. There have been numerous flooding incidents associated with the River Calder downstream at Park Road, Elland; Brighouse and beyond (Mirfield, Dewsbury). Increased emphasis is being directed at the management of rainwater in upstream catchment areas. The proposal to develop site LP0026 is detrimental in this respect. The proposed allocation will increase rather than reduce pollution. Being a field with trees within green belt, the site currently has little light or noise pollution which is one of the reasons for the diverse wildlife (see 3b above). The proposed allocation will result in increased light and noise in the locality The hard surfacing of green belt land will reduce capacity for CO 2 uptake by plants and trees. Importantly, the associated traffic will increase air pollution particularly at traffic hotspots ; West Vale, Salterhebble, Ainley Top. Loss of Public Open Space The field LP0026 is crossed by a public right of way from Brian Royd Lane to Brian Royd Mills. This offers a pleasant and safe diversion from walking alongside the narrow lane and the, at times, busy Saddleworth Road. The field is also used by local children for sledging and recreational purposes. Development will destroy this experience for future generations.

Do you consider the plan to be Sound?: **No**

Sound Reason:

The Calderdale Local Plan fails to address the requirements of National Planning Policy Framework, in particular paragraph Para 177 and the associated PPG in the Sustainability of Greenbelt Sites. NPPF Para 143 in respect of 'Proposals affecting the Green Belt' states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' These very special circumstances are non-existent in respect of the LP0026 site. The proposed development, if permitted will be detrimental to and destroy the character of the locality. The site with the narrow tree-lined stone walled lanes (Brian Royd Lane and Scar Bottom Road) fields, farmhouse, coach house, ponds, mill and reflect the historic character of this locality. The site and its environs is more than just a -"field" it is intrinsic to local heritage. The proposed mitigation (retaining stone walls and trees where possible) offers insufficient and only token protection. The proposed allocation does nothing to promote the vitality of the main urban areas, indeed it will have a detrimental effect on the surrounding roads which are already congested and at peak times gridlocked. Bus services are poor (the last 343 bus from Huddersfield departs at 16:20) the local shops (West Vale) are not within walking distance hence it is reasonable that future occupiers of the proposed site will resort to using private cars as their principal means of transportation. Undeniably the majority of occupants will commute to neighbouring towns and cities ; Halifax, Huddersfield, Leeds, Bradford and Manchester and, as such, adds no special reason as to why this particular site should be earmarked for development when other -"commutable" and less sensitive sites are available elsewhere. The proposed allocation fails to recognise the intrinsic character of the countryside and neglects to protect green belt aor to conserve and enhance the natural environment. In particular: The site is currently and regularly used for agricultural purposes (sheep and occasionally

cattle grazing) The site is a haven for wildlife in particular, bats, birds (including owls), rabbits, moles, other small mammals and occasional deer. Bats and owls are regularly seen and heard late evening and are associated with the trees in the centre of the field and at the side of Brian Royd Lane and Scar Bottom Road. Development on the site will not only disturb the habitat, introduce noise and light pollution but also affect the supply of small mammals and insects upon which they depend. As such the proposed allocation does not comply with the objective to utilise land of lower environmental value. Calderdale Council have already declared a -“Climate Emergency"as approved by full Council on 30 January 2019. The Council are through this motion committed to reduce carbon emissions, reduce flooding and extinctions of plant, insect and animal species. The proposal to develop this green-field site LP0026 goes against the Council's own objectives. The hillside surrounding site LP0026 is riddled with springs, watercourses, land drains and culverts. Some of these feed mill ponds, drinking troughs and streams. Following periods of moderate rainfall, water can be seen discharging from numerous locations on the hillside. Currently the field LP0026 acts as a buffer absorbing large quantities of this water which eventually permeates through the ground to Black Brook. During periods of heavy rainfall the dip at the bottom of the field "ponds"and prevents water flooding over onto Saddleworth Road. In addition to the site itself suffering from -“flooding" issues, any future development of this site will therefore reduce the capacity in the locality for buffering rainwater runoff from the hillside. Furthermore any hard surfacing of the ground (roads, drives, roofs etc.) will put additional pressure on the overloaded drainage system which often sur. This is likely to result in: Worsening of flooding which is already evident on the site: Further overloading of the drainage system which already surcharges following periods of moderate to heavy rain Reduced buffering and storage of ground water resulting in additional pressure on Black Brook and the River Calder. There have been numerous flooding incidents associated with the River Calder downstream at Park Road, Elland; Brighouse and beyond (Mirfield, Dewsbury). Increased emphasis is being directed at the management of rainwater in upstream catchment areas. The proposal to develop site LP0026 is detrimental in this respect. The proposed allocation will increase rather than reduce pollution. Being a field with trees within green belt, the site currently has little light or noise pollution which is one of the reasons for the diverse wildlife (see 3b above). The proposed allocation will result in increased light and noise in the locality The hard surfacing of green belt land will reduce capacity for CO 2 uptake by plants and trees. Importantly, the associated traffic will increase air pollution particularly at traffic hotspots ; West Vale, Salterhebble, Ainley Top. Loss of Public Open Space The field LP0026 is crossed by a public right of way from Brian Royd Lane to Brian Royd Mills. This offers a pleasant and safe diversion from walking alongside the narrow lane and the, at times, busy Saddleworth Road. The field is also used by local children for sledging and recreational purposes. Development will destroy this experience for future generations.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Remove site LP0026 - retain as green belt with TPOs in place to safeguard trees

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610142 ; http://calderdale-consult.objective.co.uk/file/5610139 ; http://calderdale-consult.objective.co.uk/file/5610125

Comment ID **HRU1569** Site ref (if applicable): **LP0026**

Person ID: **1242247** Name: **mr Michael Clarkson** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

green belt and flood plain.

Do you consider the plan to be Sound?: **No**

Sound Reason:

I understand the need for affordable housing was calculated in 2016,hence these figures for affordable housing is out of date and will be significantly reduced Brexit Britain!!!! Not only is it green belt land,it is a flood plain and in a red flood zone full of streams and springs and building development is an open invitation to guaranteed floods elsewhere. Another major issue is the insustainability of extra traffic,already because of extra building in Barkisland and Ripponden traffic all converging at West Vale,i live up Greetland and most times of the day it is busy driving to West Vale and at most times it is very busy and at 3 or 4 times through the day West Vale is literally Gridlocked with back logs of traffic up to the Rose and Crown up Rochdale road and half way to Elland.Extra traffic brings air pollution!! plus wildlife corridor,sewerage,parking, and with 2/3 cars per household @ plans LP 0026/0177/0952 (600 houses) general infastructure,doctors and general amenities!! The extra housing proposed is not only unacceptable but UNSUSTAINABLE!!!

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Greetland has been banded with Elland and Stainland. This is ridiculous and is not a true representation of the situation or the area . Why is this development LP0952, LP0026, LP0177, LP1625,even in the Local Plan when Brownfield sites are available (but been removed) I think that the local community and beyond have been greatly let down by the Council regarding the lack of information they have provided . Surely, every household in Greetland should have had information by post about these plans as the plans for all sites will affect everybody in Greetland ,surrounding areas and other areas in some some way .It is then up to them to object /not object as the case may be .I believe Calderdale Council has not given ALL the community the chance to air their views. I myself would not have known of this plan had it not been brought to my attention by a group on Facebook . I OBJECT to all the sites LP0952, LP0026, LP0177, LP1625 being part of the Local Plan for the following reasons 1. Increased risk of flooding 2 Loss of Greenbelt , open spaces and Urban Sprawl 3. Increased levels of air pollution 4.Schools , Doctors,Dentists 5. Loss of wildlife and habitat 1. Increased risk of flooding Building on this site which has watercourses and springs ...not good for a new development and not good for any existing properties below or next to the site when the springs are diverted elsewhere by the developers The extra pressure this run off will have on Black Brook ,surrounding flood plains and homes will be devastating. On Sunday 16th of February a protest walk was held by members of the community...Starting at the school down to Black Brook (where last week you would have needed a boat.....the fields were totally flooded) ,up Gatehead Lane and back down Saddleworth Road to the school taking in all of the proposed sites, Site number LP0026 ,Site number LP0177 ,Site number LP0952 ,Site number LP1625 .They will have seen the expanse of run off into Black Brook as they had to negotiate their way through it to get to Gatehead Lane. To build on this site could have catastrophic effects for homes and businesses already in this area and further afield. It just doesn't make sense. Climate change isn't going to go away but we can try to slow down the effect by not creating more problems. Do we want this beautiful valley to become another flood disaster, where people who lose everything are expected to just pick up the pieces and carry on with everyday life as if nothing has happened.The effect on a person's longterm mental health and wellbeing must be huge .Don't build on these sites, surely Prevention is better than Cure and and less expensive in the long run .If these developments were to go ahead who would be accountable when problems start arising .....Calderdale Council ??? Developers ? ? ?? Or will they just take their Â£Â£Â£Â£Â£Â£Â£ and run. Does anyone actually care? Can we have answers please ? The DEFRA 25year plan states that "National flood management involves the use of a variety of measures including storing water on open land". NPPF 14 (157b) states that plans should work to safeguard land from development that is required or likely to be required for current and future flood management. The current policy and legislation on flooding states -“due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere. Chapter 14, paragraph 163 of the NPPF states: -“When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere Boris Johnson has thrown housebuilding plans into confusion, by suddenly calling for an end to construction on flood plains. Around 9 per cent of new homes in England are built on land where there is a -“high probability"□of flooding ; and a recent investigation found that 10,000 are currently in the pipeline. On the campaign trail in flood-hit Derbyshire, the prime minister said: -“We've got to stop building on flood plains. We've got to stop building on areas which are vulnerable to flooding. Calderdale Council Planning Department has a duty of care to comply with current policy and legislation on flooding. Housing should not be built on sites such as this. Now is the time to step up ,stop building on flood plains and learn by past mistakes . Stop risking lives. 2. Loss of Greenbelt , open spaces and Urban Sprawl The purposeof Green Belt policy is 'to prevent urban sprawl' and 'to prevent neighbouring towns merging into one another.' The location of this proposed site would go against that ; there would be less clear boundaries between Greetland and Barkisland NPPF Section 13 Protecting Green Belt Land Paragraph 80 of

the NPPF explains that the Green Belt serves five purposes: 1) to check the unrestricted sprawl of large built-up areas (2) to prevent neighbouring towns merging into one another (3) to assist in safeguarding the countryside from encroachment (4) to preserve the setting and special character of historic towns (5) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Calderdale Council, in its own evidence, concludes that this area of Green Belt performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt Brownfield sites should be developed first and sites with better infrastructure links. Avoid development upon flood plains. We are compounding the existing risk by continuing to build on flood plains.The more we pave over natural areas the easier it is for water to move across the land and into the rivers.Why have Brownfield sites been overlooked ? Planning framework states that sites to be removed from greenbelt should only be done so in exceptional circumstances.What are the exceptional circumstances ?.....I can't see any . The proposed development represents a disproportionate amount of new development in Greetland . Now is the time to step up,stop building on Green Belt such as this (which helps store water and protects land below thus helping in the prevention of rivers flooding) and learn by past mistakes. 3. Increased Traffic congestion and air pollution The area has not got the infrastructure to cope with anymore traffic . West Vale is a bottleneck at the best of times .Saddleworth Road ,Rochdale Road ,Stainland Road are usually at a standstill. We've had 4/5 way traffic lights for weeks making the congestion worse than ever. Building these planned sites would be madness. It will be easier to go to Oldham shopping etc rather than sit in traffic trying to get to Halifax. There has been 3 way traffic lights on Saddleworth Road and Scarbottom Lane,whilst Gatehead Lane residents just had to take their chance to go when possible.Saddleworth Road has had a lot of roadworks recently ,is this work that needed doing or is it paving the way for plans which haven't been passed yet? 600 new homes ...1200 plus more cars. I quite often see young children (vulnerable members of society) walking to school either with parents or with the Walking Bus maybe in the hope of getting some fresh air and exercise. Walking past queues of traffic with engines running is not a good way to achieve that. Even at school and pre school in the playground children are at risk from air pollution .1200 plus more cars to add to the queues of traffic that line up outside the school on a daily basis. Air pollution causes heart problems /lung problems and others,is this what we should be doing to our children/grandchildren . A little further down Saddleworth Road is an old people's home...Woodfield Grange (vulnerable members of society) This is the introduction to the Calderdale AIR Quality Action Plan *The main reason for tackling poor air quality is to address its impact upon health and quality of life. Its effects are felt particularly by the most vulnerable members of society such as the very young ,the elderly and those already suffering from other health conditions.It is also damaging to the local economy. Poor air quality can result in loss of working days,reduced productivity,increased absenteeism from school and a drain on national health resources. * This plan should be scrapped. 4. Schools ,Doctors ,Dentists Schools are already at capacity.What effect would it have on children already in the area getting places....would they be the ones having to go to schools elsewhere. Doctors and dentists are working at full capacity. Are you planning on new schools, doctors surgery etc and if so where will all these be built.....on more Green Belt ? 5. Wildlife and habitat Last but not least the wildlife and their habitat would reduce dramatically. In this area there are many species dwelling here, deer,foxes,buzzards,owls,kestrels,herons,bats and lots more. The area is a wildlife corridor which will get smaller and smaller and eventually we will lose the wildlife.Loss of habitat caused by developers who are interested in one thing and one thing only ....Money. Let's hope Calderdale Council do the right thing and scrap these plans. Â

Suggested Modifications:

Scrap these plans LP0026.LP0952 LP0177 LP01625

Comments:

Additional Evidence Link:

Comment ID **HRU1573** Site ref (if applicable): **LP0026**

Person ID: **1244134** Name: **Mrs Amanda Bennett** Organisation: **CEO The Greetland Acaademy Trust**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

There are a great many considerations to be put in place before this plan is viable which include: Flooding Risk Traffic Congestion & Road Safety Infrastructure & Capacity Greenbelt

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610147

Comment ID **HRU1581** Site ref (if applicable): **LP0026**

Person ID: **1243021** Name: **Mrs Laura Palfrey** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

There has been no or lack of consultation to residents regarding this plan.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Flooding This site holds surface water that helps prevent too much build up on sites further down the valley which are flood plains, more water would flow from the site and potentially impact homes and businesses. Air Pollution The amount of cars added to the area would increase substantially, this would cause more air pollution for Key stage 1 schools on Saddleworth Road, and West Vale primary school, where the playground already sits beside a busy road. Traffic There seems to be no planning for the additional traffic, there are not many routes in and out of Greetland and they are already very busy at key

times. There is very limited public transport in the area. Doctors Surgery There is no plan to build a new doctors surgery, with so many houses the service will be very stretched. School Greetland Academy is already oversubscribed, class sizes are already at 60 children per year, if this is pushed up it would impact the education given. No plan for a new school has been issued to deal with the additional number of children to move into the area. Additional Commentary The plan has been split into several different sites, because of this the amount of new houses does not look as large, until all the areas are taken into account. This should be made clearer. It also makes objecting a lot harder for members of the public which should be an easy to follow process.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1583** Site ref (if applicable): **LP0026**

Person ID: **1244129** Name: **Mrs Kyrie Travis** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

The Local Plan does take into account paragraph 177 of the NPPF and the associated PPG in the Sustainability of Greenbelt Sites. According to NPPF Paragraph 143 it states 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' And I do not feel that there are any very special circumstances for this site.

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREEN BELT The site satisfies multiple criteria for Green Belt. It is a known wildlife corridor, offering a home to countless animals and birds that would all be displaced. Residents in the area have noted sightings of bats, badgers, foxes and other animals, as well as lots of birds and surely, we should be working to protect these areas and the animals that live in them. Calderdale Council stated that Local Plan will only use 2% of the Green Belt but the proposed development in our area of Greetland is 38% of our Green Belt which is outrageously disproportionate. Especially when there are so many brownfield sites which could be used instead. NATURAL FLOOD DEFENCE I feel that one of the fundamental points to raise is the fact that the fields, which make up the greenbelt, act as natural drainage areas. The rain we experienced in Halifax, and the subsequent flooding, both in 2015 and more recently on Saturday 8 th and Sunday 9 th February 2020 is an example of how important pieces of land like this are to act as natural flood defences. If this land was built on where would all the excess water go? Probably to already built up areas, causing unknown levels of damage and chaos to existing residents. We only need to look on our doorstep, at areas like Sowerby Bridge, Mytholmroyd and Hebden Bridge, and how devastating the flooding has been to see

the potential impact this could have in our own community. A video posted on social media on 30 th January 2020 highlighted Calderdale Councils bid to combat a Climate Emergency, which seems highly contradictory. A spokesperson on the video even mentions that in Calderdale we are -“vulnerable to extreme weather events"¦including flooding"So the Council are clearly aware of the problems in the local area and developing natural flood defences is certain to make this even worse. Surely if the local Council have recognised that there is a problem in the borough then plans to develop green belts sites shouldn't even be considered! TRAFFIC CONGESTION As a former resident of Rochdale Road in Greetland and a current resident of Saddleworth Road, I know all too well that traffic congestion in the area is a real problem. The area cannot cope with the current volume of traffic which travels through the area, particularly in West Vale and smaller country lanes such as Scar Bottom, on a daily basis so it is difficult to image what the area would be like with so many more vehicles. LOCAL INFRASTRCUTURE Another major concern is the local services which support the area, such as the doctor's surgeries and Greetland Primary School. Only recently I visited my midwife and was asked to book a blood test at the surgery within 2 weeks of the appointment, but the surgery didn't have an appointment for 5 weeks! Resulting in a trip to the local hospital so this could be done within the required timescales. It's difficult to envisage how the area could cope with so many more residents, all requiring access at some point to these services in the local area. It's clear to see just how important the greenbelt is to the local community. So many people are passionate about saving this and it seems ridiculous to even be considering greenbelt sites when there are so many brownfield sites which could and should be considered first. Once our greenbelt is developed and built on it is gone forever and we need to protect areas like this, which offers habitats to wildlife and help to avoid potentially devastating flooding.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

The council have made no effort to advise us of the proposed development of this site, we have received nothing through the post, via email or seen anything in the local area.

Suggested Modifications:

I would advise removing this site from the Local plan.

Comments:

Additional Evidence Link:

Comment ID **HRU1596** Site ref (if applicable): **LP0026**

Person ID: **1244137** Name: **Mr James Gilligan** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

The LP disregards NPPF Section,13 Protecting Green Belt Land as referred to in Paragraph 80. Calderdale Council have not been forthcoming in submitting plans to the inspector and allowing for detailled consultation.

Do you consider the plan to be Sound?: **No**

Sound Reason:

the plan in itself does not take in to account what impact it has on the close community. The following points I feel have been conveniently glossed over:- Local economy, Flooding, Highways, Employment, Accessibility, Greenbelt. The list is not exhaustive as these are some of the key points that seem to be blatantly overlooked. Local Economy The site would not benefit local companies as, the supply chain for house builders are already secured, construction would therefore come in from out of town which would also hinder the highways, pose a significant risk to local road users, schools and residents due to the unfamiliarity of the area. Flooding As just recently seen, the risk of flooding in and around Saddleworth Road constanlty poses a risk with breaches to to the fields and by vastly increasing the residential influx, causes significant increase to the water table pushing the flooding issues even further down into the village whilst also creating contamination from overload into the sewers. Highways The road infrastructure cannot not sustain the increased potential traffic as, by travelling down Saddleworth Rd on any given morning there is stationary traffic. By introducing on this site alone potentially in excess of 600 vehicles would put the village at breaking point. By pointing out mitigating circumstances of junction 24 would need to be look at shows the lack of understanding how it will impact the immediate community. Employment The site would not provide significant and permanent employment opportunities for the immediate areas as house builders already have a procurement supply chain in place. Accessibility The routes in and around Greetland are already congested and the introduction of the number of plots suggested would create such an impact. It only takes and accident on the M62 to re-divert traffic through Ripponden and down Saddleworth Rd and there is hours of traffic to contend with. This is not a off occurance as this happens time and time again. Greenbelt The greenbelt should stay as it is, open spaces are a key part of the landscape, not just for the aesthetic point of view but as a sustainable place of living for flora and fauna. there are herons, Kingfishers, Woodpeckers, bats that all make this their habitat, by destroying this area you remove a key part of there ecosystem.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

The greenbelt should stay as it is, greenbelt for us, wildlife and future generations to enjoy.

Comments:

Additional Evidence Link:

Comment ID **HRU1600** Site ref (if applicable): **LP0026**

Person ID: **1243952** Name: **mrs angela jackson** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Nil public consultation in nearly 4 years. The first that most of Greetland residents heard of the LP was through a recently form facebook group. The LP completely disregards NPPF Section 13 Protecting Green Belt Land Paragraph 80.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Please see attached file

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

No co-operation has been considered. Just look at the current problems with infrastructure and their lack of plans for easing those.

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610161 ; http://calderdale-consult.objective.co.uk/file/5610158

Comment ID **HRU1611** Site ref (if applicable): **LP0026**

Person ID: **1244140** Name: **Mr Simon Walsh** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

1) The Calderdale Statement of Community Involvement 2015 states: -“We need to be very clear about what we are asking people and we must be sure that people understand what will happen as a result of this engagement. This includes being clear about what decisions have been made, what have not, and who will make the final decision."The proposed site is directly opposite my front door and a development on this site would have a huge impact for my family and our family life, yet to this day, I have never received a single piece of correspondence regarding this proposal, therefore lacking the clarity and involvement which the SCI calls for. With regards to the online portal, LP0026 is listed as part of Elland, which it clearly isn't. This is misleading and means it is easy for the site to be overlooked by residents who otherwise would want to state their objection. The process is far from ' simple' and is certainly not making it 'easy to get involved.' (SCI 1.3) 2) Esther McVey, Housing Minister's written policy onGreenBelt land states: -“Of course one of the most important environmental safeguards we have is the Green Belt. And I want to be clear that our commitment to this is as strong as ever, with any changes only happening in exceptional circumstances ; protecting the Green Belt goes beyond protection against development" In these circumstances, our Green Belt is not being protected. In the local plan, this site is being referred to as 'green field' when it is legally classed as 'green belt' and therefore should only be built on under exceptional circumstances and ' when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including :- making effective use of suitable brownfield sites.' (The Government White Paper -“Fixing our Broken Housing Market"Parag 1.39) There are other suitable brownfield sites in the local area which could be used and therefore would mean the 'right houses were being built in the right places.'

Do you consider the plan to be Sound?: **No**

Sound Reason:

Disproportionate amount of building in the Greetland area. As sites LP0026, LP177, LP0952 and LP1625 are so close in proximity they cannot be viewed individually as the overall impact of the local plan would be catastrophic to Greetland as a whole and the surrounding areas. Under the Calderdale Review of Polling Districts 2019, the number of properties per polling district is as follows: Greetland 1221, Sunnybank 505, West Vale 1119. This totals 2,845 properties. As LP0026, LP0177, LP0952 and LP1625 are all in immediate vicinity of Greetland and Sunnybank wards, combined this would see 543 additional new houses built in this distinct community on top of capacity allocated in the 2018 plan. As a percentage of the 3 wards this would see a disproportionate growth of 19% or 22.4% when adding in the 2018 site allocations. It could also be argued that the West Vale Ward is a community in itself (having its own primary school) which would take growth of Greetland and Sunnybank to 31.4% or 33.8% when including 2018 allocations. Greetland also does not have the infrastructure to cope with an additional 600 houses in terms of schools places, doctors and traffic issues. Flood areas The NPPF states that planning policies and decisions should promote public safety and take into account wider security and defence requirements by: ' a) anticipating and addressing possible malicious threats and natural hazards... This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area .' This is a high risk flood areaand this site in particular soaks up a huge amount of surface water ensuring properties which lay below it don't flood.If this site was covered in concrete, the water would gush further down the road and cause huge problems for house owners. Air pollution 'There are legal requirements and aspirational targets for levels of different air pollutants. The government recognises that protective health - and tackling air pollution - requires action, and is committed to improving the UK's air quality and reducing harmful emissions. The draft Clean Air Strategy, published in May 2018, sets out the case for action and demonstrates the government's determination to improve our air quality.' Building 600 houses on one raod clearly won't improve air quality.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

As mentioned previously, Calderdale Council have done nothing to inform residents of the local plan. It could also be argued that listing all four local sites under 'Elland' and the complex method of objection were all strategies to stop residents having their say rather than co-operating with residents.

Suggested Modifications:

Removal of all Green Belt sites (LP0026, LP0177, LP0952 and LP1625) and a revision of brownfield sites for any new and existing opportunities both in our authority and within neighbouring authorities.

Comments:

Additional Evidence Link:

Comment ID **HRU1619** Site ref (if applicable):

Person ID: **931414** Name: **Mr Edward Greenwood** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

I submit that the Local Plan is not legally compliant in the following circumstances: That reference to the Town and Country Planning (Local Planning)(England) Regulations 2012 Part 6 Sec18 (1) and (2) in that the Authority have not shown evidence that they have complied with the requirement to inform in the preparation of the plan

Do you consider the plan to be Sound?: **No**

Sound Reason:

In the matter of soundness of the Local Plan, I submit that the Authority has significantly understated its density allocations and that the Corporate Lead has not addressed this issue as promised at the termination of the Stage 1 hearing. It is stated that the density shall be a minimum 30 per hectare yet there is instances where this is less. Also the Local Authority's Director of Regeneration stated in his report that the update cannot change except for 'typographical errors and presentation in order to give clarity' yet on the 20/1/2020 a substantial change in developable area and residential capacity was made. The Corporate Lead also stated at the termination of the Stage 1 hearing that the subject of the Aspirational Economic Growth would be addressed. There is no evidence that this has taken place in this update despite evidence that the relationship between Economic growth and Housing is tenuous and that the Growth rate is not supported by national available datasets. The following are informational and substantive notes on the Soundness of the Updated additions to the plan Your attention is drawn to the following. Para 133 of the NPPF (2019) where the essence of the Green Belt is described. The two essences are given as permanence and openness. Hence any piece of land designated Green Belt, however large or small, cannot be taken out of Green Belt status or it will have lost its permanence. Similarly it cannot be built upon or it would lose its openness. Para 136 states that, in constructing Local Plans, local authorities can alter Green Belt boundaries only in exceptional circumstances. Thus, should an exceptional circumstance be proven then the Local Authority may alter the boundaries of a Green Belt area. It should be noted that the operative word here is ' alter '. Now in which way can a Green Belt boundary be altered? To answer that questionwe must refer back to para 133. If the boundary were altered in such a way that it removed land from the Green Belt that would then contravene para 133 which determines the permanence of Green Belt. Thus the only boundary altering that may be done is the extension of an area of Green Belt by moving its boundary outward. ********** Mr Justice Jay in the Calverton Parish Council v Greater Nottingham Councils [2015] EWHC 1078 stated that :- - “it would be illogical, and circular, to conclude that the existence of an objectively assessed [housing] need could, without more , be sufficient to amount to -“exceptional circumstances"within the meaning of paragraph 83 of the NPPF (2012)"This judgement also applies in context of paragraph 136 NPPF (2019). R (LeeValleyRegionalPark Authority) v Epping ForestDC [2016] EWCA Civ 404, Treacy, Underhill, Lindblom LJJ -“The concept of -“openness"here means the state of being free from built development, the absence of buildings ; as distinct from the absence of visual impact"[7] Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council [2015] EWHC 1078 (Admin), Jay J Richard Turney appeared for the Claimant -“Mr Turney "¦ submitted that the fact that a particular site happens to be suitable for housing development cannot, without more , constitute an exceptional circumstance justifying an alteration of the Green Belt. I Mr Turney insofar as this goes"¦ Suitability simpliciter cannot logically be envisaged as an exceptional circumstance. Thus the Local Plan contravenes the NPPF wherever it attempts to take land out of Green Belt status for the purposes of housing need ********** WSP Parsons Brinkerhoff Report to Calderdale M.B.C. CALDERDALE LOCAL PLAN TRANSPORT EVIDENCE BASE 2017 However there are several problems with this. First notice that the housing projection for Node 3247, New Gate Farm (276). This gives a traffic flow increase to 115%. Secondly, Note that there is no assessment of projected land

from LP1407, LP0026, LP1625, LP1283, LP0037, LP0065, LP0982, LP0146, LP0951, LP0041 and LP1470. This totals a possible extra traffic flow at Exley Lane as 1929 by virtue of houses (1057), a further increase of 19%. This also does not take into account the consequential traffic flow through Stainland Road/Saddleworth Road Junction in West Vale which will have to take this traffic as well. Also there is no assessment of the input to Rochdale Road/Stainland Road junction by virtue of the output of Stainland Road/Saddleworth Road junction. Again no assessment has been made due to other sites in Greetland and Stainland Ward. Also West View has been assessed as being 87 houses where the Local Plan now shows 127 houses. Therefore I conclude that the WSP Parsons Brinckerhoff report is flawed and that CMBC cannot consult the public on incomplete and/or incorrect data. Node 3948 LP1223 Lowfields, Lacy Way, Elland due to Saddleworth Road Current Traffic 458; Expected Traffic 624; 36%increase Node 3247 Effect on Exley Lane New Gate Farm, Saddleworth Road Houses 276; Current Traffic Flow 401; Expected Traffic Flow 715; Increase 73% Ellistones Place Saddleworth Road. Houses 279; Current Traffic 783; Expected Traffic 938; Increase 20% Not included in Node 3247 assessment LP1407 26 Scar Top LP0026 67 The Gate Farm LP1625 36 Silverdale LP1283 19 Glenholme LP0037 30 Long Heys Farm LP0065 36 Nab End LP0146 31 Church Lane P0041 15 Stainland Road Included in Node 3247 assessment LP0177 279 Ellistones Place LP0952 319 Land at New Gate Further Notes WSP Parsons Brinckerhoff Technical Note 1 Sections 5.6.4 In Greetland, the area south of the Saddleworth Road is not currently served by high frequency bus corridors. It might be possible to increase service levels on existing routes. However, given the distance from existing high frequency corridors and the level of congestion at West Vale, this might be perceived as not commercially viable by operators. In addition, congestion at West Vale makes bus journeys from Greetland to Elland and Halifax less reliable Your attention is also drawn to the effect of the Calderdale CIL Charging Schedule Section 3.7 shows this site LP0026 to be in Zone 5 thereby attracting a residential charge of Â£5 per sqm. Given that the average new build is about 67 sqm. That this site has been assessed as 67 dwellings gives a CIL contribution charge of Â£22,445. Given that the CIL legislation requires 15% to be allocated to the community for its agreed benefit then the amount realised (Â£19,078) does not appear to be sufficient to fund the mandatory infrastructure, Flood mitigation, Primary and Secondary Education, Green Infrastructure , Improvement, Highway Schemes, Public Transport Schemes, Pedestrian and Cycle Networks, Sports Leisure and Recreational Facilities and Public realm Improvements, The overall educational requirement of the sites on Saddleworth Road are approximately 600 dwellingsand using Calderdale M.B.C. education ratio of .35 per dwelling suggests school place requirement of 210 school places (This site 23 places). This is untenable as only approximately 2 places are available at Greetland academy (Business Manager, Greetland Academy) in any one year usually due to families leaving the area. Notes: Former Car Lots on Queens Road, Pellon. This has sat derelict for years and is surely prime for re-development. Old Lane (Off Keighley Road) a Former Mill Building and land in excess of 8 acres which is prime for re development

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Whilst not a mandatory requirement, the submission of the original Local Plan as submitted to the Inspector involved a cooperative element extended to full Council of all Councillors. This update has not and could therefore be at odds to the Duty to Cooperate. Also there is legislation that preparation of the plan shall involve businesses of the area. This also has not taken place.

Suggested Modifications:

That the update be rescinded and merged with the original Local Plan and the assessments be made publicly available for comment.

Comments:

Additional Evidence Link:

Comment ID **HRU1623** Site ref (if applicable): **LP0026**

Person ID: **1243369** Name: **Mr Geoffrey Eagle** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

The site is 'greenfield' and non-Green Belt alternatives are available nearby that do not appear to have been considered. For example, there is a 6.53-acre site for sale by JLL off Ellistones Lane Greetland that could be used for housing.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Traffic on Saddleworth Road and at the West Vale traffic lights junction will increase and this is a problem. Traffic near the school is already a problem at certain times of the day and additional traffic will make this worse. Surface water flooding is a problem in this area and as the area is a high flood risk this needs to be considered.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1648** Site ref (if applicable): **LP0026**

Person ID: **1244169** Name: **mr Giles Walker** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Please see attached objection document

Do you consider the plan to be Sound?: **No**

Sound Reason:

Please see attached objection document

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Please see attached objection document

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610201

Comment ID **HRU1663** Site ref (if applicable): **LP0026**

Person ID: **1244084** Name: **Mr Daniel Black** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

The proposeddevelopmentis contrary to government policy. It does not comply with NPPF guidelines, government guidelines on the use of green field sites or government guidance on building on flood zones.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Flood Risk ; Flooding is a huge issue around Calderdale. We have seen the disruption, chaos and pure misery this causes local people as recent as 9 th February 2020 (see attached images of Blackbrook). To suggest building such a huge development above and in a flood plain, just seems completely illogical. The negative impact that will be felt on properties that are already at risk and ones that will be at risk from an increase in water runoff is beyond comprehension. For this reason alone, the development should be rejected. To even suggest increasing the risk of flooding to local residents is mind boggling. Highway / Local Infrastructure : The development will have a hugely negative effect on the already extremely busy Saddleworth road / Stainland Road and Rochdale Road / Stainland road junctions. The roads already struggle to cope with the amount of traffic from commuting, so it seems implausible to increase the traffic by a potential 1000+ additional vehicles using this route. The junctions at the Co-op on Saddleworth road and Tesco on Stainland road are already extremely dangerous for pedestrians, this danger would amplify significantly due to the increased usage from the residents of the proposed development. Parking is also a huge problem in West Vale, to increase the local population by such a large number would put the already lacking parking to bursting point and would increase risk to drivers and pedestrians safety massively. The local school has no capacity to extend, and has expressed several times that it is not willing to extend. The doctor's surgery is already packed and it can take several weeks to get an appointment. Local dentists are not accepting any NHS patients. There is also a huge shortage of police numbers for an area recently targeted by gangs of car thieves, to increase the number of potential victims of crime, would put a huge strain on an already stretched Police service. POLLUTION / AIR QUALITY ; The pollution caused from the increased number of cars on the roads is unimaginable and the health of the Junior School children would be at a high risk as would the whole community. It is a fact that increased pollution would seriously affect the health of our children both now and in future generations. Noise pollution ; The proposed development will directly, negatively affect the quality of life of local people through noise pollution for

many years, due to building work and industrial machinery. This will also have an adverse effect on the wildlife that will be disrupted, particularly during mating season. Greenbelt & Wildlife - Theproposalis also an inappropriatedevelopmentwithin greenbelt land. Consideration to build such a large number of dwellings on Green Belt land is totally against all current guidelines and recommendations. Earlier surveys stated the area to be "highly sensitive" The area is a haven for Deer, foxes, Herons, bats and more recently the owls have returned. Not to mention the joy it brings to walkers. Size and density of proposed development - Thelayoutand density of the proposeddevelopmentis inappropriate to the local area, as forementioned, the infrastructure simply could not handle such an increase in residents or traffic. This development has already been rejected previously, so to regurgitate the same plans without any solutions to flooding, noise, pollution or risk to life concerns is to say the least, bizaar! To approve such a development, would set a dangerous precedent for future proposals on such fragile and important greenbelt land. With the threat of a global climate emergency, it is baffling to suggest that any development would be built on such precious land.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

I feel there has been a very limited co-operation from the council.

Suggested Modifications:

Move the proposed house building to brown field sites. Re-look at the flooding issues

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610219

Comment ID **HRU1664** Site ref (if applicable):

Person ID: **1243982** Name: **Mrs Linda Ashton** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Allocation Numbers LP0177, LP0952, LP1625 and LP0026 Flooding ; The way land has been allocated for the Local Plan, if it is allowed to be developed, the area will become a 'perfect storm' for flooding disasters. Part of the land in plot LP0177 is allocated as Flood Zone 3a, however, this does not actually provide a fully realistic picture of how this land frequently and routinely floods. The way in which this land floods poses a risk to life, never mind a risk to property and infrastructure, which it absolutely does. The area most severely impacted by flooding is at the bottom of the chain of land for development, so development further upstream from this land, and this land itself, would increase risk to life and risk to existing property and infrastructure. To say that the effects of flooding can be safely and effectively mitigated against is totally unsupported due to the lack of testing. There is no record of sequential or exceptional testing. Please see the attached evidence as proof of how badly this area is hit by flooding. The land in the Local

Plan, in Greetland was even flooded during the consultation period for the Local Plan. What are the chances? Well, relatively high actually when you take into account how often we experience flooding, and given the time of year. A major bridge in Elland was destroyed after the last episode of extreme flooding, Boxing Day 2015. This bridge was operational again less than 3 years before a shipping container crashed into it in February 2020, again due to flooding. The Flood water carried the shipping container downstream, from where it once stood on dry land. The council had to inspect the bridge for structural damage. The council does not have the funds to keep repairing infrastructure and improving flood defences. Over thirty million pounds, and I use that figure so as to be cautious ; it may now have increased considerably ; has been spent on Flood defences in Calderdale. Please see attached evidence of flooding. Calderdale Council is requesting both special classification and extra funding from the government due to the routine problems we face in Calderdale regarding Flooding. The only 'special circumstances' are the flooding circumstances. It is in no way sustainable to build on land that has such a close relationship to flooding. Flooding in the immediate area has already cost the council millions of pounds, like the rebuild costs of Elland bridge. The way the land in this site of the Local Plan acts so as to retain and reduce the flow of flood water is actually economically valuable to the council and the community. We can't afford to keep repairing infrastructure damaged due to flooding. To release this land for development would have detrimental economic implications; it is not economically viable. The NPPF clearly states that development should not put existing property at risk; building on this land puts Woodfield Drive at a directly increased risk of flooding. Development of this land also puts areas further downstream at an increased risk of flooding. The water from Black Brook contributed to the destruction of major infrastructure in 2015. With Climate changed, the situation with flooding in this area should not be actively made worse in addition to the increased threat posed by natural forces; this is also something supported by the NPPF. On the grounds of flooding alone, this site should be removed. There is no mitigation that could equate to the way in which the land currently processes flood water. Is this why details of mitigation have been left out of the plan? Green Belt ; The development proposed for this plot of land completely ignores the adverse effects of building on Most Sensitive Green Belt. The council has stated in the evidence it has provided that this site performs strongly against the 5 purposes of Green Belt land. To release Green Belt land for development, when the housing requirement cannot be sufficiently justified would cause significant and unnecessary damage to the community and the environment. This land should not be wasted in this way. There is no justification for the release of this Green Belt land under 'special circumstances,' as the alleged housing requirement is unjustifiable, due to the out-of-date information it is based on. The Local Plan in Calderdale is based of pre-Brexit figures. The council is also suggesting that we will experience growth that totally contradicts national trends, despite the fact that Calderdale is recorded as being a poorly performing council. The housing requirement is totally unjustifiable on paper. In reading the inspector's letter, we believe that the inspector has already realised this for herself. To release Most Sensitive Green Belt that also is extremely sensitive due to its relationship with flooding, based on and unjustified housing requirement is not a sustainable or prudent planning strategy. Sustainability and Infrastructure ; The scale of development is beyond the infrastructure capabilities of the village. The site is not sufficiently sustainably located to accommodate the scale of development proposed. The local school is an academy, and therefore not obliged to expand. Traffic Impact ; There would be a significantly adverse impact on the Strategic Road Network. In the Council's individual assessments of the sites, which resulted in them all being filtered and not taken forward for housing, the consultation from Highways England advised that the development of the scale envisaged would have a significant adverse traffic impact on the Strategic Road Network. Given this how can the sites now be put forward for allocation for housing when nothing has been done to either challenge those comments or address them? Similar issues have been highlighted in Hipperholme, and subsequently sites were removed. The level of air pollution around West Vale traffic lights, and Saddleworth Road where the traffic is known to tail back as far as the school has not been monitored, to public knowledge. There is no evidence of sufficient monitoring in any of the paperwork connected to the Local Plan. We did see official looking individuals appearing to carry out some form of traffic monitoring, during the consultation period, but this was for a brief period of time, in the middle of

the afternoon. If this is the monitoring the council or the developers suggest that the inspector should make a decision based on, then it is woefully insufficient, and does not in any way represent the reality of the traffic situation on Saddleworth Road. The residents are not dreaming up the issues we face in this area due to West Vale traffic lights. Why are the issues and Hipperholme recognised, but the issues at West Vale masked over? The surrounding areas have to travel through Greetland and thus West Vale traffic lights in order to reach towns and the motorway. The traffic created by commuters poses a serious constraint to this development, one which has not sufficiently been addressed. This development has been allocated without operational assessment of the local road network. To say in the site report that the cumulative traffic impact is being assessed is not sufficient. To what degree is the cumulative traffic impact being assessed? Due to the traffic constraints of Saddleworth Road and the surrounding area, this development is not sustainable. Air Quality ; The scale of development proposed would have an unacceptable impact on air quality. The level of air pollution around West Vale traffic lights, and Saddleworth Road where the traffic is known to tail back as far as the school has not been monitored, to public knowledge. There is no evidence in any of the paperwork connected to the Local Plan. Saddleworth Road is a highly sensitive road in terms of air pollution die to the high numbers of children present of this road, as the local primary school and preschool are both situated on Saddleworth Road, in immediate proximity to the congestion areas. Children are at an increased risk of air pollution ; this is a scientifically recognised fact. Loss of Open Space and Public Amenity ; The development would result in the complete loss of natural and semi-natural open space. The landscape would be irreversibly changed to such a degree that it would no longer attract residents to use the public right of way. The proposed development would make the public right of way unfit for purpose and unsafe for use. The risk of crime and the fear of crime would be greatly increased by the alteration to the public right of way brought forth by this development. Ecology ; There would be an unacceptable impact on wildlife habitat arising from the scale of development proposed, which is totally unnecessary given that the housing requirement is much too inflated in reality. Heritage ; No assessment has been made of heritage impact. Why has an assessment not even been carried out? Again, this points to the fact that land was entered into the plan in a rushed manner without due care and diligence.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Remove this land from the plan. Increase density in Brighouse.

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610220

Comment ID **HRU1673** Site ref (if applicable): **LP0026**

Person ID: **1239517** Name: **Mrs Nada Duckworth** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

I accuse Calderdale Council of misrepresenting this area, incorporated Greetland with Elland. Greetland is a

Village and Elland is a Town, different populations and different post codes. By doing this it is misrepresenting the volume of build allocated to this area, this can not be lawful under misrepresentation and even in the Local Plan you have put us down as Elland. All the other areas have been correctly labelled. I accuse Calderdale Council of misrepresenting this area, incorporated Greetland with Elland. Greetland is a Village and Elland is a Town, different populations and different post codes. By doing this it is misrepresenting the volume of build allocated to this area, this can not be lawful under misrepresentation and even in the Local Plan you have put us down as Elland. All the other areas have been correctly labelled. 1) The current policy and legislation on flooding states -“due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in high flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere"- In the Calderdale Boxing Day Floods 2015 the field LP0177 Ellistones Place Saddleworth Road, Greetland suffered severe flooding. Any building on this land would cause flooding and therefore does not comply with current flooding policy and legislation as outlined above. Calderdale Council Planning Department has a legal responsibility to comply with current policy and legislation on flooding. These fields are a natural and essential soak off and any building on this land would further increase the flooding in this high risk flood area. 2) I draw your attention to Esther McVey, Housing Minister's written policy on Green Belt land.; -“Of course one of the most important environmental safeguards we have is the Green Belt. And I want to be clear that our commitment to this is as strong as ever, with any changes only happening in exceptional circumstances ; protecting the Green Belt goes beyond protection against development"- Esther McVey has provided Â£2 million pounds for Councils to employ Enforcement Officers to prevent Green Belt land being built illegally and Calderdale Council is listed as one of the Councils who is a recipient. The Enforcement Officer's role is to ensure "unscrupulous developers" do not apply pressure on Councils to build on the Green Belt and not the available brown field sites because "developers don't want to build on brown fields sites". - Horsfall Mill is an ideal brown field site and meets the demographics of the area perfectly and complies with the NPPF government policy of -“building the right houses in the right places" Exceptional circumstances in The Government White Paper -“Fixing our Broken Housing Market"Parag 1.39 states that: The Government wants to retain the high bar to ensure the Green Belt remains protected, but we also wish to be transparent about what this means in practice so that local communities can hold their councils to account therefore we propose to amend and add to the National Policy to make it clear that: authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including :- making effective use of suitable brownfield sites (Calderdale Council has not adhered to this with regard to Horsfall Mill, West Vale) and the opportunities offered by state regeneration:- I refer to the Judicial Review - Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Councill (2015) EWHC 1078 (Admin), Jay J - where Richard Turney appeared for the claimant "Mr Turney ... submitted that the fact that a particular site happens to be suitable for housing development cannot, without more, constitute an exceptional circumstance justifying an alteration of the Green Belt. I agree with Mr Turney insofar as this goes .. Suitability simpliciter cannot logically be envisaged as an exceptional circumstances". -This land is classified as "highly sensitive green belt" on the Local Plan and there is no legal justification for building on this land. It is not legal to classify Green Belt as green field on the Local Plan ; they are totally different and your own tests states all the Green Belt land identified on Saddleworth Road in the Local Plan for building meets the five test and therefore you have no legal right to change this classification. I question the legality of Greetland being placed in with Elland on the Local Plan; Greetland is a small village in the Greetland/Stainland Ward HX4 whereas Elland is a town HX5 ward. This is false representation and when you look at the building volume within this area of approximately Â½ a mile in this small village taking out the whole of the Green Belt land on the south side of Saddleworth Road this will totally change the nature / look and the openness of the village and is a prime case of urban sprawl. Mr Justice Jay in the Calverton Parish Council v Greater Nottingham Councils [2015] EWHC 1078 stated that:- -“it would be illogical, and circular, to conclude that the existence of an objectively assessed [housing] need could, without more, be

sufficient to amount to -“exceptional circumstances"within the meaning of paragraph 83 of the NPPF" R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404, Treacy, Underhill, Lindblom LJJ -“The concept of -“openness"here means the state of being free from built development, the absence of buildings ; as distinct from the absence of visual impact"[7] Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council [2015] EWHC 1078 (Admin), Jay J Get

Do you consider the plan to be Sound?: **No**

Sound Reason:

Horsfall Mill, West Vale is ideally located for affordable, good quality housing; it would not change the nature or look of the village and is perfectly located for young first time buyers to access the many amenities / leisure facilities without the need for a car. The Calderdale Plan targets for housing as we have now come out of the European Union the housing volume should be less resulting in a much lower housing target and reduce the need to release the Green Belt sites in Greetland. The NPPF sets out the aim of Green Belt policy which is -“to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."(NPPF Â¶79). Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: (i) to check the unrestricted sprawl of large built-up areas (ii) to prevent neighbouring towns merging into one another (iii) to assist in safeguarding the countryside from encroachment (iv) to preserve the setting and special character of historic towns (v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The Council, in its own evidence, concludes that the overall parcel within which the site is located performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt but, most decisively, would see the coalescence of Greetland and West Vale and the deterioration of the identity of both places undermining the Council's Settlement Hierarchy. Notwithstanding this, the quantum of housing proposed in and around the site is undeliverable during a single plan period in plan-making terms and unsustainable in infrastructure terms in relation to the capacity of existing highways, schools and local services. Accordingly, these sites on Saddleworth Road in the existing Green Belt should be removed from the Plan as the exceptional circumstances for their release does not exist. Furthermore the proposed sites do not meet national policy with regards to flooding. Clean Air Policy ; even higher numbers of traffic would cause further pollution in what is already a bottleneck area of high congestion. And be detrimental to the health of the toddlers / young children at Sunny Bank Nursery / Pre-School whose playground is situation approximately 3 feet from this very busy main road (picture attached of congestion down this road). Saddleworth Road services many areas i.e. Barkisland, Ripponden, Norland and other outline districts and heavy goods vehicles regularly use this road e.g. Sonoco; these are high pollutant diesel vehicles and evidence shows particles of pollution fall lower to the ground making small children more vulnerable.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

To build on the Green Belt sites proposed in the Local Plan would totally change the nature / look and openness of the village in a very detrimental way to both residents and wildlife in this wildlife corridor whilst also being illegal due to the flooding and protected Green Belt policy in the NPPF.

Suggested Modifications:

N/A

Comments:

Additional Evidence Link:

Comment ID **HRU1682** Site ref (if applicable): **LP0026**

Person ID: **1243249** Name: **Miss Helen Edwards** 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:

The plan is not sound for a number of reasons: The proposed developments in the local plan are disproportionate to the existing village of Greetland. The overall local plan for 600 properties equates to around 30% of the current properties. All of the plans for the Saddleworth road area have the same impact on local infrastructure. Flooding: The proposed developments at The Gate farm are on the hill side which is currently grassland and so aids the adsorption of rainfall, slowing the run off to to the Black Brook and other streams in the area. Building on this land will lead to increased run off due to rooves and other hard impermeable surfaces. Even with the current grassland, at the beginning of February 2020 following Storm Ciara demonstrated the susceptibility of the local area to flooding. The Environment Secretary has stated that extreme rainfall events such as this will become more frequent as a consequence of climate change. Therefore flood plains and green spaces will become ever more important to -“slow the flow"and reduce the peak river levels further downstream. To build houses here is in appropriate both at a very local level and further afield. Infrastructure: The existing infrastructure is not adequate to support the development on this site or at others identified within the local plan. The road network is already operating at capacity and frequently backs up at Saddleworth Road and Stainland Road at peak times, additional traffic from the development will only exacerbate this problem further. The queuing traffic will lead to increased levels of pollution, which is of particular concern at the Greetland school site which is situated at a lower level than the road. There currently is no space at doctor and dental surgeries in the area. Similarly the additional housing proposed will be designed with families in mind, and there is insufficient capacity at local schools. There are extremely limited public transport services in the area. Greenbelt and wild life: The Greenbelt is protected land which is designed to prevent urban sprawl and towns merging into one entity. Greetland and Barkisland are villages if building on the Greenbelt takes place, then there will be no distinction between them. There is no valid reason to destroy this Greenbelt land when there are brownfield sites available in the area for development. There are many mature trees on the site that need to be protected, as well as the visual amenity, these trees reduce pollution, stabilise the land reducing erosion caused by surface water at times of heavy rain.

Comments:

Additional Evidence Link:

Comment ID **HRU1688** Site ref (if applicable): **LP0026**

Person ID: **959557** Name: **Mrs Nikki May** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

I strongly object because the local plan is in contravention of NPPF Section 13 Protecting Green Belt Land Paragraph 80. Once green belt land is gone, it is lost forever.

Do you consider the plan to be Sound?: **No**

Sound Reason:

I believe the plan is not sound in a number of areas Flood Risk Infrastructure Wildlife Loss of Public Space Airquality 1 Flood Risk With the increased regularity and severity of flooding in the Calder valley, the development of this land will be hugely impacted by flooding. The water run off into Black Brook already causes serious problems downstream- only a fortnight ago the floods of 9 th February saw Greetland Cricket Club, Heath Rugby Club and Clayhouse Park all under water ; so it is hard to understand howbuilding on this site, which is aflood plain, could possibly be a sound proposal. 2 Infrastucture The village road infrastructure is already choked up at rush hour, and the proposed number of houses will attract families and easily twice the number of cars to houses All local doctors surgeries are currentlyoversubscribed The local schools are oversubscribed so where would the children of the residents of the new development go to school? 3 Wildlife The local wildlife will behugely impactedby the proposed development particularly birds such as Herons & Kestrels. I am a regular walker in the area and am heartbroken that this beautiful ecosystem could be lost forever. 4 Loss of Public Space Theimportance of green space with fields and trees and nature cannot be underestimated. This land is part of a beautiful andtranquil space where people can get away from the stresses of life. It is also within walking distance of the local community and therefore people do not have to drive to enjoy the countryside. 5 Airquality The huge increase in the number of motorcars will have a negative effect on local air quality.600 houses equates to a potential for 1200 additional cars from the 4 proposed Greetland LP sites - which could equate to 2400 journeys each day. Currently both Saddleworth Road and Rochdale Road are already clogged each morning with stationery cars having their engines running and polluting our village.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

I urge you to remove this site from the local plan and instead to identify brownfield sites instead

Comments:

Additional Evidence Link:

Comment ID **HRU1717** Site ref (if applicable): **LP0026**

Person ID: **1244178** Name: **LYNDSEY ASHTON** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

I do not believe that the Local Planadheres to legislation set out in The Climate Change Act 2008 (2050 Target Amendment). I am not able to see any evidence of additional measures to respond to climate impacts of above-trend growth in employment and housing.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Flooding ; Part of the land allocated in the Local plan is allocated as Zone 3a, and it is at the bottom of the chain of development. Development is only acceptable if sequential and exceptions tests area passed. There have been no such tests carrier out. There is clear, extensive evidence that this site floods and on a much larger scale than is represented in the site report. Green Belt ; adverse impact arising from allocation on land identified as Most Sensitive Green Belt. Heritage ; no assessment has been made of heritage impact. Sustainability and Infrastructure ; the scale of development is beyond the infrastructure capabilities of the village. The site is not sufficiently sustainably located to accommodate the scale of development proposed. Traffic Impact ; there would be an adverse impact on the Strategic Road Network. Air Quality ; the scale of development proposed would have an unacceptable impact on air quality. Open Space ; there would be complete loss of natural and semi-natural open space. Ecology ; there would be an unacceptable impact on wildlife habitat arising from the scale of development proposed. Loss of Public Amenity, Habitats and Biodiversity: Paragraph 98 of the NPPF clearly states that Planning policies and decisions should protect and enhance public rights of way and access. The site report for LP0177 acknowledges the importance of the recreational value of the Black Brook area, and hence the public right of way that allows the community access to this area. However, the site report wrongly suggests that the development will increase recreation pressure on the Black Brook. This simply will not be the case, due to the extreme destruction of the landscape surrounding Black Brook. The visual amenity currently provided by the site would be wiped out by the proposed development, and by way of closing in the public right of way, the footpath would become unsafe for users, and hence unfit for purpose. I shall further expand upon these points below. The community gains access to this amenity, the public right of way, and hence Black Brook, via the entrance to the east of the junior school. If a housing estate lines, and therefore closes in and narrows the public right of way, the landscape will be significantly harmed to such a degree that the amenity will be rendered unfit for purpose. Further to this, altering the amenity of the public right of way in such a dramatic fashion will render the footpath, currently used daily and frequently, unsafe. This is because the development will result in the amenity losing its open quality. Very recently, a woman was brutally sexually assaulted in Elland, in an area that was not an open space with good visibility. This type of narrowed, long pathway attracts crime. To remove the openness and visibility of this well used public right of way will put those who use it at a considerably increased risk of crime. The NPPF states that the Local Plan should create safe accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion. The open space along this public right of way must be maintained in order to reduce the occurrence of crime, keeping this amenity a safe place for the community to continue to use. To close in the public right of way is in direct opposition with the National Planning Policy Framework. The NPPF sets out the need to protect existing open space, which this plan

does only in pseudo form; it does not protect the amenity or the community using it. The proposed development along this amenity is inappropriate. The NPPF sets out the requirement for support of local communities through local neighbourhood plans to identify for special protection green areas of particular importance to the community, by designating the land as Local Green Space The NPPF guards against the unnecessary loss of valued facilities and services, particularly when this has the effect of reducing the community's ability to meet its day to day needs. A huge number of individuals within our community use this public right of way to walk their dogs, take exercise, and unwind and destress in the form of walks in a tranquil setting, all of which they currently have access to for free, in a safe environment. Children take great joy in walking along this public right of way, and gain valuable access to the natural world in an ever-increasing age of digitalisation. Many scientific studies have been conducted on the value and importance of children spending time outside in the natural world, science has also established a connection between spending time outdoors and the increase of life expectancy. The importance of this public right of way is evidenced in the photographs of the community protest walk, which took place along the public right of way, on Sunday 16 th February. This walk was so popular that it featured in the local and reginal press, and was even featured in the local press prior to the walk, as it was such a huge issue within the community. All land in the proposed plan was walked along during the walk. The NPPF asserts the importance of protecting areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason. This applies to the public right of way down the side of the primary school, and along Black Brook. These policies must be effectively adhered to, or they become pointless in their existence. This land is classified as highly sensitive land on the Local Plan. Along Black Brook, we currently have a wildlife corridor, which is further testament to the beauty and tranquillity of the area which the proposed development would unavoidably decimate. The introduction of non-physical disturbances to the wildlife and protected species in our area, such as noise, vibration, visual presence, human presence and light pollution, in combination with increased air pollution, given that the proposed development is in a disproportionately highly concentrated area along a condensed stretch of one road, would have disastrous effects on the wildlife corridor. In effect, we would lose much of the life we currently see along this vital public amenity. The NPPF states, under the section addressing Habitats and Biodiversity, paragraph 174, that the Local Plan must, 'protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity"¦ wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation.' The way in which this plan proposes to impose such a largescale development along the stretch wildlife corridor, when less sensitive land was removed from the updated plan, is in direct opposition with the NPPF. Developing the land on this site would take the form of a negative response to the local context of this amenity. This proposal, by way of its drastic removal of open space ; directly related to this public amenity, unreasonably compromises the way in which the community routinely takes part, on a daily basis, in legitimate recreational activities along the public right of way. Activities and community groups like 'Little Wanders,' currently use the public right of way amenity, that stretches the length of the proposed development, which is not an unreasonable expanse of land to protect. These community walks, geared at allowing young children and their families access to free exercise and social interaction, are incredibly important to the health and wellbeing of our community. The children who participate are allowed to become more in touch with their environment than they routinely are in our ever-increasing digital world. As a result, the children become better integrated into society and are more committed to protecting the environment. It is important that the next generation is educated about their environment, within their environment. In this way, the Green Belt serves as a place of education and a means of bolstering the community. Calderdale has been identified as a deprived council. The latest government figures show that Calderdale is in the top quarter of most deprived authorities in the country. There will be serious detrimental impact on the wellbeing of the residents in this one, small area of what has been classed as a deprived council. This type of facility serves to protect and bolster mental health within the community. As stated on the Gov.UK

website, 'A new study has been published by Natural England which reviews the benefits and outcomes of approaches to green care for mental ill-health"¦ A report published February 9 2016 shows that taking part in nature-based activities helps people who are suffering from mental ill-health and can contribute to a reduction in levels of anxiety, stress, and depression.' At a time when mental health is arguably at crisis point, designated areas where individuals and community groups know they can visit are invaluable. Designated spaces like the popular amenity public right of way in Greetland, which runs alongside our precious wildlife corridor and Black Brook, can afford communities free and easily accessible facilities, facilities which the council can cheaply and effectively work into mental health schemes. The importance of this site is due to the amount of biodiversity of wildlife concentrated in this area. The NPPF states that the Local Plan should take account of climate change over a long period of time, including factors such as flood risks, changes to biodiversity and landscape. The NPPF also states that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. To put the wildlife corridor at an increased risk of survival, and potentially decrease biodiversity in the area, at a time when climate change already poses a risk to it, especially given that the land is at high flood risk, would be in direct opposition to that which the NPPF sets out to protect and preserve, and for good reason. For this reason, development on this land is not environmentally sustainable. Paragraph 175 of the NPPF states that, 'When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts)"¦' which the community is immediately able to jump in with stating that this cannot be said to be the case in the Calderdale Local Plan, as land was removed from Stainland, which is far less sensitive, in terms of the risk development would pose to wildlife, biodiversity, habitat and landscape. In this way the land in Greetland put into the Local Plan is not compliant with the NPPF. Flooding: The Land put forward in the Local Plan is unsustainable. One of the reasons for this is because it is within a high-risk flood area. This factor has not been given anywhere near enough scrutiny at the plan-making or decision-making stages. The housing estate, Woodfield Drive, to the east and in immediate contact with plot LP1077, is at a direct, increased risk of flooding. Flooding is so bad in Calderdale that the Army was called in, in February 2020, in a bid to help protect persons and property from yet another severe flood. The way in which the Calder Valley routinely experiences flooding can be best understood by Labour Council leader, Tim Swift, urging the Government to grant Calderdale urgent assistance by recognising it as a 'Tier 1' authority getting extra funding support because it is one of a small number of areas of the country at "sustained risk" of flooding.' The NPPF states that planning policies and decisions should promote public safety and take into account wider security and defence requirements by: a) anticipating and addressing possible malicious threats and natural hazards... This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.' In February 2020, our community saw Black Brook turn into a raging torrent of water that posed significant danger to both life and property. There is not a risk of flooding in this area, but a certainty of it. A certainty that grows year on year with the ever-increasing threat of Climate Change. The way in which this valley, with its steep sides, floods is a natural hazard. Residents on Woodfield Drive routinely have to take measures to prevent their homes from flooding. We have photographic evidence of how this is a routine battle that residents face, and not enough is being done to help prevent this from happening in the future. To build on this land would sign residents and the community wider community to an unbearable, unavoidable fate The NPPF states that, 'due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere.' The topography of our area would not allow for it to be any other way than to increase the risk of flooding to the existing community. The sloping grassland, the trees and the flat flood plains of the land put forward in Greetland in the Local Plan retain an immeasurable amount of water when it really matters. No amount of

'mitigation' can compete with this. To build on this land would have catastrophic and irreversible ramifications, and not just for the immediate area, but for the areas further downstream currently protected by this precious land and the way it currently functions. Residents in Bradley were in the local press this week to express their despair at how they believed a development had caused flooding to their property. This is what a spokesperson for the residents had to say in the local press, "œWe never had flooding problems when this site was a meadow and did its job as a meadow and soaked up rainfall, releasing it slowly into the woods. Due to the topography of the area and surrounding areas, we have already experience catastrophic destruction, as seen in 2015 when a major bridge, Elland Bridge, was destroyed by flood water, causing huge disruption and economic expense. Last weekend, flood water carried a shipping container, from Greetland, downstream until it eventually crashed into Elland Bridge. The Bridge had not yet been open three years since being rebuilt due to the last flood. The council had to inspect the bridge for structural damage after last weekend. How can building houses in a high-risk flood area be inline with the NPPF's golden thread of sustainability? The economic ramifications in the form of destroyed infrastructure alone is enough to void this development proposal. Prime Minister Boris Johnson has even, on multiple occasions in the press, called for councils to stop allowing building on flood plains. As a community, and as the people who experience first-hand, all year round how unpredictable the water system is in this area, we are constantly reminded of the topography of our landscape and the surrounding areas, and the impact it already has on our lives. Over thirty million pounds has so far been spent on flood defences in Calderdale, and still we are having to have the Army called in to help protect us from flood water. It is not right to build on the land in Greetland put forward in the Local Plan. Flooding cannot be mitigated against in this area. The land as it stands, is helping to prevent further disaster, and must remain as it is. To even suggest altering the way in which this land functions is an inappropriate and irreversible gamble. It is not fair to gamble with the lives of the community, when the community is so opposed to it. The NPPF states that the Local Plan should take account of climate change over a long period of time, including factors such as flood risks, changes to biodiversity and landscape. The NPPF also states that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. To so dramatically change the function of the landscape of the sites put forward for development in Greetland would completely disregard the risk climate change poses to the community on the form of flooding. For anyone to tell us that the huge volumes of water we regularly see on this land will not affect existing property when it is disturbed, we would need to see evidence of prolonged, extensive surveying carried out all year round, and for a number of years. Understanding our complex water system, further complicated by our intricate system of natural underground springs is not easily, if ever, achievable. A testament to this aspect of our topography is evident in the numerous roads and lanes named after their relationships to water and springs. Much of what causes the problems we face in this area is hidden underground in a network, or labyrinth, of fresh water springs. How can we predict how the water will behave after its usual pathways have been disrupted? We have already witnessed how smaller developments in the area, having interfered with the underground water course, have had disastrous impacts on other surrounding properties. If you would like to see photographic evidence to prove this, we have it prepared for you. Green Belt: The Green Belt Review carried out in 2017 considered all three of the sites ; reference numbers 065 and 339 in the review. The conclusion of this review was that all of the sites performed strongly in terms of their Green Belt function, meeting at least 3 of the 5 purposes of including land in the Green Belt. Those 3 purposes were: To prevent neighbouring towns from merging into one another; To assist in safeguarding the countryside from encroachment; To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The 0952 allocation was also considered to meet a further purpose in terms of checking the unrestricted sprawl of large built up areas. We would argue that all three of the sites should be considered to serve this purpose, it makes no sense for just 0952 to do so but 0177 and 1625 not to, given they are all inextricably linked. Development of all sites would result in the unrestricted sprawl of the large built up urban area of Greetland. The three site assessment reports carried out ahead of the consultation on the Local Plan Publication Draft in 2018 concluded that the land represented the "œmost sensitive Green Belt"Given this there is no planning policy justification

to ignore that impact ; importantly carried out as part of a thorough Green Belt Review of the borough just over 2 years ago ; and now consider the sites suitable for allocation for housing. Such allocation would conflict with key purposes of including land in the Green Belt and would have a fundamental adverse impact on the openness of the Green Belt. Schools: Paragraph 94 of the NPPF stares that 'It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: 28 a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and b) work with schools. promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.' The Local Plan in Greetland has not seen any of this work done in relation to the local junior schools. As far as parents and the local community is aware the local school has not been consulted on the Local Plan. Due to the fact that The Greetland Academy and West Vale School are academies, they cannot be pushed to expand, so perhaps this is why they have not been consulted, however, this is in direct opposition to the National Planning Policy Framework, and therefore not compliant. We know that the primary school is already oversubscribed. The scale of proposed development would completely overwhelm an already oversubscribed school. Children already living in Greetland may face a situation where there is no place available to them at their local junior school. There is also a very real increased risk posed to the children of Greetland Academy, should the proposed development go ahead. Paragraph 109 of the NPPF states that, 'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.' I feel that it is my civic duty and moral responsibility to inform the inspector of the current unsafe road conditions on Saddleworth Road, in the surrounding area of the school and preschool. The school is situated on Saddleworth Road, which is already a very busy road, currently with its own safety and air quality concerns. At school drop-off/pick-up times, Saddleworth is reduced to a single lane due to the parked cars of parents, and with significant and unusually high numbers of HGVs using this road, due to the recycling plant further along the road, this makes for a hostile level of traffic and congestion at busy times, and these are the times when the children of our community are on the roads and at the greatest risk. Any further increase to traffic, especially such a significant one, due to the fact that the development is proposed for this road, and this road alone, would render the road unsafe, specifically due to the number of children on the roadside. Parents already worry about the safety of their children while using this road. Those in power should be taking measures to make the road safer, not putting vulnerable children at an increased risk. When a child is killed on this road, it will be too late. Due to the level of traffic and the type of traffic, namely the large number of HGVs, this road is not suitable for Local Plan development, especially when we consider the risk it would pose to young children. On top of this increased risk of a fatal road traffic incident, the proposed development would also introduce a dramatic increase in air pollution. The proposed development would create a dangerous environment for pedestrians, with no option for mitigation. This road is unable to be made wider. To slow traffic down would only further exacerbate congestion and air pollution in the air that the community and its children have no choice but to breath. Traffic Impact: In the Council's individual assessments of the sites which resulted in them all being filtered and not taken forward for housing, the consultation from Highways England advised that the development of the scale envisaged would have a significant adverse traffic impact on the Strategic Road Network. Given this how can the sites now be put forward for allocation for housing when nothing has been done to either challenge those comments or address them? The sites in Greetland have not had traffic assessments carried out. Sites elsewhere in Calderdale have been filtered from the Local Plan due to traffic constraints. Given the existing levels of high congestion at the West Vale traffic lights, why has assessment not been carried out? Why has air pollution not been measured? Is it because the sites in Greetland are too appealing to developers, given the high house prices in the area, and some thing like a traffic assessment would throw a spanner into the works, as it were? Where is the Traffic Plan in the site reports for these sights? These sites have been allocated without appropriate assessment of local road networks. To say that the cumulative traffic impact

is being assessed is not sufficient, especially given the scale of the proposed development. To increase the amount of traffic on Saddleworth Road, when it is already so heavily congested, and with a high volume of HGVs, by any amount of traffic, without a proper assessment is not a sustainable practice in planning terms. Air pollution: My final point I ask you to consider is the impact of the development of the health of the people in this area, particularly those who live on Saddleworth Road, especially our children, who spend the majority of their waking hours in the primary school and preschool, which are both situated on Saddleworth Road. Our ward already has the highest percentage of cars per household, and this is set to rise by a disproportionately high amount, in line with the disproportionately high number of houses proposed in the plan. A development site, within Calderdale, was thrown out for precisely the same reason. Yet, our site remains, even with such a high - the highest - percentage of cars per household. Due to the lack of public transport, because we live in a semi-rural area, the community does rely heavily on transportation by car, which would unavoidably be the same case for the new residents, should the development go ahead. A wooden fence and a strip of pavement is all that separates the children from the road. A catastrophic increase in air pollution, which is in direct opposition with government legislation to reduce air pollution, is further exacerbated by the fact that Saddleworth Road is unable to manage the current level of congestion. We have extensive photographical evidence of this. Such a disproportionally high increase in air pollution will have unthinkable implications for the children of our community. If the government has set targets to reduce air pollution then it does not make sense to allocate such a vast proportion of the overall planning to one area, along one road, where the pollution in the air will become concentrated and toxic. Calderdale Council have taken steps to reduce air pollution, but the air quality in our area has not been tested. What we as a community cannot support is a huge rise in concentrated air pollution, this is air that young children are forced to breath every day on their way to and from school, and during their time at school and preschool. These young, vulnerable children will be at a significantly increased risk of developing lifelong debilitating diseases. This is an issue the government has established as a real problem. The amount of traffic in this area would increase anyway, due to other agreed development sites in neighbouring villages, like Elland. Traffic is regularly at a standstill on Saddleworth road, and with the increase of cars on this road, we can expect to see cars at a standstill as far back as the school, which at times is already the case. We have the photographs to prove this. This will result in car fumes being pumped directly, at concentrated levels, into the delicate, developing lungs of school and preschool children. Everyone in the area will be affected by the huge and disproportionate increase in air pollution, but the children will bear the brunt of the health implications. The polluted air is heavier than clean air, and thus collects closer to the ground. The knock-on effect of this is that the toxic air will fall down the hillside, and even though the school is not as close to Saddleworth Road as Sunnybank Preschool, the school children could stand to experience even worse effects. We have a duty of care to safeguard our children from breathing in such an exponentially increased level of poisonous air. The measures needed to avoid this are simple and easy to take. We can very easily protect these children. If you poison the children, you poison the future of the economy too. As stated on the World Health Organisation's official website, 'An estimated 3.7 million premature deaths are attributed to ambient (outdoor) air pollution, based on WHO data from 2012. Overall, higher urban air pollution concentrations increase the risk for cardiovascular and respiratory disease, cancer and adverse birth outcomes, and also are associated with higher death rates.' The single biggest air polluter is traffic, or road vehicles. More people die of air pollution than Malaria and HIV. For this reason, we cannot allow the toxic chemicals released by cars to increase so dramatically, and directly into the air around Greetland School and Sunnybank Preschool. The World Health Organisation explains that, 'One reasonwhy childrenare particularly vulnerable to the effects ofair pollutionis that they breathemorerapidly than adults and so absorbmore pollutants. They also live closer to the ground, where somepollutantsreach peak concentrations ; at a time when their brains and bodies are still developing.' These are points highlighted in the Clean Air Strategy 2018. While we do need to ensure economic growth, we also need to realise the 'cost of air pollution on health,' as stated in the Clean Air Strategy 2018. 'There are legal requirements and aspirational targets for levels of different air pollutants. The government recognises that protective

health - and tackling air pollution - requires action, and is committed to improving the UK's air quality and reducing harmful emissions. The draft Clean Air Strategy, published in May 2018, sets out the case for action and demonstrates the government's determination to improve our air quality.' https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-air-pollution The above is taken directly from the government websites. The proposed plan is directly opposed to the Clean Air strategy, as the amount of land allocated on Saddleworth Road is disproportionate to the amount of land Calderdale has to allocate as a whole. The overall air pollution will be harmfully concentrated on this one road, a road with an unusually high concentration of children so close by for so much time. Each child spends approximately 7 hours a day on this road, including walking to and from school, which amounts to 35 hours a week. 35 hours a week they will be forced to breath air that is exponentially more toxic than at present. This is not acceptable, and yet is totally avoidable. Again, we support the need for housing, but simply ask that it is in a place that has less impact on the health of the community, especially the health of our children. We only ask that the life that already exists in this area is respected and not jeopardised. Sustainability: At the heart of the National Planning Policy Framework is the presumption in favour of sustainable development, which should be viewed as a golden thread running through both plan-making and decision-making. In part, the NPPF requires developers to demonstrate the economic, environmental and social impacts of a development by way of a sustainability appraisal. It is the argument of the community that the sustainability appraisal conducted for the Local Plan sites in Greetland is insufficient, as the proposed development in Greetland is actually very much unsustainable. Section 11 in the NPPF outlines what is meant by the efficient use of land. It states that the Local Plan must follow planning policies and make decisions which encourage the efficient use of land by re-using land that has previously been developed (brownfield land). This has not been close to effectively carried out in the area. We have a number of undeveloped brownfield sites in the area, which have not been properly pursued. the revisions to the plan (the addition of the new sites) represents further unsustainable development with a disproportionate amount of new homes proposed across four sites in Greetland with 1,041 additional units of the 1,708 on new housing sites (over 60%) proposed in the Elland area. In particular, scrutiny needs to be made of the Council's Sustainability Appraisal process to support the release of the new sites with the site at 'Land adjacent Ellistones Place' (Ref: LP0177) the most striking example of officers reaching a

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1731** Site ref (if applicable): **LP0026**

Person ID: **959163** Name: **Mr Richard Brady** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

It should be investigated whether only sites with a developer on board have been chosen ahead of better sites without a developer. If this is the case then the Local Plan may not be legally compliant under planning law.

Do you consider the plan to be Sound?: **No**

Sound Reason:

The National Planning Policy Framework basically states Green Belt should only be developed in special circumstances, these have not been demonstrated in respect of all the Greetland sites - LP0625/LP0026/LP0952/LP0177. The above sites should be considered as one parcel as by splitting them up the effect on Greetland as a whole is made less clear. The choice of sites has not properly considered - Impact on air quality Effect on roads and lack of public transport options Lack of infrastructure and amenities - schools doctors, dentists etc Wildlife corridor in Greetland, impact on wildlife. Flooding, surface run off and sewer capacity. loss of open space for good. Location - attractive to incomers working outside the borough.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Process of reintroducing sites was not publicised or openly discussed prior.

Suggested Modifications:

Send a letter to central government refusing to accept the increased housing requirement. Revisit the plan

Comments:

Additional Evidence Link:

Comment ID **HRU1738** Site ref (if applicable): **LP0026**

Person ID: **1244133** Name: **Miss Julie Carter** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Consultation has been very poor. There has been nothingclearly available that would be appropriate for anyone with a learning disability or communication difficulties as per the Accessible Information Standard.

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREEN BELT. Why has brownfield land not been considered? Green belt should be protected and according to Calderdale Council, Greener living is a top priority. The plans put the current and future wildlife at risk. FLOOD PLAIN. Surely no one in their right mind would buy property on this site. Has the developer or anyone from Calderdale Council seen it since the beginning of February? Any flood mitigation

put in place will merely move the problem further down the area. TRAFFIC/ AIR POLLUTION. Saddleworth Road is already incredibly busy and varies in speed limits. This does not stop drivers from irresponsible driving parking, particularly around Greetland Academy. This plan would be puttingchildren's healthand safety at risk. INFRASTUCTURE. The proposed development is completely disproportionate to the size of the village. Greetland is a village not a town. The local school is full. Dentists have long waiting lists. It is already almost impossible to get a GP appointment and GP recruitment is known to be in national crisis with a crumbling A&E system as a consequence.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

This objection procedure is difficult to navigate even when computer savvy. Calderdale Council appears to be putting up as many barriers as possible to prevent people from having their say.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1739** Site ref (if applicable): **LP0026**

Person ID: **1244126** Name: **Mr Colin ASHTON** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Illogical settlement extension into the green belt of Greetland: The number of houses would be a huge addition to an area that has already seen continuous development over many years, with the resulting environmental pressure and traffic congestion. Further development could well prove to be the tipping point for Greetland's balanced community with regards to the medical, educational, environmental and socially cohesive state. From data available on the internet, Calderdale demographic information, Calderdale Council. We can see that the graph is approximately a straight line. Therefore we can extrapolate the data to 2040. This gives a projected population increase of 14500 people. The Calderdale Council quotes a housing requirement of houses 14500 houses. This suggests planning for single occupancy Increased risk of flooding: The proposed development of the fields alongside Black Brook, and further up the hillside will remove a valuable absorption area during periods of heavy rainfall. We have experienced significant flooding of the fields after they have become saturated. Building in the fields will increase the runoff into the Black Brook which feeds into the river Calder. This will increase the impact of flooding in Elland and further downstream. The effect of climate change will make flooding more frequent. Due to this, the proposed development does not adhere to NPPF Policy. Traffic congestion: There is currently a problem with the volume of traffic using Saddleworth Road. There is overspill into Rochdale Road during peak periods. Both roads are the main access routes to schools. In particular Saddleworth

Road often has standing traffic outside the gates to Greetland School Sunnybank Annex and Greetland Preschool. The resulting exhaust emissions pollute the air in and around the school and preschool. Idling car engines around schools are a well-documented cause of concern for the health of young children whose lungs are more susceptible to permanent damage as their airways are small and still developing. The British Lung Foundation recommends avoiding local pollution hot spots by walking on quieter streets. This is not possible when the stationary traffic is outside the school gates. I believe the junctions at Stainland Road with Saddleworth Road and Stainland Road with Rochdale Road are as congested as Hipperholme Crossroads (known as the Hipperholme Stand-off). At peak times, congested traffic can extend significantly further back than the school on Saddleworth Road. In addition to this, traffic is also seriously congested on Rochdale Road, and extends as far back as the community Centre. Both roads are interlinked and provide the only way out of Greetland. There simply is not enough road left to store traffic on. Both Saddleworth and Rochdale Road have to filter through the West Vale traffic lights bottleneck. Environmental: Black Brook is a special area of wildlife and biodiversity. There is the combination of Black Brook with adjoining woodland on one bank and meadows on the other bank. It is a peaceful and tranquil area where people can walk and frequently see herons fishing and the occasional kingfisher as well as numerous other species of birds. At dusk bats can be observed flitting through the evening sky. These easily identifiable creatures are an indication of a healthy natural environment with fish and insects in abundance. Once this environment is disturbed or lost the biodiversity will disappear. This is in direct contradiction to the stated Site Allocation Assessment Methodology Statement section 2.2. - "Environmental: Contributing to protecting and enhancing our natural, built and historic environment and as a part of this helping to improve biodiversity, use natural resources prudently, minimise waste and pollution and mitigate and adapt to climate change including moving to a low carbon economy. Health and wellbeing: A walk along Black Brook, meeting other members of our community and enjoying the wildlife, peace and tranquillity provides one with the opportunity to think and reflect. This is beneficial to mental health and provides a balance to the pressure of modern life, without the need to get in a car and drive to the Yorkshire Dales. It is a place of education for our children, looking for and identifying the flora and fauna that inhabit the Brook and adjacent fields and woodland. We are constantly advised to take more exercise for both adults and children. The proposed development will diminish the attraction of existing footpaths to the local and extended community, as the current landscape will be removed.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1748** Site ref (if applicable): **LP0026**

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. They 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:

LP0026 should be removed from the Plan

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610747

Comment ID **HRU1752** Site ref (if applicable): **LP0026**

Person ID: **1244133** Name: **Miss Julie Carter** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

PLEASE NOTE THIS IS COPIED AND PASTED BECAUSE MY COMMENTS WILL NOT SAVE AND I DON'T HAVE TIME TO NAVIGATE THIS TERRIBLESYSTEM No Consultation has been very poor. There has been nothingclearly available that would be appropriate for anyone with a learning disability or communication difficulties as per the Accessible Information Standard. SoundDo you consider the plan to be Sound. No GREEN BELT. Why has brownfield land not been considered? Green belt should be protected and according to Calderdale Council, Greener living is a top priority. The plans put the current and future wildlife at risk. FLOOD PLAIN. Surely no one in their right mind would buy property on this site. Has the developer or anyone from Calderdale Council seen it since the beginning of February? Any flood mitigation put in place will merely move the problem further down the area. TRAFFIC/ AIR POLLUTION. Saddleworth Road is already incredibly busy and varies in speed limits. This does not stop drivers from irresponsible driving parking, particularly around Greetland Academy. This plan would be puttingchildren's healthand safety at risk. INFRASTUCTURE. The proposed development is completely disproportionate to the size of the village. Greetland is a village not a town. The local school is full. Dentists have long waiting lists. It is already almost impossible to get a GP appointment and GP recruitment is known to be in national crisis with a crumbling A&E system as a consequence. Duty to Co-operateDo you consider that the plan complies with the Duty to Co-operate No This objection procedure is difficult to navigate even when computer savvy. Calderdale Council appears to be putting up as many barriers as possible to prevent people from having their say. Oral

Examination ParticipationIf your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? No

Do you consider the plan to be Sound?: **No**

Sound Reason:

No Consultation has been very poor. There has been nothingclearly available that would be appropriate for anyone with a learning disability or communication difficulties as per the Accessible Information Standard. SoundDo you consider the plan to be Sound. No GREEN BELT. Why has brownfield land not been considered? Green belt should be protected and according to Calderdale Council, Greener living is a top priority. The plans put the current and future wildlife at risk. FLOOD PLAIN. Surely no one in their right mind would buy property on this site. Has the developer or anyone from Calderdale Council seen it since the beginning of February? Any flood mitigation put in place will merely move the problem further down the area. TRAFFIC/ AIR POLLUTION. Saddleworth Road is already incredibly busy and varies in speed limits. This does not stop drivers from irresponsible driving parking, particularly around Greetland Academy. This plan would be puttingchildren's healthand safety at risk. INFRASTUCTURE. The proposed development is completely disproportionate to the size of the village. Greetland is a village not a town. The local school is full. Dentists have long waiting lists. It is already almost impossible to get a GP appointment and GP recruitment is known to be in national crisis with a crumbling A&E system as a consequence. Duty to Co-operateDo you consider that the plan complies with the Duty to Co-operate No This objection procedure is difficult to navigate even when computer savvy. Calderdale Council appears to be putting up as many barriers as possible to prevent people from having their say. Oral Examination ParticipationIf your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? No

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

No Consultation has been very poor. There has been nothingclearly available that would be appropriate for anyone with a learning disability or communication difficulties as per the Accessible Information Standard. SoundDo you consider the plan to be Sound. No GREEN BELT. Why has brownfield land not been considered? Green belt should be protected and according to Calderdale Council, Greener living is a top priority. The plans put the current and future wildlife at risk. FLOOD PLAIN. Surely no one in their right mind would buy property on this site. Has the developer or anyone from Calderdale Council seen it since the beginning of February? Any flood mitigation put in place will merely move the problem further down the area. TRAFFIC/ AIR POLLUTION. Saddleworth Road is already incredibly busy and varies in speed limits. This does not stop drivers from irresponsible driving parking, particularly around Greetland Academy. This plan would be puttingchildren's healthand safety at risk. INFRASTUCTURE. The proposed development is completely disproportionate to the size of the village. Greetland is a village not a town. The local school is full. Dentists have long waiting lists. It is already almost impossible to get a GP appointment and GP recruitment is known to be in national crisis with a crumbling A&E system as a consequence. Duty to Co-operateDo you consider that the plan complies with the Duty to Co-operate No This objection procedure is difficult to navigate even when computer savvy. Calderdale Council appears to be putting up as many barriers as possible to prevent people from having their say. Oral Examination ParticipationIf your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? No

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1756** Site ref (if applicable): **LP0026**

Person ID: **1244202** Name: **Mr Adam Kershaw** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

The site requirements relating to the release of the land from Green Belt is not legally compliant, adequately prepared, fully justified or consistent with National Planning Policy Framework (NPPF) and accompanying Guidance(NPPG). Procedural and Legal Compliance Issues I am concerned that Calderdale council has not adhered to legislation set out in The Climate Change Act 2008 (2050 Target Amendment). I am not able to see any evidence of additional measures to respond to climate impacts of above-trend growth in employment and housing. In addition to this, I am concerned about issues actually acknowledged by the Council itself, particularly regarding traffic impacts and flooding. For issues surrounding the proposed development, regarding traffic and flooding, it would appear that the proposal is not, according to the NPPF, sustainable.When the harm identified is taken into account, the proposals are clearly deemed unsustainable. The land in this site is also unsuitable for development due to issues relating to Green Belt and Heritage Assets, and recent planning case law determined by High Court Judgements relating to the siting of Listed Buildings.Further to this, the proposals are not supported by Housing Infrastructure Fund (HIF) from Homes England, and the inadequacy of existing infrastructure to accommodate this level of growth confirms that the proposals are unsustainable. This has even been publicly recognised by our local MP, Craig Whitaker. Flooding Certainty Part of the site is allocated as Zone 3a and is at the bottom of the chain for development, with development only acceptable if sequential and exceptions tests are passed. There have been no such tests carried out. There is evidence that the site floods both severely and routinely. The way in which this happens actually protects property and infrastructure from harm caused by flooding. Mitigation can not equal or surpass the work currently done by this land as it stands. Black Brook routinely bursts its banks, taking hold of entire expanses of meadow land, posing significant danger to both life and property. There is extensive photographic and video evidence of this. Our community begs you to recognise that there is not a risk of flooding in this area, but a certainty of it. The way in which this site faces routine flooding has been well documented on the reginal news. National news is now starting to contact the pressure group. This is something we have not gone looking for, but instead finds us, due to our level of flood risk, or 'flood certainty' as it is now known within the community. We are a small village in Calderdale Yorkshire, why are we being contacted by national media outlets? The issues we face here are real and they are huge. The entire span of land on LP0177 including South of Greetland Academy School was severely flooded in February 2020 (evidence attached). Greetland Pressure Group has attracted attention from both local and regional press and TV with regards to recent flooding and proposed development. This land routinely floods and would leave any proposed development at risk along with any access roads. Development sites LP0177, LP0026, LP0952, LP1625 are critically important in alleviating any further flooding issues by soaking and storing surface water run off from the large amount of natural springs in the area. The Army was even called into Calderdale, in a bid to help protect people and property from yet another severe flood, also in February 2020. The way in which the Calder Valley routinely experiences flooding can be best understood by Tim Swift's, Calderdale Council Leader, words when he urged the government to grant Calderdale urgent assistance. Swift would like to see Calderdale recognised as a 'Tier 1' authority, which would entitle Calderdale to extra funding support, as 'Calderdale is one of a small number of areas in the country at ''sustained risk'' of flooding.' The head of

our council has even recognised the significant threat we face in this area. The topographical context of the proposal in Greetland lends itself to increased flood risks, due to the abundance of natural springs, the water course, and the steep valley sides. All of the factors that contribute towards flooding are against us. Flooding in this part of Greetland is a certainty that grows year on year with the ever-increasing threat of Climate Change. The way in which this valley, with its steep sides, floods is a natural hazard. Residents on Woodfield Drive had to take action to prevent their homes from flooding in February 2020, and not for the first time either. We have photographic evidence of how this is a routine battle that residents face, and not enough is being done to help prevent this from happening in the future. To build on this land would be to sign residents and the community to an unbearable, unavoidable fate. The NPPF states that, 'due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere.' The topography of our area would not allow for it to be any other way than to increase the risk of flooding to the existing community. The sloping grassland, the trees and the flat flood plains of the land put forward in Greetland in the Local Plan retain an immeasurable amount of water when it really matters. No amount of 'mitigation' can compete with this. To build on this land would have catastrophic and irreversible ramifications, and not just for the immediate area, but for the areas further downstream currently protected by this precious land and the way it currently functions. Prime Minister Boris Johnson has even, on multiple occasions in the press, called for councils to stop allowing building on flood plains. Part of Site LP0177 lies within flood zone 3A ; the highest classification of flood risk in terms of land that could potentially be considered appropriate for development. The zone 3A is immediately adjacent to the western and southern boundaries of Woodfield Drive. The land immediately adjacent to the whole southern boundary of the proposed 3 allocation sites is also allocated as flood zone 3A. The photographs that are attached to this submission show the flooding that has occurred on the land. Given that the land is not only identified as being at risk of flooding but is also evidenced as having flooded, there is no justification in land drainage terms to bring these sites forward for housing. Paragraph 155 of the NPPF clearly states that, -“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk"In putting these sites forward the Council is ignoring the policy requirements of the Framework. The reports compiled by the Council for all four sites on Saddleworth Road when putting together the Publication Draft version of the Local Plan in 2018 concluded that all three should be filtered (i.e. not taken forward as housing allocations) because of ; amongst other things ; flooding and drainage issues. Sequential and exceptions tests would have been necessary to demonstrate that the sites were suitable for and safe to develop. Although the Planning Inspector identified an insufficient supply of housing land following the Stage 1 examination process, it should not simply follow that additional sites are now allocated without a thorough assessment being made as to their suitability to counter the reasons why they were initially filtered. The four sites on Saddleworth Road seem to have been put forward as a simple response to the Inspector's comments with no consideration of the flooding and drainage issues associated with the land. It is clear that there are blurred lines of responsibility and accountability when serious flooding issues arise between Developers, Councils and the Environment Agency. We need accountability when reckless planning leads to catastrophic flooding issues. Green Belt The Green Belt Review carried out in 2017 considered all three of the sites ; reference numbers 065 and 339 in the review. The conclusion of this review was that all of the sites performed strongly in terms of their Green Belt function, meeting at least 3 of the 5 purposes of including land in the Green Belt. Those 3 purposes were: To prevent neighbouring towns from merging into one another; To assist in safeguarding the countryside from encroachment; To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The 0952 allocation was also considered to meet a further purpose in terms of checking the unrestricted sprawl of large built up areas. We would argue that all four of the sites should be considered to serve this purpose, it makes no sense for just 0952 to do so but 0177, 0026 and 1625 not to, given they are all inextricably linked. Development of all sites would result in the unrestricted sprawl of the large built up urban area of Greetland. The four site assessment reports carried

out ahead of the consultation on the Local Plan Publication Draft in 2018 concluded that the land represented the -“most sensitive Green Belt"Given this there is no planning policy justification to ignore that impact ; importantly carried out as part of a thorough Green Belt Review of the borough just over 2 years ago ; and now consider the sites suitable for allocation for housing. Such allocation would conflict with key purposes of including land in the Green Belt and would have a fundamental adverse impact on the openness of the Green Belt. Erroneous justification of housing requirement for Green Belt release Green Belt boundaries should only be altered in 'exceptional' circumstances. This land has been identified as the Most Sensitive Green Belt. The CalderdaleLocal Plan, which has suffered from a democratic deficit throughout its many iterations, sets a targetfor housing based on pre-Brexit demographic evidenceofObjectively Assessed Need (OAN). 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The housing target needs revisiting to model scenarios reflective of evidenced-based jobs growth (rather than ambitions), up-to-date household projections (including post-Brexit population projections) and the priority to contribute to sustainable development that does not harm the environment (including the Council's Climate Emergency commitments). The Calderdale LocalPlan has been overtaken by events both demographically, economically and environmentally. At this point, the Council is proposing to adopt a Local Plan that runs entirely against the corporate ambitions of theauthority. It is simply the case that no plan at all (and reliance on the NPPF & NNPG to direct new developments, which wouldincludethe protection of sensitive Green Belt) would be better than theproposedLocal Planthat isunder examination. 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The site report states that the assessment of SA7 is 'Negative' and marked 'RED' commenting that ''Overall the impact is negative as the site isgreenfieldand lies within flood zones 2 and 3''. The site should be excluded on this conclusion alone, particularly within the wider context of the Council's recent declaration of a Climate Emergencyand recent flood events. Further, the report does not grapple with the issue in the overall conclusions inadequately noting that "with regards to SA7 and flood risk, the impact is negative as the site is greenfield and lies within flood zones 2 and 3" with no specific mitigation measures identified. This does not come anywhere close to an adequate assessment to justify release for development. The Sustainability Appraisal for the Local Plan has notbeenmapped or measured.The benefits of, or the opportunities for, the provision of ecosystem services by the Green Belt land directly around the urban environmentare unrecorded. Section 39 of the Planning and Compulsory Purchase Act 2004 states that a local authority exercising their plan-making functions must do so with the objective of contributing to the achievement of sustainable development. Action 5 of the EU Biodiversity Strategy to 2020 requires member states to map and assess ecosystems, whilst the Minister of State for the Environmentreiteratesthe necessity to map and value the natural capital that make up ecosystem services, specifically in urban environments, in order to improve sustainable planning. Further, the NPPF

sets out a presumption in favour of sustainable development and advises that the planning system should contribute to and enhance the naturaland local environment by a number of measures that include 'recognising the wider benefits of local ecosystems. Wildlife Paragraph 175 of the NPPF states that, 'When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts)"¦' which the community is immediately able to jump in with stating that this cannot be said to be the case in the Calderdale Local Plan, as land was removed from Stainland, which is far less sensitive, in terms of the risk development would pose to wildlife, biodiversity, habitat and landscape. In this way the land in Greetland put into the Local Plan is not compliant with the NPPF. Developer Influence Profit should not dictate planning policy, at a great cost to the environment. In relation to the rest of Calderdale, house prices in Greetland are very high. The developers have not expressed an interest in the overwhelming amount of brown field land available in Calderdale, because the return on investment is so much higher when development is passed in beautiful Green Belt land, set within a village connected to high house prices. The developer is further enabled to do this because it has a monopoly on the large-scale building development taking place in Greetland. Plans have been drawn up for the different sites within Greetland, the sites have been given different codes, and yet the land is almost entirely unseparated by anything physical; essentially, to this community, the separate plots are one piece of land, irrespective of who owns the land on the land register- the development will be concentrated in one place. Different developers have been assigned to the various codes given to our continuous area of Green Belt, however, when this is examined further, it becomes apparent that the developers largely belong to the same parent company. How can Calderdale Council resist pressure from this monopoly situation? They are already under time constraints to designate land to the Local Plan. This is a toxic situation for Calderdale, and thus renders it impossible for the council to deliver the right homes in the right places. The Local Plan in Calderdale has become entirely about developer profit, and not at all about growing the local economy for local people. Severe Lack of Infrastructure Greetland School is an Academy and therefore it is not obliged to expand. In the Council's individual assessments of the sites which resulted in them all being filtered and not taken forward for housing, the consultation from Highways England advised that the development of the scale envisaged would have a significant adverse traffic impact on the Strategic Road Network. Given this how can the sites now be put forward for allocation for housing when nothing has been done to either challenge those comments or address them? The sites in Greetland have not had traffic assessments carried out. Sites elsewhere in Calderdale have been filtered from the Local Plan due to traffic constraints. Given the existing levels of high congestion at the West Vale traffic lights, why has assessment not been carried out? Why has air pollution not been measured? Is it because the sites in Greetland are too appealing to developers, given the high house prices in the area, and something like a traffic assessment would throw a spanner into the works, as it were? Where is the Traffic Plan in the site reports for these sights? These sites have been allocated without appropriate assessment of local road networks. To say that the cumulative traffic impact is being assessed is not sufficient, especially given the scale of the proposed development. To increase the amount of traffic on Saddleworth Road, when it is already so heavily congested, and with a high volume of HGVs, by any amount of traffic, without a proper assessment is not a sustainable practice in planning terms. Heritage No assessment has been made of heritage impact The site assessment reports carried out in advance of the 2018 Publication Draft identified other areas of policy conflict with all three sites ; in particular heritage, open space and sustainability. It was at that time recommended that none of the sites on Saddleworth Road should be allocated until an assessment had been made of the heritage impact. To our knowledge that has not occurred. The sites were identified as providing valuable natural and semi-natural open space. This would be lost if the sites were allocated for housing. In terms of sustainability, a negative factor in not bringing the sites forward in the 2018 consultation was the distance to a railways station (in excess of 2kms). By definition that negative factor remains and forms part of the reason why other potential sites in the area have not been brought forward (such as site LP1089 on Rochdale Road). Open Space There would be complete loss of natural and semi-natural open space Air Pollution The homes

proposed in Greetland will significantly add to air pollution. This goes against The Clean Air strategy 2018 adopted by Calderdale Council; yet to build these houses would put our children who attend Greetland School and Sunnybank Pre-School at higher risk of ill health due to further increasing air pollution as their playground is only a couple of feet away from the already very busy congested main road which carries a lot of heavy good vehicles, due to a 24 hours recycling plant, which is only accessible by Saddleworth Road ; the road the development is intended for. Inflated housing target at the cost of great environmental harm Calderdale have based their growth on the WYCA anticipated employment figures (which is between 35,000 to 50,000 new jobs for the LeedsCity Region as a whole The Leeds City region has produced below average employment over the past 30 years but in their Strategic Economic Plan they envisage well above average growthin the next 15 years. This is extremely optimistic given that the current UNEMPLOYMENT rate in Yorkshire is 4.3% which is the second highest of any region in the UK and is currently increasing. If Calderdale's economic growth was more accurate, there would be no need to destroy precious Greenbelt land. The Council have proposed a number of alterations to its Green Belt boundaries to simply meet an inflated housing target at the cost of great environmental harm. The NPPF is clear that Green Belt should only be altered in exceptional circumstances through the preparation or review of a Local Plan. Where it is necessary to consider revision of the Green Belt, this review should be robust in its justification for any alteration ; which is critically missing. The critical importance of early and meaningful engagement and collaboration with communities in producing Local Plans, particularly where this involves altering Green Belt boundaries has not been undertaken as the site has been parachuted into the plan-making process during hearing sessions. This constitutes a seriousbreachof procedural compliance. A local pressure group has been set up at the last moment to attempt to deal with these issues locally and has attracted a significant amount of support. However, the community has not been given the opportunity to produce a Neighbourhood Plan. Neighbourhood Plans can be used by local people to positively shape development in their area, including establishing principles for how former Green Belt sites are developed. Summary All of the reasons why these sites were not brought forward at the Publication Draft stage remain just as relevant now. There has been no further assessment of any of the significant constraints which resulted in the sites being filtered at that stage. The only reason for bringing them forward for allocation now is based on a simple exercise of responding to a requirement to increase the housing supply. There is no justification for allocating these sites given the flood zone allocation and evidence of flooding and given the fundamental conflict with the Green Belt Review in 2017. No consideration has been given to the potential to bring forward other sites in the area that do not carry these fundamental problems. No consideration has been given either to the lack of infrastructure available in Greetland to accommodate such a significant level of new housing. The function of the planning system is to facilitate sustainable development that makes a positive contribution to the environment. It is not the role of the Council torecklesslyrelease demonstrably unacceptable sites within the Green Belt to meet a housing target. The Inspector's letter of 16 July 2019 to the Council notes (Para. 14) that "Local Plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits". This is theundoubtedly thecasehere.No sensible phasing options are proposed related to releaseof the most sensitive Green Belt sitesupontherequirement to demonstrate a five-year housing land supplyeven if the release could be justified. It is illogical to allocate Green Belt sites in Flood Risk Zones 2 and 3 for development before brownfield sites are fully exhausted.The immediate release of the site for development is simply not a sensitive approach to the release ofGreen Belt land even if it were to be appropriate. Later, the Inspector asked the Council to review the option of 'the supply of more suitable and available sites elsewhere'understanding this to be an option, however, the further work on the additional sites considered (incorrectly by the Council) to be 'suitable and available' are not, in fact, suitable and, in any case, it has been revealed that this option on all sites on Saddleworth Road, Greetland (identified below) is simply not sustainable and the proposal is unsound. LP0026 - The Gate Farm, Saddleworth Road, Greetland, Elland, HX48NW LP0177 - Land adjacent Ellistones Place, Saddleworth Road, Greetland, Elland, HX4 8NW LP0952 - Land at New Gate Farm, Saddleworth Road, Greetland, Elland LP1625 - Land to the west of, Silverdale Terrace, Greetland, Elland, HX4 8NQ

Do you consider the plan to be Sound?: **No**

Sound Reason:

The site requirements relating to the release of the land from Green Belt is not legally compliant, adequately prepared, fully justified or consistent with National Planning Policy Framework (NPPF) and accompanying Guidance(NPPG). Procedural and Legal Compliance Issues I am concerned that Calderdale council has not adhered to legislation set out in The Climate Change Act 2008 (2050 Target Amendment). I am not able to see any evidence of additional measures to respond to climate impacts of above-trend growth in employment and housing. In addition to this, I am concerned about issues actually acknowledged by the Council itself, particularly regarding traffic impacts and flooding. For issues surrounding the proposed development, regarding traffic and flooding, it would appear that the proposal is not, according to the NPPF, sustainable.When the harm identified is taken into account, the proposals are clearly deemed unsustainable. The land in this site is also unsuitable for development due to issues relating to Green Belt and Heritage Assets, and recent planning case law determined by High Court Judgements relating to the siting of Listed Buildings.Further to this, the proposals are not supported by Housing Infrastructure Fund (HIF) from Homes England, and the inadequacy of existing infrastructure to accommodate this level of growth confirms that the proposals are unsustainable. This has even been publicly recognised by our local MP, Craig Whitaker. Flooding Certainty Part of the site is allocated as Zone 3a and is at the bottom of the chain for development, with development only acceptable if sequential and exceptions tests are passed. There have been no such tests carried out. There is evidence that the site floods both severely and routinely. The way in which this happens actually protects property and infrastructure from harm caused by flooding. Mitigation can not equal or surpass the work currently done by this land as it stands. Black Brook routinely bursts its banks, taking hold of entire expanses of meadow land, posing significant danger to both life and property. There is extensive photographic and video evidence of this. Our community begs you to recognise that there is not a risk of flooding in this area, but a certainty of it. The way in which this site faces routine flooding has been well documented on the reginal news. National news is now starting to contact the pressure group. This is something we have not gone looking for, but instead finds us, due to our level of flood risk, or 'flood certainty' as it is now known within the community. We are a small village in Calderdale Yorkshire, why are we being contacted by national media outlets? The issues we face here are real and they are huge. The entire span of land on LP0177 including South of Greetland Academy School was severely flooded in February 2020 (evidence attached). Greetland Pressure Group has attracted attention from both local and regional press and TV with regards to recent flooding and proposed development. This land routinely floods and would leave any proposed development at risk along with any access roads. Development sites LP0177, LP0026, LP0952, LP1625 are critically important in alleviating any further flooding issues by soaking and storing surface water run off from the large amount of natural springs in the area. The Army was even called into Calderdale, in a bid to help protect people and property from yet another severe flood, also in February 2020. The way in which the Calder Valley routinely experiences flooding can be best understood by Tim Swift's, Calderdale Council Leader, words when he urged the government to grant Calderdale urgent assistance. Swift would like to see Calderdale recognised as a 'Tier 1' authority, which would entitle Calderdale to extra funding support, as 'Calderdale is one of a small number of areas in the country at ''sustained risk'' of flooding.' The head of our council has even recognised the significant threat we face in this area. The topographical context of the proposal in Greetland lends itself to increased flood risks, due to the abundance of natural springs, the water course, and the steep valley sides. All of the factors that contribute towards flooding are against us. Flooding in this part of Greetland is a certainty that grows year on year with the ever-increasing threat of Climate Change. The way in which this valley, with its steep sides, floods is a natural hazard. Residents on Woodfield Drive had to take action to prevent their homes from flooding in February 2020, and not for the first time either. We have photographic evidence of how this is a routine battle that residents face, and not enough is being done to help prevent this from happening in the future. To build on this land would be to sign residents and the community to an unbearable, unavoidable fate. The NPPF states that, 'due to recent

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Prime Minister Boris Johnson has even, on multiple occasions in the press, called for councils to stop allowing building on flood plains. Part of Site LP0177 lies within flood zone 3A ; the highest classification of flood risk in terms of land that could potentially be considered appropriate for development. The zone 3A is immediately adjacent to the western and southern boundaries of Woodfield Drive. The land immediately adjacent to the whole southern boundary of the proposed 3 allocation sites is also allocated as flood zone 3A. The photographs that are attached to this submission show the flooding that has occurred on the land. Given that the land is not only identified as being at risk of flooding but is also evidenced as having flooded, there is no justification in land drainage terms to bring these sites forward for housing. 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The site report states that the assessment of SA7 is 'Negative' and marked 'RED' commenting that ''Overall the impact is negative as the site isgreenfieldand lies within flood zones 2 and 3''. The site should be excluded on this conclusion alone, particularly within the wider context of the Council's recent declaration of a Climate Emergencyand recent flood events. Further, the report does not grapple with the issue in the overall conclusions inadequately noting that "with regards to SA7 and flood risk, the impact is negative as the site is greenfield and lies within flood zones 2 and 3" with no specific mitigation measures identified. This does not come anywhere close to an adequate assessment to justify release for development. The Sustainability Appraisal for the Local Plan has notbeenmapped or measured.The benefits of, or the opportunities for, the provision of ecosystem services by the Green Belt land directly around the urban environmentare unrecorded. Section 39 of the Planning and Compulsory Purchase Act 2004 states that a local authority exercising their plan-making functions must do so with the objective of contributing to the achievement of sustainable development. Action 5 of the EU Biodiversity Strategy to 2020 requires member states to map and assess ecosystems, whilst the Minister of State for the Environmentreiteratesthe necessity to map and value the natural capital that make up ecosystem services, specifically in urban environments, in order to improve sustainable planning. Further, the NPPF sets out a presumption in favour of sustainable development and advises that the planning system should contribute to and enhance the naturaland local environment by a number of measures that include 'recognising the wider benefits of local ecosystems. Wildlife Paragraph 175 of the NPPF states that, 'When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts)"¦' which the community is immediately able to jump in with stating that this cannot be said to be the case in the Calderdale Local Plan, as land was removed from Stainland, which is far less sensitive, in terms of the risk development would pose to wildlife, biodiversity, habitat and landscape. In this way the land in Greetland put into the Local Plan is not compliant with the

NPPF. Developer Influence Profit should not dictate planning policy, at a great cost to the environment. In relation to the rest of Calderdale, house prices in Greetland are very high. The developers have not expressed an interest in the overwhelming amount of brown field land available in Calderdale, because the return on investment is so much higher when development is passed in beautiful Green Belt land, set within a village connected to high house prices. The developer is further enabled to do this because it has a monopoly on the large-scale building development taking place in Greetland. Plans have been drawn up for the different sites within Greetland, the sites have been given different codes, and yet the land is almost entirely unseparated by anything physical; essentially, to this community, the separate plots are one piece of land, irrespective of who owns the land on the land register- the development will be concentrated in one place. Different developers have been assigned to the various codes given to our continuous area of Green Belt, however, when this is examined further, it becomes apparent that the developers largely belong to the same parent company. How can Calderdale Council resist pressure from this monopoly situation? They are already under time constraints to designate land to the Local Plan. This is a toxic situation for Calderdale, and thus renders it impossible for the council to deliver the right homes in the right places. The Local Plan in Calderdale has become entirely about developer profit, and not at all about growing the local economy for local people. Severe Lack of Infrastructure Greetland School is an Academy and therefore it is not obliged to expand. In the Council's individual assessments of the sites which resulted in them all being filtered and not taken forward for housing, the consultation from Highways England advised that the development of the scale envisaged would have a significant adverse traffic impact on the Strategic Road Network. Given this how can the sites now be put forward for allocation for housing when nothing has been done to either challenge those comments or address them? The sites in Greetland have not had traffic assessments carried out. Sites elsewhere in Calderdale have been filtered from the Local Plan due to traffic constraints. Given the existing levels of high congestion at the West Vale traffic lights, why has assessment not been carried out? Why has air pollution not been measured? Is it because the sites in Greetland are too appealing to developers, given the high house prices in the area, and something like a traffic assessment would throw a spanner into the works, as it were? Where is the Traffic Plan in the site reports for these sights? These sites have been allocated without appropriate assessment of local road networks. To say that the cumulative traffic impact is being assessed is not sufficient, especially given the scale of the proposed development. To increase the amount of traffic on Saddleworth Road, when it is already so heavily congested, and with a high volume of HGVs, by any amount of traffic, without a proper assessment is not a sustainable practice in planning terms. Heritage No assessment has been made of heritage impact The site assessment reports carried out in advance of the 2018 Publication Draft identified other areas of policy conflict with all three sites ; in particular heritage, open space and sustainability. It was at that time recommended that none of the sites on Saddleworth Road should be allocated until an assessment had been made of the heritage impact. To our knowledge that has not occurred. The sites were identified as providing valuable natural and semi-natural open space. This would be lost if the sites were allocated for housing. In terms of sustainability, a negative factor in not bringing the sites forward in the 2018 consultation was the distance to a railways station (in excess of 2kms). By definition that negative factor remains and forms part of the reason why other potential sites in the area have not been brought forward (such as site LP1089 on Rochdale Road). Open Space There would be complete loss of natural and semi-natural open space Air Pollution The homes proposed in Greetland will significantly add to air pollution. This goes against The Clean Air strategy 2018 adopted by Calderdale Council; yet to build these houses would put our children who attend Greetland School and Sunnybank Pre-School at higher risk of ill health due to further increasing air pollution as their playground is only a couple of feet away from the already very busy congested main road which carries a lot of heavy good vehicles, due to a 24 hours recycling plant, which is only accessible by Saddleworth Road ; the road the development is intended for. Inflated housing target at the cost of great environmental harm Calderdale have based their growth on the WYCA anticipated employment figures (which is between 35,000 to 50,000 new jobs for the LeedsCity Region as a whole The Leeds City region has produced below average employment over the past 30 years but in their Strategic Economic Plan they envisage well above

average growthin the next 15 years. This is extremely optimistic given that the current UNEMPLOYMENT rate in Yorkshire is 4.3% which is the second highest of any region in the UK and is currently increasing. If Calderdale's economic growth was more accurate, there would be no need to destroy precious Greenbelt land. The Council have proposed a number of alterations to its Green Belt boundaries to simply meet an inflated housing target at the cost of great environmental harm. The NPPF is clear that Green Belt should only be altered in exceptional circumstances through the preparation or review of a Local Plan. Where it is necessary to consider revision of the Green Belt, this review should be robust in its justification for any alteration ; which is critically missing. The critical importance of early and meaningful engagement and collaboration with communities in producing Local Plans, particularly where this involves altering Green Belt boundaries has not been undertaken as the site has been parachuted into the plan-making process during hearing sessions. This constitutes a seriousbreachof procedural compliance. A local pressure group has been set up at the last moment to attempt to deal with these issues locally and has attracted a significant amount of support. However, the community has not been given the opportunity to produce a Neighbourhood Plan. Neighbourhood Plans can be used by local people to positively shape development in their area, including establishing principles for how former Green Belt sites are developed. Summary All of the reasons why these sites were not brought forward at the Publication Draft stage remain just as relevant now. There has been no further assessment of any of the significant constraints which resulted in the sites being filtered at that stage. The only reason for bringing them forward for allocation now is based on a simple exercise of responding to a requirement to increase the housing supply. There is no justification for allocating these sites given the flood zone allocation and evidence of flooding and given the fundamental conflict with the Green Belt Review in 2017. No consideration has been given to the potential to bring forward other sites in the area that do not carry these fundamental problems. No consideration has been given either to the lack of infrastructure available in Greetland to accommodate such a significant level of new housing. The function of the planning system is to facilitate sustainable development that makes a positive contribution to the environment. It is not the role of the Council torecklesslyrelease demonstrably unacceptable sites within the Green Belt to meet a housing target. The Inspector's letter of 16 July 2019 to the Council notes (Para. 14) that "Local Plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits". This is theundoubtedly thecasehere.No sensible phasing options are proposed related to releaseof the most sensitive Green Belt sitesupontherequirement to demonstrate a five-year housing land supplyeven if the release could be justified. It is illogical to allocate Green Belt sites in Flood Risk Zones 2 and 3 for development before brownfield sites are fully exhausted.The immediate release of the site for development is simply not a sensitive approach to the release ofGreen Belt land even if it were to be appropriate. Later, the Inspector asked the Council to review the option of 'the supply of more suitable and available sites elsewhere'understanding this to be an option, however, the further work on the additional sites considered (incorrectly by the Council) to be 'suitable and available' are not, in fact, suitable and, in any case, it has been revealed that this option on all sites on Saddleworth Road, Greetland (identified below) is simply not sustainable and the proposal is unsound. LP0026 - The Gate Farm, Saddleworth Road, Greetland, Elland, HX48NW LP0177 - Land adjacent Ellistones Place, Saddleworth Road, Greetland, Elland, HX4 8NW LP0952 - Land at New Gate Farm, Saddleworth Road, Greetland, Elland LP1625 - Land to the west of, Silverdale Terrace, Greetland, Elland, HX4 8NQ

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Remove the Green Belt landon Saddleworth Roadfrom the Local Plan. LP0026 - The Gate Farm, Saddleworth Road, Greetland, Elland, HX48NW LP0177 - Land adjacent Ellistones Place, Saddleworth Road, Greetland, Elland, HX4 8NW LP0952 - Land at New Gate Farm, Saddleworth Road, Greetland, Elland

LP1625 - Land to the west of, Silverdale Terrace, Greetland, Elland, HX4 8NQ

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610750

Comment ID **HRU176** Site ref (if applicable): **LP0026**

Person ID: **1241858** Name: **Mr Stephen Pollacco** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

It is not the role or scope for the Council to release demonstrably unacceptable sites within the Green Belt presumably to meet a housing target

Do you consider the plan to be Sound?: **No**

Sound Reason:

Please see notes in previous section. Furthermore there does not appear to be any mitigation plans for the impact on traffic - especially when taking into account the separate LPs as in LP0177, LP0952, LP1625 plus the application 18/01189/FUL. Whilst separately each Plan may seem not to impinge on overall traffic issues - TOGETHER the impact would be beyond substantial and therefore the plans need to be looked at in their entirety and not piecemeal. Add to this air pollution near residences and a junior school (worsened by ensuing traffic jams at a critical time of day), lacking infrastructure, flooding and impact on wildlife corridors. In terms of NPPF this project is not sustainable.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Whilst I am not a legal or planning process expert I am concerned with the piecemeal treatment of significant development around Saddleworth Road (of around 700 housing units, amounting to 1400-2100 extra residents, potentially same number of vehicles) which on their own may pass individual tests but as a whole may not satisfy NPPF terms.

Suggested Modifications:

All applications/plans surrounding Saddleworth Road to be viewed collectively

Comments:

Additional Evidence Link:

Comment ID **HRU1777** Site ref (if applicable): **LP0026**

Person ID: **1244217** Name: **Mrs Helen Drake** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

No comment

Do you consider the plan to be Sound?: **No**

Sound Reason:

This proposal (LP 0026), together with the adjacent/nearby proposals LP 0177, LP 0952 and LP 1625, would result in over 23 Hectares in one essentially continuous band down one side of the valley being covered in housing. This is a grossly excessive consumption of Green Belt in a single area and cannot be considered appropriate or reasonable. These four proposed sites represent a significant and excessive increase to the area of Greetland village, and the big increase in housing numbers would result in excessive demands on the local infrastructure and services, such as schools, surgeries etc. The existing Green Belt is maintaining a green wildlife corridor, virtually right into the heart of the village. It is therefore providing a vital role in helping to maintain acceptable air quality, as well as improving wildlife diversity. The proposals are not sustainable, since there will inevitably be a vast increase in traffic. This will result in increased pollution and a detrimental effect on the environment (local and global). The West Vale road junctions are already very serious congestion problems and will only get worse, with no easy way of remediation.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Not enough has been done to make people aware that over 23 Hectares of green belt (which was excluded from the previous draft, for perfectly sound and still valid reasons) has now been reintroduced to the plan.

Suggested Modifications:

This proposed site should be removed from the proposed Local Plan. The option to reduce economic growth plans meaning less homes are needed, should be exercised.

Comments:

Additional Evidence Link:

Comment ID **HRU1784** Site ref (if applicable): **LP0026**

Person ID: **1244167** Name: **Mr Stuart Drake** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

No comment

Do you consider the plan to be Sound?: **No**

Sound Reason:

Under the NPPF, there should be no development on the Green Belt unless 'exceptional circumstances' can be demonstrated. Part of any such demonstration must be evidence that there are insufficient development opportunities on Brown Field sites. There is no convincing argument that all possible Brown Field sites within the borough have been identified and considered. An argument that developers do not like Brown Field sites is not sufficient to sacrifice vast areas of the Green Belt. Of course developers prefer Green Belt sites, since development of these gives them maximum profit. Having taken the profit, the developers move on, regardless of the effects and consequences on the local community. Developers' wishes (and greed) should not form the basis of effective and appropriate planning decisions. If some Green Belt land has to be developed, it should be done so in a sensitive manner. This proposal (LP 0026), together with the adjacent/nearby proposals LP 0177, LP 0952 and LP 1625, would represent a grossly insensitive consumption of Green Belt, whereby in excess of 23 Hectares in one essentially continuous band down one side of the valley would be covered in housing. This cannot be considered appropriate or reasonable. The four aforementioned proposed sites represent a significant and excessive increase to the area of Greetland village, which, for planning purposes, can only logically be treated as a separate entity to that of Elland. Such a massive increase in housing numbers in Greetland would result in excessive demands on the local infrastructure and services, such as schools, surgeries etc. A primary objective of the Green Belt is to prevent urban sprawl, and, as currently defined around Greetland, it is achieving that. Any argument that the Green Belt boundary would be better defined by the hard physical feature of Gate Head Lane / Scar Bottom Lane is a spurious and invalid argument. Indeed, it is almost a nonsensical argument, since it could be applied repeatedly to all subsequent physical features until, in absurdum, no Green Belt were left. Of course, the Green Belt does not need to be defined by a hard physical feature, merely by a line on a map, and, as such, it is perfectly well defined. Not only is it achieving its primary objective (of preventing urban sprawl), but it is also maintaining a green wildlife corridor, virtually right into the heart of the village. It is therefore providing a vital role in helping to maintain acceptable air quality, as well as improving wildlife diversity. The proposed development, LP 0026, together with the adjacent/nearby proposals LP 0177, LP 0952 and LP 1625, cannot be considered to be 'sustainable'. If developed, they almost certainly will not provide the type of housing that will be most needed within Calderdale in the foreseeable future. Instead, they are most likely to become commuter developments, with their inhabitants travelling to Leeds or Manchester for employment. This will result in more traffic, with subsequent increased pollution and detrimental effect on the environment (local and global). This increased traffic will also inevitably cause extra congestion at the road junctions in West Vale, which are already grossly overloaded during rush hours, resulting in excessive queuing and delays (and increase in air pollution). The extra traffic will make the situation untenable. Given the road layout and the existing buildings in West Vale, it does not seem possible that the situation could be significantly improved by any feasible alterations.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

The proposed changes to the Local plan were announced on 18 th November 2019 with the following statement: -“The council's chosen option puts an accent on greater concentration of houses within existing sites which are close to good transport links, for example within town centres, as well as identifying some new sites close to bus and rail provision. This has allowed some green belt sites to be removed from options given to councillors"¦"This statement is, at best, somewhat misleading, at worst, dishonest, since there is no mention or implication that a vast area of green belt (around Greetland) was now included within the plan. There should have been a greater effort to make people aware of the true extent of the proposed changes.

Suggested Modifications:

This proposed site should be removed from the proposed Local Plan. The option to reduce economic growth plans meaning less homes are needed, should be exercised.

Comments:

Additional Evidence Link:

Comment ID **HRU1788** Site ref (if applicable):

Person ID: **1244136** Name: **Mrs Ann Clay** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5610774

Comment ID **HRU1808** Site ref (if applicable):

Person ID: **1243413** Name: **Mrs Debbie Grundy** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

I write to strongly object to the above proposed housing development which is ill considered on the following grounds:- 1.Flood Plain This development includes building on a known flood plain. Recent weather events resulting the the flooding of adjacent fields have demonstrated that the land is not

suitable for housing development. Flooding in the UK is likely to become more common due to the effects of climate change. Building on areas prone to flooding has led to the devastating floods that have engulfed and continue to engulf towns such as Sowerby Bridge, Hebden Bridge and Mytholmroyd. Where there is a significant loss of trees and grass as would be the case in this development the ground is unable to hold and absorb water and will therefore flood. This is not an acceptable risk for our community. 2.Infrastructure The additional road traffic resulting from this proposed development will mean unsafe road conditions with traffic unable to move freely. West Vale is a huge issue in terms of traffic congestion currently and the road system is not fit for purpose. A development of this size would make journeys for local residents and other motorists using the roads intolerable. The impact of this amount of housing on our local services such schools and doctors surgeries has not been taken into account nor has the resulting pollution that this would create. 3. Environmental disturbance There will be a huge impact on the landscape with damage to the natural habitats of wildlife and resulting loss of biodiversity in the area. The cumulative effects of the above will have a significant negative impact on the local area and overload local services and amenities. This is a green belt area. The local community will be deprived of green space which is used for families as recreation and is widely recognised asnecessary for health and well being.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1817** Site ref (if applicable):

Person ID: **1245741** Name: **Ms Sue Thornton** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

LP0026 The Gate Farm Sustainable Development The planning system should support the building of affordable homes in the right places. I am not convinced that other, more suitable sites, have been fully considered. I am not opposed to limited in-filling of housing or use of 'brown-field' sites, much of this could be beneficial to a village. Unfortunately, large numbers of homes built on the edge of the community, would just lead to urban sprawl. Green fields should not be sacrificed to meet dubious housing targets. Flooding This piece of land is extremely wet. Even in normal weather, there are boggy patches with reeds growing. After a rainy spell (which we are told will be more frequent with global warming), the land floods and water can be seen bubbling up through the grass. (See attached pictures.) Under the ground, in Greetland, is a complex natural water system of springs and streams. Once this is disturbed, the water has

to find other ways to move down the valley. As has been seen previously, when homes have been built higher up, the water will suddenly spring up in the driveway or cellar of another property ; the consequences of disrupting these underground streams are unpredictable Safeguarding the countryside . Greetland is a semi-rural village with a community spirit and identity which would be damaged by building projects such as this. The site is precious farm land which should be maintained for future generations. Transport. There is no rail line and the bus service is limited, so more houses would lead to vastly increased numbers of cars. This would increase congestion ; on Saddleworth Road and at West Vale where there are already considerable queues at either end of the working day. There is no scope to redesign these junctions. Scar Bottom Lane itself is narrow and already used as a 'rat-run' at busy times further traffic would make this country lane very dangerous. There is no scope to widen it. Air Pollution Scar Bottom Lane opens out on to Saddleworth Road where there is a Pre-School and a Key Stage 1 Academy close to the roadside. The small children at these two settings would be adversely affected by the increased pollution and endangered by the larger volume of traffic. Infrastructure The infrastructure of the area cannot support a possible 67 more families, we do not have capacity in the schools or the GP surgery. It is already impossible to register with an NHS dentist. Ecology In this area there is an abundance of wild life ; fish amphibians, birds also large and small mammals (including deer). Not only will the air pollution affect them, but noise, human presence and light pollution. Added to this, the physical disturbance during the building phase could lead to the loss of many of these creatures from the area FOR EVER. As we know, any change to our ecology can lead to unforeseen consequences in years to come. Open Spaces Open space has many benefits to the community ; it is good for our mental and physical well-being. This area is used as farm-land, at present ; green fields are precious but will there be any left in 50 years time? The footpaths in this area are well used by families, dog-walkers, bird watchers etc. Please do not deprive future generations of this wonderful resource.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1819** Site ref (if applicable):

Person ID: **1245749** Name: **Revd & Mrs Leslie & Kathleen Greenwood** 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:

Comment ID **HRU1832** Site ref (if applicable): **LP0026**

Person ID: **1246092** Name: **Liz Rushby** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

There is significant water flowing down Brian Royd Lane which needs to flow down through the fields rather than into people's properties as will happen if houses are built on this land. Significant new roads will have to be built to deal with the additional traffic created by these developments. It will cause even more problems and add pressure to the facilities within the Greetland area. There is also the destruction of the environment which is home to various wild life. Plus the additional green house gases together with the loss of the trees which will need to be replaced but obviously not in the same number as there will be no spare land. How can this be good for the environment!? There is significant flooding in this area which will just be moved further down the valley causing problems to others.

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 **HRU1834** Site ref (if applicable): **LP0026**

Person ID: **1130746** Name: **Mrs Jane O'Kane** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

I feel Calderdale Council has failed in its duty to inform residents of these plans and therefore given them little time to object.

Do you consider the plan to be Sound?:

Sound Reason:

I strongly object to any development on the above site. Greenbelt NPPF paragraph 143 states: - “inappropriate development is harmful to Greenbelt and should not be approved except in very special circumstances"I have seen no evidence from Calderdale Council to justify -“special circumstances"This area is a significant area for wildlife ; bats, owls, badgers, foxes, herons, etc. If we lose this area of Greenbelt land we lose the wildlife forever. Open green spaces are important for the physical and mental well being for all. Flooding As a resident of Saddleworth Road, I am well aware of the flooding which occurred in December 2015 and again in February 2020 and the devastation it caused local residents and businesses in the area. There are numerous natural springs in the hillside from Stainland, Barkisland and Greetland which run through this land. Should the land be developed where will this water go? It will move further down the valley causing flooding to other areas. The land is a natural flood plain and as such it should be left to do its job. Congestion The junction of Saddleworth Road/Stainland Road and Rochdale Road/Stainland Road is already significantly congested. Increasing housing will just exacerbate the ongoing problems with traffic congestion and pollution. Infrastructure Local schools are already full to capacity. The local GP surgery would not cope with the extra patients. Urban Sprawl There is a risk that urban sprawl will further encroach into the surrounding countryside. This land in Greetland falls within the wider area of Elland and there is a disproportionate allocation to Greetland than other parts of the Elland region. Stainland having no housing allocation at all.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1843** Site ref (if applicable):

Person ID: **1246146** Name: **Mr & Mrs Linda & Chris Lister** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

I am writing to object to the plans being put forward for housing in Greetland. The village does not have the schools, doctors and road system to handle further development and families. Currently the primary school already has 2 classes per year and does not have space for more children. Indeed I have heard that the Sunnybank Annex applied for planning a few years ago for an extension and was knocked back at it was a GREEN BELT AREA. Getting an appointment at the doctors is a struggle at times already at the moment. Lastly driving from Greetland down to Westvale or vice versa is a very long process at peak times and would not cope with even more traffic. The area has outstanding natural beauty with numerous amounts of wildlife that thrive in the open fields and can often be seen in the early morning and evening. The land has many floodplains where the proposed houses are due to be built - which have been highlighted recently with the bad weather. Therefore, without new services - including drainage, schools and road system this proposal is unbelievably bad and should not be considered.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1847** Site ref (if applicable): **LP0026**

Person ID: **1246154** Name: **Jenni Crystal** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

I am writing to register my objections to the following planning proposals: LP0026, LP0177, LP0952 and LP1625. The four sites are incredibly close together, and stem off the same main road leading to West Vale, therefore I feel the following objection points apply to all four sites. The most critical reasons for objections are as follows: FLOOD PLAIN ; The area proposed is on a natural flood plain, and natural springs flowing down the Greetland hillside culminate at the proposed site. There is photographic evidence that local houses are subject to flooding already, so any further building would have a catastrophic effect on flooding in the local area, West Vale, Elland and beyond. I have attached photographic evidence to support this from the 9 th February 2020. Just one of two incidents when Black Brook has burst its banks in the last few weeks. There is a concerning lack of flood prevention plans in any of the four local site proposals.Building on any of these sites to the extent proposed would increase the speed of water run off massively. For the developers to state they will not build on the parts of the fields which flood is irrelevant. It is the destruction of the Green belt land that is the issue, not which part of it they are willing to build the houses on. The council should be looking at helping to slow the flow of water using natural processes , not

replacing essential greenbelt land with concrete! INFRASTRUCTURE - The infrastructure is simply not geared up to cope with 600+ houses. Traffic is already chaotic in West Vale and has been for some time. Both Saddleworth Road and Stainland road are used as alternative routes from the motorways and can hardly cope with the constant increase in traffic which will only increase over the years to come. The area could not cope with another 1200 + cars from the proposed 4 build sites in Greetland. The local school has no capacity to extend, and has expressed several times that it is not willing to extend. POLLUTION / AIR QUALITY ; The pollution caused from a further potential 1200 cars on the roads is unimaginable and the health of the Junior School children would be at a high risk as would the whole community. It is a fact that increased pollution would seriously affect the health of our children both now and in future generations. Not to mention the noise pollution that would be caused by the constant building both around and near the school. GREEN BELT ; This is green belt land and as such, should be protected. Why aren't the council considering all the 'brown field' sites as a priority? This is a wildlife corridor - there are many protected species of animals and birds in the area, and it is used as a nature walk by all the community. I appreciate that there has to be a certain percentage of new housing developments in every village and town, which is currently going on at an acceptable rate, but proposing to build 600+ houses in this area is not acceptable on any level. This would cause catastophic consequences to the area of Greetland and surrounding villages. Including the properties of current residents living close to Black Brook.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5634586 ; http://calderdale-consult.objective.co.uk/file/5634587 ; http://calderdale-consult.objective.co.uk/file/5634585 ; http://calderdale-consult.objective.co.uk/file/5634584

Comment ID **HRU1854** Site ref (if applicable): **LP0026**

Person ID: **1246060** Name: **Ms Jacqueline Peter** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

Loss is space We are a small child care business in greetland we like to be environmentally friendly and not use our cars this space is valuable area to us for walks with the children and the wildlife.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1855** Site ref (if applicable): **LP0026**

Person ID: **959343** Name: **Mr David Best** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

I am writing to object to the proposed development on the above site. The development of this site together with the planned development of sites LP0177, LP0952 and LP1625 would result in disproportionate increase in the population of Greetland resulting in a shortage of school places, an increase in traffic movement in an area which is already gridlocked at peak times. There would consequently be an increase in air pollution. In addition there would be intolerable pressure on doctors and dentists in the area. Part of the proposed overall development is to be built on a flood plane which would cause more problems further down the Calder Valley

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1861** Site ref (if applicable): **LP0026**

Person ID: **1243189** Name: **Ms Lisa Simmonds** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

The following applies to all the above sites equally: LP0177, LP0026, LP0952, LP1652 These areas are Greenbelt. This is sacred area to the local residents and is fantastic area to exercise for free, enjoy the open space, fresh air, spot wildlife, relax and get away from the stresses and strains of dailylife. It is essential this is not taken away from residents including children to enjoy. This is a rural area and must remain so. There is no excuse for building on Greenbelt land. Does the Council realise this is a wildlife corridor? Not just birds (which includes owls, kestrels and woodpeckers) there are deer, newts, bats, foxes, badgers, hares and all manner of animals live and roam here free in the knowledge they are safe, unharmed and treasured by locals. Their habitat cannot be destroyed and they cannot be safety moved without causing unduestress, anxiety and untold damage even death to these animals. They must also come before any development. All these sites are natural flood plaines and do their job well of diverting water away from houses. This is Mother Nature's work and nothing man made can compete with this so it is essential these sites are left as they are. Where would the developer divert the water to? They would just divert it to cause devastation to other Greetland, West Vale, Elland and even Brighouse residents and businesses. Current residents and businesses must come first! Has the Council seen the videos and photos of all the flooding in these Greenbelt areas? These show just how unsuitable this land is and should be removed immediately. The solution is to identify suitable brownfield sites and also to include Barkisland, Stainland and Norland in the spread of the 600 houses, as that number is disproportionate to the number of houses currently in Greetland. Greetland residents will not take this lying down and Calderdale need to put their existing residents and wildlife first before any new development.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1870** Site ref (if applicable): **LP0026**

Person ID: **1246316** Name: **Linda Barker** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

Please please stop the building plans in Greetland site No LP0177, LP0026,LP0952,LP1625 These areas are green belt. I walk around all these areas with my dog. I and my family enjoy the wildlife, I personally have seen BATS, a PAIR of HERONS, two DEERS. These areas often flood and so act as a barrier to the houses

that are near by. My doctor advises me not to take pills eg.HRT but to walk every morning in the country side for my wellbeing. This is ESSENTIAL for everyone so taking away these valuable areas for concrete building removed insects, wildlife and our mental health. Please hear my plea.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1874** Site ref (if applicable): **LP0026**

Person ID: **1243588** Name: **Mrs Kathryn Walsh** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

The plans for the following sites haven't had in depth consideration and we feel the impact on the environment and infrastructure will be huge Site no.LP0026 The Gate Farm 1.Air/noise pollution from increased traffic ,likely 2 cars per household. Will impact on congestion of traffic in West Vale at peak times. 2.Access to site-Bryan Royd Lane very narrow and also a bus route.(2 hourly) 3.Infrastucture-local schools already over subscribed, dangerous parking on main road by school already causing problems. Extra pressure on Drs Surgery,already difficulty getting appointments

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1879** Site ref (if applicable): **LP0026**

Person ID: **1246356** Name: **Peter O'Kane** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

I feel Calderdale Council has failed in its duty to inform residents of these plans and therefore given them little time to object.

Do you consider the plan to be Sound?: **No**

Sound Reason:

I strongly object to any development on the above site. Greenbelt NPPF paragraph 143 states: - “inappropriate development is harmful to Greenbelt and should not be approved except in very special circumstances"I have seen no evidence from Calderdale Council to justify -“special circumstances"This area is a significant area for wildlife ; bats, owls, badgers, foxes, herons, etc. If we lose this area of Greenbelt land we lose the wildlife forever. Open green spaces are important for the physical and mental well being for all. Flooding As a resident of Saddleworth Road, I am well aware of the flooding which occurred in December 2015 and again in February 2020 and the devastation it caused local residents and businesses in the area. There are numerous natural springs in the hillside from Stainland, Barkisland and Greetland which run through this land. Should the land be developed where will this water go? It will move further down the valley causing flooding to other areas. The land is a natural flood plain and as such it should be left to do its job. Congestion The junction of Saddleworth Road/Stainland Road and Rochdale Road/Stainland Road is already significantly congested. Increasing housing will just exacerbate the ongoing problems with traffic congestion and pollution. Infrastructure Local schools are already full to capacity. The local GP surgery would not cope with the extra patients. Urban Sprawl There is a risk that urban sprawl will further encroach into the surrounding countryside. This land in Greetland falls within the wider area of Elland and there is a disproportionate allocation to Greetland than other parts of the Elland region. Stainland

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 **HRU1892** Site ref (if applicable): **LP0026**

Person ID: **954524** Name: **Mr M Brown** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

I wish to raise an objection to the proposed building of c600 homes in the Greetland / West Vale area (Saddleworth Road, references above). The objection is principally based on the following points:- Planning, Infrastructure & Transport ; The current infrastructure in the area is already fully stretched with journey times and road capacity at significant levels. The plans have little to no capacity built in to accommodate the unprecedented increase in personal and commercial traffic that any approval would bring. The current road infrastructure could simply not cope. Any major increase in traffic would also bring significant road safety risks to the number of school children that walk through this area at peak times in the day. The combined residential capacity of the plans would bring turmoil to an already overcrowded, high-traffic area, commuter belt area of Calderdale. This is before consideration is even given to impacts on school capacities, doctor's appointments, etc in the area. Flooding ; Climate change projections strongly suggest we are going to experience more severe flooding in the future ; on this basis alone why suggest building on a naturally flood plain that allows fields to naturally flood, preventing damage to nearby homes and businesses? No amount of drainage solutions would alleviate this problem that naturally occurs in this valley. Building this amount of housing on a known flood plain that has very recently flooded (regardless of any provision for drainage) will only shift this known issue and cause unnecessary impacts on to other residents and businesses. Saving Green Belt ; This area was removed from the original plan due to this area being green belt land. Nothing has change over this time and the area continues to a wild life corridor for a variety of mammals, birds and insects. As a planet we cannot afford to lose any more of these habitats with plenty of brown or previous industrial land being available in the Borough for development. Air Quality & Pollution ; With having had 3 children already attend Greetland Academy off Saddleworth Road we've already felt first-hand the impacts of heavy commercial traffic that use Saddleworth Road (Quarry above Scammonden Dam, Sonoco Paper Mill, etc) and the environmental impacts these have on the air quality in the area. This is in addition to the already large numbers of stationary traffic on around the traffic light junctions in West Vale. This number of homes with the significant number of cars this would bring would have damaging consequences to the air quality in the area.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1900** Site ref (if applicable): **LP0026**

Person ID: **1129569** Name: **Mrs Angeline Nicholson** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Site: LP0026 The Gate Farm, Saddleworth Road Our main objections are due to the following: Flooding ; High Risk We can remember the severe flooding in the area of Ellistones Place and Woodfield Drive, Saddleworth Road, Greetland. We are extremely concerned that this will happen again, which it did on Sunday 9 th February 2020. Any proposed housing development in this area is a significant concern and is classed as a high-risk flood area. I have attached the evidence to support this. The proposed site DOES NOT meet national policy in regards to flooding. Lack of Infrastructure We are very concerned about the impact of any proposed housing development will have on Saddleworth Road and the volume of traffic. Traffic does build up each day in particular at West Vale lights. Traffic comes from the Greetland residents and also Barkisland, Ripponden, Norland, stainland. The volume of traffic is already at its peak taking us 10-15mins at peak times to get out of west vale to travel to work. Any proposed housing development would have a significant effect with the increase of the number or cars on the road in Greetland (e.g. 600 houses, most people nowadays have up to two cars per household). This is a grave concern for us and not only having a massive impact on air pollution and air quality in this area. Having young children this is a massive worry for us. We don't want more pollution ; if anything we want less pollution. We also concerned about the impact the development would have on Greetland Academy ; which is currently at full capacity. Residents ideally want their children to go to their local school ; its going to make less places available and this will have an impact whereby parents will have to drive further to different schools, hence again more air pollution. The local GP Surgery will not be able to sustain its service with an increased number of residents coming into the area. There is also currently a national shortage of GPs and Nurses across the country. The GP Surgery would have to review whether they could register the large volume of new patients to the area. The proposed development would also impact the local Dentist and whether they could accommodate new patients. Wildlife Corridor The proposed site will have a massive impact on the wildlife in the local area. There are sited owls, squirrels, bats, foxes, insects and birds in this area. This would go against your Environmental Plan in terms of protecting Green Belt and allowing wildlife to flourish and continue. Greenbelt Land According to Paragraph 80 of the NPPF Green Belt serves 5 purposes: To check the unrestricted sprawl of large built up areas. To prevent neighbouring towns merging into one another. To assist in safeguarding the countryside from encroachment. To preserve the setting and special character of historic towns To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The proposed development would contravene against the 5 Green Belt functions. This is very concerning and should be brought to your attention. Of the 17 Sustainability Assessments this allocation has 11 uncertain assessments and 4 negative assessments. This site was refused planning permission also in July 2019.

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 **HRU1906** Site ref (if applicable):

Person ID: **1242976** Name: **Mrs Lesley Pollacco** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

I am writing to object to the proposed plans for all of the above sites based on the following: - Objective 2 - TO IMPROVE SAFETY AND SECURITY FOR PEOPLE AND PROPERTY - This development will not improve this SA as there is no local police station or fire station as these have recently closed down. Increased traffic will increase the risk of RTAs. Property will be negatively effected due to the very high risk of flooding due to building on a Flood Plain. Objective 3TO CREATE AND RETAIN HEALTHY VIBRANT AND INCLUSIVE COMMUNITIES. Increased traffic and traffic jams along Saddleworth Rd from West Vale up to and past Sunnybank Primary School at peak times (at the start and end of the school day) will have a negative effect on air quality and a likely increased rise in breathing related illnesses. Both local GP surgery's are oversubscribed. Journey time to the town centre at peak times is already around 30-40 minutes. This development will only increase these times. Local primary and secondary schools are already full and 600 houses could result in an extra 40 pupils per year group, therefore pupils will have to travel outside of the area for their educational needs leading to a divisive community and further impacting on road travel. Objective 4TO ENCOURAGE INCREASED PARTICIPATION IN CULTURAL, LEISURE, AND RECREATION ACTIVITIES. 600 new houses will reduce recreational space, currently residents have green belt to walk, enjoy nature and horse ride. Objective 5TO IMPROVE ACCESSIBILITY TO ESSENTIAL SERVICES, FACILITIES AND EMPLOYMENT - These proposals will have a negative impact on the above, GP surgeries and schools are already oversubscribed (see comments above), there is no local police or fire station and there is a poor local train service 4 miles away to Manchester and Leeds which already has insufficient parking. There is an infrequent bus service to Halifax and Huddersfield which finishes early thereby necessitating car travel and all the negative impact this has on time and air quality. Objective 7TO REDUCE THE RISK OF FLOODING AND RESULTING DETRIMENTAL EFFECTS ON PEOPLE AND PROPERTY - this development will most definitely have the opposite effect, this site is a flood plain and regularly floods. I know from living on Scar Bottom Lane that houses in HX4 0HQ have flooded due to many springs lying under the ground. Objective 8TO REDUCE THE EFFECT OF TRAFFIC ON THE ENVIRONMENT Again 600 houses will each have at least one car (through necessity due to poor public transport) and this can only increase the volume of traffic. Objective 9TO PROTECT AND ENHANCE BIODIVERSITY AND GEODIVERSITY - Reducing green belt can only reduce the natural habitats of wildlife. There are also bats living around the HX4 0HQ postcode area Objective 10TO REDUCE POLLUTION LEVELS AND CO2 EMISSIONS TO TARGET LEVELS. I will reiterate that increased cars will only increase the pollution and Co2 levels, this plan will have the opposite effect of this SA. Objective 11TO PROTECT AND ENHANCE THE NATURAL, SEMI NATURAL AND MAN MADE LANDSCAPE. How can building on Greenbelt enhance the natural landscape - this proposal will have a negative effect on the natural landscape. I have been unable to post these comments on the Calderdale website even though I have registered. When I try to add a comment it says: - The event is not currently available for consultation.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1912** Site ref (if applicable):

Person ID: **956078** Name: **Mrs Pauline Hill** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5631975 ; http://calderdale-consult.objective.co.uk/file/5631974

Comment ID **HRU1920** Site ref (if applicable):

Person ID: **1246474** Name: **Margaret Stancliffe** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

Greetland Infrastructure is not adequate to cope with anymore traffic the situation now is extreme, it only takes one incident to happen & it creates chaos on our roads,also the amount of extra traffic would be perilous to people's health ,the air pollution would become so much worse than it is already endangering our young children's lives ,local schools are all at road level which makes our children very vulnerable. Green areas are also good for peoples wellbeing both mentally & physically our public footpaths are used regularly by walkers old & young, to take away our green spaces would mean more people getting in their

cars to do what they have always been able to do on their doorstep. We do not have enough SCHOOLS, DOCTORS, DENTISTS or JOBS in our local community to cater for the amount of houses that are being proposed. The land that these houses are proposed to be built on are FLOOD PLAINS. People living in the area are having to queue for long periods of time just to get through the traffic lights at Westvale which has been made even worse since the redevelopment of the area,this situation will get considerably worse if any more houses were to be built ANYWHERE else in Greetland, they are already building on the site where the Mill used to be ,which in itself is more than enough. If the proposed plans go ahead it is goodbye not only to our greenbelt but to our wildlife too, barn owls , herons kingfisher,grouse ,pheasants, bats & deer . WE NEED TO. SAVE OUR GREEN BELT. As a resident on Saddleworth Road all these reasons for not building are extremely relevant to ALL OF THE ABOVE MENTIONED SITES .

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1925** Site ref (if applicable):

Person ID: **1182596** Name: **Miss Yvette Laithwaite** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

In my opinion it is unacceptable to propose the above referenced green belt sites in the Local Plan for housing. The green belt has been passionately protected by the council and the people over many years for good reason, to protect the openness of the landscape, protect wildlife, and farmland grazing and prevent urban sprawl amongst many other things. It is unfair to both present and future generations to destroy this by allowing building on green belt land. The land in question at Greetland is a flood plain in an area of West Yorkshire that is already prone to excessive flooding. It goes without saying, this would be a disastrous place to build people's homes. I'm not sure why the council are predicting such a massive economic growth in the forthcoming years? Will Calderdale's economy grow so much, to justify building 1000 brand new houses every year, as mentioned in the latest local plan information? The area would not be able to sustain this level of house building. It's unfathomable. Calderdale would lose its soul and it's beautiful and magnificent countryside along the way. Brown field sites are available in this area and are suitable for building on. In particular the site of the old West Vale Mill which has recently been demolished. This would seem to be an ideal site to create housing for all, but instead I notice that this site has been removed from the Local Plan and is currently going through the planning process to become an elderly care facility proposed by a large corporation. There is already quite a high level of provision for the

elderly in the immediate area.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU193** Site ref (if applicable): **LP0026**

Person ID: **1130071** Name: **Mr Raymond Wilkinson** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

because the proposal does not meet the government's requirements as detailed in the NPPF

Do you consider the plan to be Sound?: **No**

Sound Reason:

Objections to use of Green Belt along Saddleworth Road This Planning Proposal goes against many of the paragraphs in the Government's NPPF. Flooding The Greetland hillside is riddled with many springs. At times of high rainfall, these can overflow onto the fields and even onto Saddleworth Road; on certain occasions causing extensive flooding. This is only likely to get worse with global warming, and the addition of many houses will reduce the absorbent effect of the fields, increasing the risk of flooding. At the bottom of the valley, the little Black Brook is likely to overflow, causing further flooding in West Vale at the bottom of the valley. Many paragraphs in the NPPF are relevant here; in particular para 148:- -“Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk."And paras 155 & 156:- -“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). -“ -“Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.-“ Other objectors have shown pictures of instances of excessive flooding in the fields and we have seen excessive water flowing down Saddleworth Road like a river. Pollution Saddleworth Road slopes downhill in an easterly direction, and the only road outlet is at West Vale traffic lights, controlling the junction with Stainland Road. This, in conjunction with the adjacent Rochdale Road/Stainland Road junction, is plagued with long traffic delays, particularly at rush hour times. Delays here can be half an hour or more, and the resulting pollution from so much traffic affects not only residents along the roads, but also two schools and several old people's homes. The addition of many houses in this proposal would increase this pollution many-fold. The NPPF is clear on this issue, e.g. para 180:- -“Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including

cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development."And para. 181:- -“Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan." Retention of the Green Belt The NPPF is clear about the need for retention of the Green Belt except under -“Exceptional circumstances" Para 133 states:- -“The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."And para 136:- -“Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period."The Planning proposal does not justify any exceptional circumstances, since there are alternative areas for additional housing, for example brownfield sites. Para 137 states:- -“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy"¦..makes as much use as possible of suitable brownfield sites and underutilised land." Infrastructure The schools, doctors and dentist are already full"”where are the proposals for increased infrastructure? I understand that the sewer system around Saddleworth Road is also near or beyond its capacity. What will be the impact of 600 extra houses? Para. 122 states:- Planning policies should take into account "¦.."the availability and capacity of infrastructure and services ; both existing and proposed ; as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use." Environment The NPPF emphasises the need for space for recreational facilities. For example, paras. 96 to 98:- -“Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate."And:- -“Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless"¦. an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements"And:- -“Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users."¦.. they should -“provide for high quality walking and cycling networks."These fields and footpaths in the Green Belt area are extensively used for recreation, and exercise: walking, cycling, etc. Other objectors have already highlighted factors such as the impact on wildlife and wildlife corridors, and the need to plant more trees. All of this demonstrates that this proposal goes against the Government's National Planning Policy Framework, as well as being unsustainable from every consideration.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

For the reasons detailed above

Suggested Modifications:

Do not build on Green Belt land, but use brownfield sites

Comments:

Additional Evidence Link:

Comment ID **HRU1938** Site ref (if applicable): **LP0026**

Person ID: **1243847** Name: **Mr John GUY** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

We are writing to express our opposition to the above sites as listed on the Calderdale Council planning portal. We have attempted to register our opposition on the planning portal and have not received an 'activation code' which means we are unable to comment on the portal. Calderdale Council have not made all residents in the area aware of the need to submit new objections to the updated plan and that these must be submitted in good time. They have a responsibility to the residents and public in general to be open and transparent and this has not been the case, nor is the process to object easy or straight forward.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Ref: Objection to the following Sites: LP0026 LP0177 LP0952 LP1625 To whom it may concern, We therefore expect this letter / email to be classed as official comment on the above 4 sites. The reasons for our opposition are as follows: 1) Disproportionate amount of building in the Greetland area . The revisions to the plan (i.e. the addition of the new sites) proves further unsustainable development with a disproportionate amount of new homes proposed across four sites in Greetland, with 1,041 additional units of the 1,708 on new housing sites within Calderdale (over 60%) proposed in the 'Elland' area. The way in which Greetland has been bundled in with other wards creates a misleading representation of the area. It is a village, not a town, why has it been included in Elland and why have other areas eg Stainland had zero land allocated? Ripponden and Rishworth are not included within Sowerby bridge or combined with a town, and therefore are represented in a fair way, which Greetland is not. Why is Greetland set out in such a way to disguise the how disproportionately the land in the local plan has been allocated? 2) Flood areas This affects the whole area. The proposed developments are situated within the flood plain of the Black Brook and are also subject to surface water flooding from the run-off from the steep hillside of the valley. This has been demonstrated very clearly at the beginning of February 2020 following Storm Ciara & storm Dennis. The Environment Secretary has stated that extreme rainfall events such as this will becomemore frequent as a consequence of climate change. Therefore, flood plains will become ever more important to -“slow the flow"and reduce the peak river levels further downstream. To build houses here is in appropriate both at a very local level and further afield. Development here on site LP 0177 will result in additional surface run off, which contributes to additional flooding. The fields currently act as a natural

flood defense. If new development is related to causing flooding to existing properties, like the houses on Woodfield Drive, the development does not comply with NPPF policy. We need to question the Council's Sustainability Appraisal process to support the release of the new sites with the site at 'Land adjacent Ellistones Place' (Ref: LP0177). This appears to be a completely unjustified recommendation. The site report states that the assessment of SA7 is 'Negative' and marked 'RED' commenting that ''Overall the impact is negative as the site is greenfield and lies within flood zones 2 and 3''. Based on this information this site should be excluded, and Calderdale has declared a climate emergency. 3) Sustainable development & Infrastructure: The function of the planning system/process is to facilitate sustainable development that makes a positive contribution to the environment. It is not the role of the Council to release demonstrably unacceptable sites within the Green Belt to meet a housing target. The existing infrastructure is not adequate to support the development on this site or at others identified within the local plan. The chronic congestion already experienced in West Vale cannot be remedied and Calderdale Council have already admitted all they can do is change the traffic light sequence. This junction is already running at over 100% capacity. More bus stops and a train station proposed in Elland will not remedy this congestion as more proposed homes will mean more people commuting. Traffic from wider areas will have to come through West Vale to get to the new flyover proposed to join the A629 Elland by-pass to reach the station. Therefore the proposed 600 houses to be built on Saddleworth Rd will cause huge problems for not only residents of Greetland but also surrounding areas. It has been reported by WSP Parsons Brinkhoff Report on Transport Network that the traffic congestion at the junction of Stainland Rd/Saddleworth Rd would increase by approx 105% and that the junction of Stainland Rd/Rochdale Rd would increase by 100%. As West Vales lies at water level this congestion will increase air pollution to health damaging levels and taking into consideration there is a school only a little way up from the junction in West Vale on Saddleworth Rd, the impact to their health will be catastrophic as the school is very near the road. It must also be taken into consideration that majority of the roads in the ward are very narrow. Scar Bottom Lane and Brian Royd being case in point. Only very small buses can travel on these roads and they are limited as to how many people they can accommodate. Putting more buses on will just increase air pollution and congestion. There currently is no space at doctor and dental surgeries in the area. Similarly the additional housing proposed will be designed with families in mind, and there is insufficient capacity at local schools. There are extremely limited public transport services in the area. 4) Greenbelt land The greenbelt is highly sensitive, due to the wildlife corridor and the way in which it acts as a natural flood defense. The public right of way runs through this stretch of greenbelt and provides the local community free access for leisure and recreation. Why has this been left in the plan when Stainland, on high ground which does not have flooding issues has been saved from the local plan? The development here in Greetland will have much greater harm due to the flooding. A labyrinth of underground springs already cause small scale developments problems. The Greenbelt is protected land which is designed to prevent urban sprawl and towns merging into one entity. Greetland and Barkisland are villages if building on the Greenbelt takes place, then there will be no distinction between them. There is no valid reason to destroy this Greenbelt land when there are brownfield sites available in the area for development. There are many mature trees on the site that need to be protected, as well as the visual amenity, these trees reduce pollution, stabilise the land reducing erosion caused by surface water at times of heavy rain. This area of greenbelt is home to numerous species of wildlife - deer, dippers, bats and countless species of insects. The wildlife & Countryside Act (as amended)1981, The Conservation (Natural Habitats &c) Regulations 1994 and the Countryside & Rights of Way (CRoW) Act 2000 are all being contravened by including this site back into the Local Plan for development. Although the Calderdale Council's Senior Planning Officer recently stated at a Local Plan Meeting that they had saved much Greenbelt, the fact is they have proposed to build on even more Green Belt in Greetland that on the previous agreed Local Plan. Indeed the inclusion of sites in Greetland including site LP0026 is the majority of Greetland's existing Green Belt. Esther McVey, the current Housing Minister's written policy on Green Belt land states -“protecting the Green Belt goes beyond protection against development"and -“Greenfield sites should not be what we turn to, not what we look at first. Every blade of grass must be looked at before it is changed."In conclusion, all other

issues which have been flagged and some highlighted by the council itself STILL remain.... Traffic impacts Air pollution Infrastructure Flooding They all just add to the fact that the proposed plan is not sustainable in NPPF terms. When the harm identified is taken into account then the proposed plans do not amount to sustainable terms. We look forward to hearing your response,

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1949** Site ref (if applicable): **LP0026**

Person ID: **1243377** Name: **Ms Jennifer Guy** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

I am writing to express my opposition to the above sites as listed on the Calderdale Council planning portal. I have attempted to register my opposition on the planning portal and have waited 5 days for my 'activation code' which has never arrived, even following a complaint email to consultsandreps@calderdale.gov.uk. Calderdale Council have not made all residents in the area aware of the need to submit new objections to the updated plan and that these must be submitted in good time. They have a responsibility to the residents and public in general to be open and transparent and this has not been the case, nor is the process to object easy or straight forward.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Ref: Objection to the following Sites: LP0026 LP0177 LP0952 LP1625 To whom it may concern, I am writing to express my opposition to the above sites as listed on the Calderdale Council planning portal. I have attempted to register my opposition on the planning portal and have waited 5 days for my 'activation code' which has never arrived, even following a complaint email to consultsandreps@calderdale.gov.uk. Calderdale Council have not made all residents in the area aware of the need to submit new objections to the updated plan and that these must be submitted in good time. They have a responsibility to the residents and public in general to be open and transparent and this has not been the case, nor is the process to object easy or straight forward. I therefore expect this letter / email to be classed as official comment on the above 4 sites. The reasons for my opposition are as follows: 1) Disproportionate amount of building in the Greetland area . The revisions to the plan (i.e. the addition of the new sites) proves further unsustainable development with a disproportionate amount of new homes proposed across four sites in Greetland with 1,041 additional units of the 1,708 on new housing sites (over 60%) proposed in the Elland area. The way in which Greetland has been bundled in with other wards creates a misleading representation of the area. It is a village, not a town, why has it been included in Elland and why have

other areas eg Stainland had zero land allocated? Ripponden and Rishworth are not included within Sowerby bridge or combined with a town, and therefore are represented in a fair way, which Greetland is not. Why is Greetland set out in such a way to disguise the how disproportionately the land in the local plan has been allocated? 2) Flood areas This affects the whole area. The proposed developments are situated within the flood plain of the Black Brook and are also subject to surface water flooding from the run off from the steep hillside of the valley. This has been demonstrated very clearly at the beginning of February 2020 following Storm Ciara & storm Dennis. The Environment Secretary has stated that extreme rainfall events such as this will becomemore frequent as a consequence of climate change. Therefore flood plains will become ever more important to -“slow the flow"and reduce the peak river levels further downstream. To build houses here is in appropriate both at a very local level and further afield. Development here on site LP 0177 will result in additional surface run off, which contributes to additional flooding. The fields currently act as a natural flood defense. If new development is related to causing flooding to existing properties, like the houses on Woodfield Drive, the development does not comply with NPPF policy. We need to question the Council's Sustainability Appraisal process to support the release of the new sites with the site at 'Land adjacent Ellistones Place' (Ref: LP0177). This appears to be a completely unjustified recommendation. The site report states that the assessment of SA7 is 'Negative' and marked 'RED' commenting that ''Overall the impact is negative as the site is greenfield and lies within flood zones 2 and 3''. Based on this information this site should be excluded! Let's not forget Calderdale have declared climate emergency! 3) Sustainable development & Infrastructure: The function of the planning system/process is to facilitate sustainable development that makes a positive contribution to the environment. It is NOT the role of the Council to release demonstrably unacceptable sites within the Green Belt to meet a housing target. The Inspector's letter of 16 July 2019 to the Council notes (Para. 14) that "Local Plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits". This is exactly the case in here in Calderdale. Later, where the Inspector asked the Council to review the option of 'the supply of more suitable and available sites elsewhere', however, the further work on the additional sites considered (incorrectly by the Council) to be 'suitable and available' are not, in fact, suitable nor available, and in any case it has been revealed that this option is simply not sustainable. Why are local brownfield sites not being used as part of the plan. The existing infrastructure is not adequate to support the development on this site or at others identified within the local plan. The road network is already operating at capacity and frequently backs up at Saddleworth Road and Stainland Road at peak times, additional traffic from the development will only exacerbate this problem further. The queuing traffic will lead to increased levels of pollution, which is of particular concern at the Greetland school site which is situated at a lower level than the road. There currently is no space at doctor and dental surgeries in the area. Similarly the additional housing proposed will be designed with families in mind, and there is insufficient capacity at local schools. There are extremely limited public transport services in the area. 4) Greenbelt land The greenbelt is highly sensitive, due to the wildlife corridor and the way in which it acts as a natural flood defense. The public right of way runs through this stretch of greenbelt and provides the local community free access for leisure and recreation. Why has this been left in the plan when Stainland, on high ground which does not have flooding issues has been saved from the local plan? The development here in Greetland will have much greater harm due to the flooding. A labyrinth of underground springs already cause small scale developments problems. The Greenbelt is protected land which is designed to prevent urban sprawl and towns merging into one entity. Greetland and Barkisland are villages if building on the Greenbelt takes place, then there will be no distinction between them. There is no valid reason to destroy this Greenbelt land when there are brownfield sites available in the area for development. There are many mature trees on the site that need to be protected, as well as the visual amenity, these trees reduce pollution, stabilise the land reducing erosion caused by surface water at times of heavy rain. This area of greenbelt is home to numerous species of wildlife - deer, dippers, bats and countless species of insects. The wildlife & Countryside Act (as amended)1981, The Conservation (Natural Habitats &c) Regulations 1994 and the Countryside & Rights of Way (CRoW) Act 2000 are all being contravened by including this site back into the

Local Plan for development. Although the Calderdale Council's Senior Planning Officer recently stated at a Local Plan Meeting that they had saved much Greenbelt, the fact is they have proposed to build on even more Green Belt in Greetland that on the previous agreed Local Plan. Indeed the inclusion of sites in Greetland including site LP0026 is the majority of Greetland's existing Green Belt. Esther McVey, the current Housing Minister's written policy on Green Belt land states -“protecting the Green Belt goes beyond protection against development"and -“Greenfield sites should not be what we turn to, not what we look at first. Every blade of grass must be looked at before it is changed."In conclusion, all other issues which have been flagged and some mitigated by the council itself STILL remain.... Traffic impacts Air pollution Infrastructure Flooding They all just add to the fact that the proposed plan is not sustainable in NPPF terms. When the harm identified is taken into account then the proposal do not amount to sustainable terms. I look forward to hearing your response,

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1954** Site ref (if applicable): **LP0026**

Person ID: **1243854** Name: **Mr Richard Field** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Calderdale Council have not made all residents in the area aware of the need to submit new objections to the updated plan and that these must be submitted in good time. They have a responsibility to the residents and public in general to be open and transparent and this has not been the case, nor is the process to object easy or straight forward. We therefore expect this letter / email to be classed as official comment on the above 4 sites

Do you consider the plan to be Sound?: **No**

Sound Reason:

The reasons for our opposition are as follows: 1) Disproportionate amount of building in the Greetland area . The revisions to the plan (i.e. the addition of the new sites) is unsustainable development with a disproportionate amount of new homes proposed across four sites in Greetland, with 1,041 additional units of the 1,708 on new housing sites within Calderdale (over 60%) proposed in the 'Elland' area. The way in which Greetland has been bundled in with other wards creates a misleading representation of the area. It is a village, not a town, why has it been included in Elland and why have other areas eg Stainland had zero land allocated? Ripponden and Rishworth are not included within Sowerby bridge or combined with a town, and therefore are represented in a fair way, which Greetland is not. Why is Greetland set out in such a way? This does not show how disproportionately the land in the local plan has been allocated? 2)

Flood areas This affects the whole area. The proposed developments are situated within the flood plain of the Black Brook and are also subject to surface water flooding from the run-off from the steep hillside of the valley. This has been demonstrated very clearly at the beginning of February 2020 following Storm Ciara & storm Dennis. The Environment Secretary has stated that extreme rainfall events such as this will becomemore frequent as a consequence of climate change. Therefore, flood plains will become ever more important to -“slow the flow"and reduce the peak river levels further downstream. To build houses here is in appropriate both at a very local level and further afield. Development here on site LP 0177 will result in additional surface run off, which contributes to additional flooding. The fields currently act as a natural flood defense. If new development is related to causing flooding to existing properties, like the houses on Woodfield Drive, the development does not comply with NPPF policy. We need to question the Council's Sustainability Appraisal process to support the release of the new sites with the site at 'Land adjacent Ellistones Place' (Ref: LP0177). This appears to be a completely unjustified recommendation. The site report states that the assessment of SA7 is 'Negative' and marked 'RED' commenting that ''Overall the impact is negative as the site is greenfield and lies within flood zones 2 and 3''. Based on this information this site should be excluded, and Calderdale has declared a climate emergency. 3) Sustainable development & Infrastructure: The function of the planning system/process is to facilitate sustainable development that makes a positive contribution to the environment. It is not the role of the Council to release demonstrably unacceptable sites within the Green Belt to meet a housing target. The existing infrastructure is not adequate to support the development on this site or at others identified within the local plan. The chronic congestion already experienced in West Vale cannot be remedied and Calderdale Council have already admitted all they can do is change the traffic light sequence. This junction is already running at over 100% capacity. More bus stops and a train station proposed in Elland will not remedy this congestion as more proposed homes will mean more people commuting. Traffic from wider areas will have to come through West Vale to get to the new flyover proposed to join the A629 Elland by-pass to reach the station. Therefore the proposed 600 houses to be built on Saddleworth Rd will cause huge problems for not only residents of Greetland but also surrounding areas. It has been reported by WSP Parsons Brinkhoff Report on Transport Network that the traffic congestion at the junction of Stainland Rd/Saddleworth Rd would increase by approx 105% and that the junction of Stainland Rd/Rochdale Rd would increase by 100%. As West Vales lies at water level this congestion will increase air pollution to health damaging levels and taking into consideration there is a school only a little way up from the junction in West Vale on Saddleworth Rd, the impact to their health will be catastrophic as the school is very near the road. It must also be taken into consideration that majority of the roads in the ward are very narrow. Scar Bottom Lane and Brian Royd being case in point. Only very small buses can travel on these roads and they are limited as to how many people they can accommodate. Putting more buses on will just increase air pollution and congestion. There currently is no space at doctor and dental surgeries in the area. Similarly the additional housing proposed will be designed with families in mind, and there is insufficient capacity at local schools. There are extremely limited public transport services in the area. 4) Greenbelt land The greenbelt is highly sensitive, due to the wildlife corridor and the way in which it acts as a natural flood defense. The public right of way runs through this stretch of greenbelt and provides the local community free access for leisure and recreation. Why has this been left in the plan when Stainland, on high ground which does not have flooding issues has been saved from the local plan? The development here in Greetland will have much greater harm due to the flooding. A labyrinth of underground springs already cause small scale developments problems. The Greenbelt is protected land which is designed to prevent urban sprawl and towns merging into one entity. Greetland and Barkisland are villages if building on the Greenbelt takes place, then there will be no distinction between them. There is no valid reason to destroy this Greenbelt land when there are brownfield sites available in the area for development. There are many mature trees on the site that need to be protected, as well as the visual amenity, these trees reduce pollution, stabilise the land reducing erosion caused by surface water at times of heavy rain. This area of greenbelt is home to numerous species of wildlife - deer, dippers, bats and countless species of insects. The wildlife & Countryside Act (as amended)1981, The Conservation (Natural Habitats &c) Regulations 1994 and the

Countryside & Rights of Way (CRoW) Act 2000 are all being contravened by including this site back into the Local Plan for development. Although the Calderdale Council's Senior Planning Officer recently stated at a Local Plan Meeting that they had saved much Greenbelt, the fact is they have proposed to build on even more Green Belt in Greetland that on the previous agreed Local Plan. Indeed the inclusion of sites in Greetland including site LP0026 is the majority of Greetland's existing Green Belt. Esther McVey, the current Housing Minister's written policy on Green Belt land states -“protecting the Green Belt goes beyond protection against development"and -“Greenfield sites should not be what we turn to, not what we look at first. Every blade of grass must be looked at before it is changed."In conclusion, all other issues which have been flagged and some highlighted by the council itself STILL remain.... Traffic impacts Air pollution Infrastructure Flooding They all just add to the fact that the proposed plan is not sustainable in NPPF terms. When the harm identified is taken into account then the proposed plans do not amount to sustainable terms. We look forward to hearing your response,

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1960** Site ref (if applicable): **LP0026**

Person ID: **1246510** Name: **Daniel Barker** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

As a lifelong resident of Greetland, I believe the construction of ANY buildings in the proposed areas listed above, would be wrong for many reasons. Firstly. This area is a flood plain and surely in the current climate we should not be even considering, putting lives at risk with the potential for more flooding. Also would the tenants be insurable? Secondly. As a natural area for wildlife including heron, bats, fish, birds of many types and an abundance of insects, surely this would have a negative effect on them. Thirdly. As the road infrastructure in lower greetland (west vale) is already in an appalling state, the prospect of adding another 1000 cars (give or take) to that daily commute route is unthinkable. I could go on with this email Eg. This is an important area for people's well-being as it's is a contributing factor to the views across the valley. And popular with walkers. The schools would not be able to cope. Etc. Etc. I hope the planning committee will see the upset this could cause locally and find a more suitable, safer, and more thoughtful position for their future plans.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2000** Site ref (if applicable): **LP0026**

Person ID: **1246546** Name: **J Taylor** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Concerning the proposed development of new housing on Green Belt land in Greetland under the Local Plan, I would like to object strongly against the development on the following grounds:- The great increase in traffic flow along Saddleworth Road with the consequent traffic at the West Vale traffic lights and the increased air pollution in the vicinity of the Greetland Academy School. As a retired professional biologist I am aware of the benefits to the local community and the above school, of the preservation of the wildlife along the Black Brook corridor. The increased pressure on local amenities such as school places and local doctor surgery availability would be total unviable. As a local resident in the adjacent area, living alongside Saddleworth Road for the past forty years, I am well aware of the seasonal flooding in the area of the proposed development. Evidence of serious flooding and the consequences, e.g the Calder Valley, indicate the dire result of possible flooding. I trust my objections to the proposed housing development will be viewed seriously and would welcome the opportunity to air my views personally with representatives supporting the development.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2005** Site ref (if applicable): **LP0026**

Person ID: **955699** Name: **Mr David Whitworth** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Such a development, on Green Belt, also on a Flood Plane, is against all planning principles. The building of 600 houses, with the additional traffic congestion, the lack of schools, GP,s and Dental Practices,and the ability to cope with the additional population, is wrong. Greetland has seen the development of at least four estates on Saddleworth Road since the early sixties, current climate changes have made it more imperative that no futher development takes place.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2050** Site ref (if applicable): **LP0026**

Person ID: **1242592** Name: **Miss Chelsey Locke** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

No. The proposal does not comply with the NPPF.

Do you consider the plan to be Sound?: **No**

Sound Reason:

The plan is not sound due to the reasons documented below: Greenbelt and wildlife ; This area is green belt, which is supposedly protected land. The NPPF states that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified and when all possible brownfield sites have been used or considered. There are brownfield sites within the area which must be considered first. There is no exceptional reason to build on this area and remove the green belt status. According to the NPPF, the fundamental aim of Green Belt policy is to prevent urban sprawl; however the building of 600+ houses would have a negative impact on this, vastly increasing the size of Greetland which is currently a semi-rural area and spreading the village closer to neighbouring villages. This is a wildlife corridor, of which many protected species of both animals and birds reside. Building on this land would destroy the natural habitat of these protected animals. The mature trees on this land help to reduce

pollution and flood risks. The current trees must be protected and additional trees should be planted here to tackle future flooding, which is inevitable. Flooding ; This area is a natural flood plain. Rain water flows down the hillside towards black brook. If this area was to be built on there would be nowhere for this water to run and soak away, resulting in the excessive accumulation of water closer to black brook. This would cause a catastrophic effect to neighbouring housing as flood water moves more rapidly towards West Vale, Elland and beyond. These areas have already suffered devastating effects of flooding, with these flood plains currently in place. Notably, the floods of Boxing Day 2015 and more recently the floods caused by Storm Ciara in February 2020. It would be incredibly irresponsible of the council to take these natural flood plains away. The NPPF, paragraph 95, states: Planning policies and decisions should promote public safety and take into account wider security and defence requirements by: a) anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area. The removal of flood plains due the proposed development would increase the risk of public safety in the area; as we have witnessed in neighbouring villages recently. Clearly this is against NPPF policy. Infrastructure ; The current infrastructure is not sufficient. An addition of 600+ houses to the area would only cause further problems. The traffic running from the village into West Vale is chaotic, this could not take an estimated 1,200 further vehicles. There is no possibility of widening roads or adding further routes towards west vale and beyond. Again, it would be irresponsible of the council to allow the increase of approximately 1200 more cars, on roads which are already congested. Saddleworth Road, of which this land lies parallel to, is the same road as which the Sunnybank Preschool and The Greetland Academy is located. An increase in traffic would greater the safety risk to children and parents attending the school. Local services, in particularly the schools are at full capacity from the current residents of Greetland. There is no mention of a further school being built for the additional children 600 houses would bring. If a further school was not going to be built, where are these children going to go? Are current resident going to be forced to send their children to schools in different areas? I know of current residents that travel to doctor surgeries in outside villages. Calderdale Council should concentrate on improving the current infrastructure instead of attempting to worsen the issue. Pollution ; The above addition of traffic would cause a substantial increase in pollution within Greetland, especially when cars are stationary in traffic with their engines on. The construction industry contributes highly to air pollution, due to operating diesel engines, working with toxic materials and dust created from the use of concrete, cement, etc. This site is incredibly close to Sunnybank Preschool and The Greetland Academy. If the development was to be permitted the children of these schools would be subject to a higher risk of developing respiratory illnesses. As stated by the World Health Organisation 'One reason why children are particularly vulnerable to the effects of air pollution is that they breathe more rapidly than adults and so absorb more pollutants. They also live closer to the ground, where some pollutants reach peak concentrations ; at a time when their brains and bodies are still developing.' It is unacceptable to put the children of Greetland at risk of serious illness.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

No. I personally received no information from the council regarding these potential developments and found out only through word of mouth. I believe Calderdale council have acted irresponsibly towards the residents of Greetland, in an attempt to put the local plan forward unnoticed.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2052** Site ref (if applicable): **LP0026**

Person ID: **1246715** Name: **Liz Smith** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Flooding As you will be aware by all the comments and evidence submitted already, this land floods. This land has flooded a number of times, just within the last month. I note that the Council has suggested 'Mitigations' against this flooding. Please bear in mind that when this land floods it PROTECTS LAND AND BUILDINGS FURTHER DOWNSTREAM. When land like this floods, it takes millions of gallons of water out of the watercourse, this then flows back into the watercourse at a later time. Any methods employed to protect houses built on this land are likely to move the problem further downstream. Do we really want more flooding in our area? Green Belt The National Planning Policy Framework (NPPF 134a) states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open and that the essential characteristics of Green Belts are their openness and their permanence. The proposed development is on Green Belt land. The Calderdale Green Belt Review in 2017 assessed the above sites and found them to be 'Most sensitive' parcels of land. The Greenbelt land which are covered by the above developments are: GB339-00 -“Parcel performs well when assessed against five Green Belt purposes. Greenfield land with agricultural use and watercourse. Parcel adjacent to settlement of Greetland."GB065-00 -“Parcel performs well when assessed against five Green Belt purposes. Greenfield land that is predominantly agricultural with some woodland. Parcel adjacent to settlement of Greetland. High potential for unrestricted sprawl-“ I read with interest that Calderdale Council has been granted funding from the Government to 'Crack down on illegal building in Green Belt' https://www.gov.uk/government/news/cash-boost-to-crackdown-on-illegal-building-on-nation-s-green-belt I wonder if this extends to cracking down on councils allowing building on Green Belt... Infrastructure The local infrastructure is already strained. To allow building of this many houses, in such a small area, would take it to breaking point. I wish that I had time to further expand on my points, but as the deadline is drawing to a close I feel that I must submit what I have!

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

I think that the Council should re-examine it's economic forecast. If the forecast was reduced to a more reasonable level, then this level of house building would not be required. Any new housing should be built

on existing brown-field land, or in small pockets so as not to lead to mass-urban sprawl.

Comments:

Additional Evidence Link:

Comment ID **HRU2058** Site ref (if applicable): **LP0026**

Person ID: **1246735** Name: **Mark Mullany** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

I do not accept the need for additional Green Belt sites to be allocated because the Council had the opportunity to revise its economic strategy to align with the minimum housing requirement originally submitted, but opted to increase its housing figure to match economic predictions which are highly uncertain and unreliable beyond the first years of the Plan. The Council's decision to pursue increased jobs and housing growth is unsustainable as evidenced by the need to allocate large areas of Green Belt land and signals a 'business as usual' approach at odds with its commitment to tackling the climate emergency. The impact of the 4 Greetland housing sites on local infrastructure especially the road network, health services and schools will be huge. The road network which would serve these sites already suffers from severe congestion problems bringing economic, social/health and environmental impacts for everyone in the area. At the same time the Saddleworth Road corridor is particularly poorly served by public transport and any initiatives to improve services will be thwarted by intensified congestion resulting from development. Sites adjoining Black Brook are known to be subject to flood risk but the real extent of this risk is highly uncertain due to rapidly advancing climate change impacts which are also adding greater risk from smaller watercourses (also present on some of these sites) and general surface water run off. The sites as a whole provide valuable wildlife habitat in the Black Brook corridor extending into the fields beyond the wildlife network defined on the proposals map. At the same time they provide a valuable recreational resource for local people. However, there are concerns that what small areas of habitat are left after development will be under too much pressure both from construction and intensified recreational use.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2067** Site ref (if applicable): **LP0026**

Person ID: **1246768** Name: **Alan Shakleton** Organisation: **Crawstone Knowl Farm**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

I should like to object to the proposals to change the status of the green belt land and wild life corridor along Saddleworth Road, Greetland, to allow the building of around 600 houses. I appreciate the need for a number of new homes, but building 600 houses in this area of open green belt would have a major impact on the area, impact on health and wellbeing and have a detrimental effect on traffic, schools, health services, and infrastructure. I would urge the Council to drastically reduce the proposed number of new homes to minimize the detrimental impact on the area.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2072** Site ref (if applicable): **LP0026**

Person ID: **1246744** Name: **Mr Steven Reed** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Do you consider the plan to be legally compliant for site LP0026? No - I do not believe the plan to be legally compliant for the following reasons: With reference to: National Planning Policy Framework: 2019, paragraphs 133, 134, 155 - 165, 181 Government White Paper -“Fixing Our Broken Housing Market"WSP Parsons Brinckerhoff Report Calderdale's Vision 2024 Strategy I cite the following reasons as to why site LP0026 should be removed from the Local Plan: Its inclusion demonstrates that the plan has not been positively prepared, cannot be justified, and is not consistent with national policy. Exceptional circumstances' to change the classification of LP0026, making it eligible for development to not exist, the circumstances have not been satisfied. There is no evidence to suggest that thorough scoping, investigation or consultation to identify brownfield sites has taken place. -“Lack of developer interest" is not listed as valid reason exclusion of a brownfield site from the Local Plan. Consultation has been lacking

in clarity and honesty. Re-entering site LP0026 into the Local Plan without final scrutiny from Ward Councillors and without pre-consultation engagement is not transparent. Labelling site LP0026 as being part of Elland is misleading (Elland has separate identifiable amenities and postcode). This demonstrates that the plan has not been positively prepared. Lack of adherence to current policy and legislation on flooding makes the plan unjustifable as the development does not pass the -“exception test" (NPPF: 2019); the development is not only at risk of flooding itself, but without further assessment cannot be rules out from putting other communities at risk of future flooding. There is no evidence to show that site LP0026 will not be needed to form part of future flood prevention or alleviation works. This demonstrates that the plan is not sustainable.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Do you consider the plan to be sound? - No - I do not believe the plan to be sound. With reference to"¦. National Planning Policy Framework: 2019, paragraphs 133, 134, 155 - 165, 181 Government White Paper - “Fixing Our Broken Housing Market" WSP Parsons Brinckerhoff Report Calderdale's Vision 2024 Strategy ... I cite the following reasons as to why site LP0026 should be removed from the Local Plan. It's inclusion demonstrates that the plan has not been positively prepared, cannot be justified, and is not consistent with national policy. I make these statements with reference to the National Planning Policy Framework: 2019: "Exceptional circumstances" for development on LP0026 Local Plan have not been satisfied. Full examination of other sites has not been evidenced. Brownfield sites or increasing the density of other sites has not been thoroughly examined, evidence of any thorough investigation is lacking. Justification of changing the greenbelt boundary is lacking. Development of site LP0026 would create "urban sprawl". Reducing open space contravenes the purpose of greenbelt. For these reasons the plan is not sustainable. There is an existing need to reduce the chronic congestion in West Vale. The development would not reduced traffic nor alleviate existing issues. There is no evidence to demonstrate how the increase in traffic through the West Vale junctions would be managed. The existing situation would be worsened rather than improved by the development. The creation Elland train station would not reduce congestion in this area, rather put more strain on the current road network due to increased traffic through the area. For these reasons the development is not sustainable. Declaration and the need to respond proactively to the Climate Emergency (as declared by the Council) overrides the need to develop site LP0026 due to the importance of the needs for clean air management and the creation of clean air zones. Increased emissions resulting from the cars which reside in the development does not support the clear air management strategy. This further demonstrates that the plan is not sustainable. Classification of site LP0026 making it a Class 1 FLood Risk should be reviewed. There is no evidence to show that site LP0026 will not be needed in future flood prevention or alleviation schemes. The impact of climate change cannot be accurately assessed until thorough analysis on the impact of the February 2020 floods has taken place. There is no evidence to show that the site can be safeguarded from flooding in the future nor that the development will not increase the risk of flooding in other communities along the RIver Calder. Without review of Calderdale's Flood Management Strategy the Council cannot state that the plan is sustainable. Lower flood risk sites are available in Neighbouring areas, these should be examined and considered for development ahead of site LP0026. There is no evidence to demonstrate that this investigation has taken place. Financial forecasting used to determine the number of houses is not sound and should be revised. It has not been positively prepared, is not justified, and is not consistent with national policy: The additional number of houses added into the plan between October 2019 and January 2020 were added to due feedback from the inspector, it was not Calderdale Council's original desire to build so many houses, meaning the figure has been created to fit a target rather than an actual need. The financial forecast now be reviewed inlight of unplanned expenditure resulting from the February 2020 flood recovery project, and in turn reduce the number of houses required. Moreover, the economic forecast could not reliably forecast the impact of leaving the European Union as the date of leaving had not been determined when the forecast was made.

The reasons cited above are a demonstration of why LP0026 in the Local Plan is not sustainable nor justifiable for development. The plan cannot be deemed as sound when sustainability is a key factor in the National Planning Policy Framework, 2019.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2075** Site ref (if applicable): **LP0026**

Person ID: **1246735** Name: **Mark Mullany** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

The Parish Council recognises the importance of having a Local Plan adopted to meet the future needs of communities including housing and employment in a sustainable way. To this end it is understood that it is necessary for the Local Plan to be found 'sound' in terms of national planning guidance at its examination in public by the Planning Inspector. However, while the proposals do not impact directly on the Stainland Parish, the extent of Green Belt loss proposed for new housing at 4 sites in Greetland and Elland is considered excessive and unsustainable both in terms of loss of natural environment and landscape character and also in terms of the vastly increased burden it would place on local infrastructure, including the road network, local health services and schools. The road network which would serve these sites already suffers from long standing congestion problems with its attendant economic, social and environmental impacts for everyone in the area including people in the Stainland Parish needing to travel via West Vale to Halifax, or other locations. The Saddleworth Road area of Greetland where the 4 large additional housing sites are proposed is poorly served by public transport and while more housing could in theory increase viability of services, these will continue to be unattractive if congestion problems are exacerbated by large scale development. The Parish Council understands that the levels of employment growth projected by CMBC need to be matched by appropriate levels of housing provision. However, it is noted that CMBC has recognized the many uncertainties associated with long term economic projections and as a result has factored in a reduced level of provision over the last five years of the plan (910 per annum for last five years compared to 1,040 per annum for first ten years). The Parish Council would advocate this approach be extended further, such that further reductions in the housing figure could be made to reflect uncertainty beyond the first five year period at which point a review of the Plan will be due.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2094** Site ref (if applicable): **LP0026**

Person ID: **1129718** Name: **Mr Malcolm James** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

I wish to object to the proposed revised version of the Local Plan and these comments relate to the sites LP0952, LP1625. LP0177 and LP0026. I understand these have been added by the Council to meet a need presented by the inspector. In simple terms the economic objectives proposed by the Council were not supported by enough new housing in the area to support the increased population, which in part is thought would be attracted by the increased work opportunities. Thus it is a case of amending the economic profile or adding housing to meet an envisaged demand. The core of my objection to these additional sites is based on the numbers used in developing the original concept. There was a projection of a nett employment increase in the area of 8,295 jobs. The period concerned covers 2016 to 2032. Several elements of this figure seem to me to hold no logic at all. I will give several examples from the chart provided for the evaluation of the economic development. An estimated increase of 898 jobs in the combined retail and wholesale. Calderdale is not a location where large distribution facilities will be built. The geography and roads do not attract this activity which is evident by the almost total absence now of these companies. Retail in the towns of Calderdale are not likely to see any growth, holding the present job total would be considered a success. Health, not including care of the elderly, and residential care homes, shows an increase of 902 jobs. I am not certain of the present figure but I do know that about 4 years ago the local Hospital Trust were confident that they could reduce their non-medical staffing total by a rather similar figure based on new technology and greater efficiency of the analytical procedures of testing processes. This was never proved to be the case and thus the additional employment in this area is suspect particularly that the work was split between Calderdale and Huddersfield. Public services shows an expected increase of 3183 jobs. This I am sure will cover the range of such work as prevails in the public sector now. I find it difficult to believe that such a dramatic increase will occur in these years rather improbable. We have spent years reducing the staff and again increasing to this degree seems improbable. This is not a creditable figure foe increased employment. I fear that in reality that if the land is given over to housing development the majority of the owners of the new properties will not be people employed in Calderdale but people working in particularly Leeds, Bradford or Manchester. The proximity of the M62 and the prospect of improved train services will be a great attraction for easy development opportunities,

not only for those employed in Calderdale. Other considerations relate to the local environment; there is in addition no realistic possibility of improving the traffic flow or pollution on any of the immediate road networks. The roads are bounded on all sides by existing development and there is no point in spending millions on compulsory purchase to widen a road for a short distance merely to move the traffic jam a few hundred meters in either direction. I have chosen not to add to the comments about the green environmental damage or the flooding but fully support those who have. Development in this area would be a bad choice for reasons that hold no logic at all, other than meeting a numerical target, and I would request the proposal are rejected.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2095** Site ref (if applicable): **LP0026**

Person ID: **1243337** Name: **Mrs Nicola Reed** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Do you consider the plan to be legally compliant? No - I do not believe the plan to be legally compliant for the following reasons: "Exceptional circumstances" to exclude LP0026 from the GreenBelt do not exist - the plan has not been positively prepared, cannot be justified, and is not consistent with national policy. Both the National Planning Policy Framework: 2019, p 137 and the Government White Paper "Fixing Our Broken Housing Market: 2017 "state that criteria must be satisfied in instances where current a greenfield site is to be exempt from GreenBelt policy by way of changing the boundaries of the site to enable development in a particular area. These criteria have not been satisfied - the exceptional circumstances to include site LP0026 in the Local Plan have not been met. Moreover, there is no evidence to show that thorough scoping, investigation or consultation has taken place to identify brownfield sites in the area which could be used to support either the removal of site LP0026 from the Local Plan, or to reduce the density/capacity of the site. "Lack of developer interest" has been cited by Local Authority Planning Officers as a reason for not including some brownfield sites in the Local Plan. Neither the National Planning Policy Framework: 2019, or the Government White Paper "Fixing Our Broken Housing Market" cite this as a valid reason to exclude a site from being included in the Local Plan. Lack of community consultation Re-entering site LP0026 into the Local Plan without scrutiny from Ward Councillors demonstrates lack of honesty and transparency. Pre-consultation engagement regarding the inclusion of site LP0026 has not taken place. Lack of clear communication The labelling of site LP0026 along Saddleworth Road as being part of Elland is misleading. Elland is a town in its own right, with its own amenities, having its own postal district code, seperate to Greetland. A Greetland resident would not identify as site LP0026 being part of Elland. This makes the Local Plan document unclear and misleading. WIth reference to the "Calderdale Statement of Community Involvements: 2015: 1.2" which calls for information to be communicated clearly and with

clarity, the Local Plan consultation process has not adhered to the principles set out in this document. Lack of adherence to current policy and legislation on flooding According to the National Planning Policy Framework: 2019, paragraphs 155 to 165, new developments should not take place in flood risk areas, and in exceptional circumstances where permission is granted, the development should not pose a detrimental effect on other communities which puts them at risk of flooding. It is widely recognised that due to global warming, instances of flooding will become more common and more widespread across Britain, this is especially the case in areas which have the topography of Calderdale. It cannot factually stated that the inclusion of the land in site LP0026 in the Local Plan will not have a detrimental effect on other areas of Calderdale which lay along the River Calder and will not cause them to suffer from the effects of flooding. Moreover, following the floods of 09/02/2020 thorough investigation work needs to take place into future flood prevention.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Do you consider the plan to be sound? No - I do not believe the plan to be sound for the following reasons: "Exceptional circumstances" for including LP0026, in the Local Plan have not been met. Lack of evidence is available to show that strategy makers have fully examined all other reasonable options before including site LP0026 into the Local Plan. Options being; consideration of brownfield sites or increasing the density of other new sites/increase the density of existing sites. Moreover, site LP0026 should be removed from the Local Plan as the exceptional circumstances stated in the National Planning Policy Framework: 2019, p 137 for the amendment of GreenBelt boundaries to allow for the development of this site have not been met. The inclusion of site LP0026 cannot be justified. As the exceptional circumstances to change the GreenBelt boundary to exclude site LP0026 and therefore enter it into the Local Plan have not been met, consideration should be given to the 5 purposes of GreenBelt which are listed in paragraphs 133 to 134 for the National Planning Policy Framework: 2019. Development on site LP0026 would lead to the creation of "urban sprawl" which completely contravenes the purpose of retaining open, accessible spaces. The inclusion of this point is relevant as the exceptional circumstances have not been met and therefore examination of the purpose of GreenBelt and the detrimental effect the development of site LP0026 have been listed below to support the above argument: Current chronic congestion in West Vale would not be alleviated. The National Planning Policy Framework: 2019, paragraph 102 states that developments should avoid and mitigate against any adverse effects a development could have on transport infrastructure. There is no evidence to demonstrate that congestion in West Vale would be alleviated as a result of development, rather the existing issues would be worsened. The WSP Parsons Brinckerhoff Report states that congestion at the junction of Stainland Road and Saddleworth Road would increase by 105% should the development go ahead at site LP0026. The report also states that congestion between Rochdale Road and Stainland Road would increase by 100%. This evidence demonstrated that an adjustment to West Vale traffic lights would not remedy the existing congestion and therefore development will not remedy existing problems but intensify the issue. The planned train station at Elland will not alleviate congestion, as people using the station will need to access it by travelling from the development at site LP0026 through West Vale. These points demonstrate that the infrastructure surrounding site LP0026 would be unable to cope should the development go ahead. Lack of infrastructure shows that any development at site LP0026 would be unsustainable and not in the spirit of the National Planning Policy Framework:2019. Declaration of a Climate Emergency within Calderdale overrides the need to development a greenfield site: The importance of clean air management and creation of clean air zones are described in the National Planning Policy Framework: 2019, paragraph 181. Calderdale Council has declared a climate emergency across the Borough and is undertaking significant road improvements in an attempt to combat the effects of car emissions in the area. The creation of urban sprawl at site LP0026 would lead to a largely increased number of cars travelling along Saddleworth Road and through the junctions in West Vale. As detailed above, the chronic congestion in West Vale will be worsened by the development of site LP0026 and again

demonstrations that the Local Plan is not sustainable. Wrong classification of site LP0026 in terms of flood risk, the Local Authority cannot accurately predict the impact climate change will have upon the Borough at this point in time: Paragraphs 155 to 165 of National Planning Policy Framework: 2019 state that building in flood risk areas or where a development may have a cumulative impact upon local areas which are susceptible to flooding should be avoided. Developments should be made safe for their lifetime protecting them and surrounding areas against flooding. The National Planning Policy Framework further states that where development in flood risk areas is necessary, exception tests must be satisfied, demonstrating that the development would provide wider sustainability benefits that outweigh any risk of flooding and not increase the risk of flooding elsewhere. It is widely acknowledged that flooding will become more widespread and frequent both nationally and regionally. Because of this, creating a new development on site LP0026 contravenes paragraphs 155 to 165 of the National Planning Policy for a number of reasons: It is unknown what increased risk to flooding the development would have on existing settlements (West Vale, Elland, Brighouse) that lay along the River Calder (which the Black Brook running through site LP0026 feds into). The Authority cannot confidently state that the development will be safeguarded against flooding without further assessment and advice from The Environment Agency. The impact of the 09 February 2020 floods is yet to be fully understood, with a major incident being declared it is reasonable to suggest that the Strategic Flood Management Strategy be reviewed. With any such review pending, the Authority is currently unable to determine whether site LP0026 will be required in future flood prevention or alleviation schemes. Other, lower flood risk sites are available within HX4, these should be considered before developing on higher impacting sites. A development on site LP0026 will not provide wide sustainable benefits to either the immediate or wider area which outweigh the potential flood risk posed to existing settlements along the River Calder. The Exception Test as described in the National Planning Policy Framework: 2019 has not been passed and therefore development should not be permitted. Loss of GreenBelt & Wildlife Corridor Building on the GreenBelt site LP0026 does not support the implementation of the Adult Health & Social Care Scrutiny Board report which states there is a need to retain green spaces for the overall health and wellbeing of residents. The Defra 25 year environment plan clearly states the importance of protecting ancient woodlands and grasslands, high risk flood areas and quality agricultural land. The development of site LP0026 conflicts with the purposes of GreenBelt land as laid on the National Planning Policy Framework: 2019. The Council's Vision2024 Strategy stresses the importance of creating a Borough where people and places flourish. The development of this site; the loss of open space and instead creation of urban sprawl would have a detrimental effect on the wellbeing of residents who live in the area and those who visit for leisure purposes. The deeper impact of this is on tourism to the area; less tourists less income. The National Planning Policy Framework: 2019 states that any impact of removing land from the GreenBelt must be offset with compensatory improvements to the environment's quality and accessibility to the site must not be adversely affected. This begs the questions - why destroy a diverse wildlife habitat to recreate it elsewhere? Access to the site is already difficult due to congestion in West Vale, additional traffic moving too and from the site would not result in any improved transport links being established. Financial forecasting used to determine the number of houses is not sound and should be revised. It has not been positively prepared, is not justified, and is not consistent with national policy: Any proposed house building project should be based on an outstanding need for housing, rather than an economic projection. With reference to points 2.2, 3.3 and 4.1 in the Local Plan, I question what 'assumptions' the economic forecast has been made on. The additional number of houses added into the plan between October 2019 and January 2020 were added to due feedback from the inspector, it was not Calderdale Council's original desire to build so many houses, meaning the figure has been created to fit a target rather than an actual need. The financial forecast now be reviewed inlight of unplanned expenditure resulting from the February 2020 flood recovery project, and in turn reduce the number of houses required. Moreover, the economic forecast could not reliably forecast the impact of leaving the European Union as the date of leaving had not been determined when the forecast was made. For these reasons the economic forecast should be reviewed to check its soundness. The reasons cited above are a demonstration of why the Local Plan is not sustainable nor justifiable. The plan cannot be deemed as

sound when sustainability is a key factor in the National Planning Policy Framework, 2019.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2096** Site ref (if applicable): **LP0026**

Person ID: **960330** Name: **Christopher & Brenda Smith** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

Please, please, please can we save 'Our Greenbelt'. At this moment in time 'Greetland's Greenbelt'. We have lived in Greetland for 38 years, in the same house. A neighbour 38 years ago told us there were a lot of underwater streams in Greetland. Autumn/Winter 2019 saw gardens in our avenue flooded for the first time! We have had visits from the sewerage people, Calderdale Council and Yorkshire Water. Consequently four weeks ago two of our neighbours had their gardens dug up. Hopefully Calderdale Council will re-imburse our neighbours to restore their gardens to pre-flooding condition. As it is more than likely that this flooding is a result of five houses being allowed to be built on Moorbottom Road! We like walking around Greetland's countryside and have noticed in the last two or three years how two wells have dried up. There was a spring down it's namesake Spring Lane, sadly it is no longer there. The stone trough exists but no water runs into it. Also the spring down Scar Bottom Lane has also dried up. Where is the water going? It has to go somewhere!!! I hope the Council will be held accountable for their decisions if the loss of this greenbelt goes ahead. The consequences of the loss of this greenbelt are ; more flooding, more traffic congestion, air pollution will rise. There will be a rise in noise and light pollution all leading to a rise in mental health issues which in turn all contribute towards 'climate catastrophe'!!!! There will be an increase in the demand on our local GP Surgery, the Dentists and Greetland's Primary School. The present infrastructure cannot cope with another 600 houses. Possibly another 600 children wanting to attend Greetland Primary School. I accept there is a need for more housing but before we dig up our beautiful countryside, our green fields which lie in the greenbelt, let's build on our brownfield sites, convert empty buildings into apartments and houses. Let's ensure all empty houses are occupied. I know of one detached family house in the Elland area which has been empty for years. Bought presumably as an investment! The houses proposed will not be for low income families, first time buyers or older people who want to downsize and which will free up family homes already in the Greetland area. They will be four and five bedroomed detached houses to accommodate people working in Leeds, Manchester.....to maximise profits

for the developers. Building on greenfield sites is easier for the developers and again maximises profits! But once these green field sites are bulldozed then there is no going back. The 600 houses will produce an extra 1,200 cars. There will be more air and noise pollution. There could potentially be 600 extra lawn mowers going in the summer months. The loss and damage to our wildlife, which is irreplaceable, their habitats gone forever. Light pollution. Dark skies are becoming fewer and further between. There is so much history connected to our skies. We need to conserve what we have. Building on our greenbelt will exacerbate 'mental health' issues. Open green spaces give people a sense of well being, happiness, contentment. Space to be able to 'stand and stare' and breathe in the natural air free from too much pollution. I quote a passage from the National Trust Magazine: 'We all want quiet. We all want beauty.... We all need space. Unless we have it, we cannot teach that sense of quiet in which whispers of better things come to us gently.' Octavia Hill 1883 Co-founder of the National Trust. She had a desire to protect the everyday beauty of places for everyone to enjoy, forever. We have such a place down Saddleworth Road and Brian Royd Lane. Not everyone can join the National Trust nor wish to get in their car and drive miles to walk in the open countryside. We have such a place on our doorstep. Where people can take fresh air with family and friends. Encourage children to be out in the open, exercising instead of inside and contributing to the obesity problem. Calderdale Council have the same opportunity, to stop our greenbelt fields being bulldozed, concrete foundations laid and six hundred houses built! Surely keeping our greenbelt is in line with the council's 'Wellbeing Strategy'. If the council are concerned about people enjoying good mental health, as Mr Butcher Calderdale's Director of Public Health says, I quote: ' A healthy and happy workplace is more than just an ideal ; it brings with it economic gains for businesses large and small too.' That's the message from Calderdale's Director of Public Health, Paul Butcher in his department's latest annual report. At a special presentation in which the importance of good mental health is discussed..... Good mental health is not just for the workplace but it is also very important in our homes and gardens and the area in which we live. Another 600 houses down Saddleworth Road will not help the mental wellbeing of the present residents but will exacberate the problem! Mr Butcher also says 'If the local economy is to grow and flourish improvements to health and wellbeing must be prioritised! How true! Will Calderdale Councillors please consider their 'Wellbeing Strategy' for the people of Greetland. Because the proposed development of 600 houses along Saddleworth Road is not going to help our wellbeing. If it gets approved the development could take four or five years. There will be noise from the diggers as they excavate the beautiful green fields. Noise from the bulldozers, the wagons as they come and go from the site. The workforce - usually have radio's blaring music out. The dust, mud on the roads, more temporary traffic lights. The upheaval to all the wildlife that exists in the area. The loss of the wildlife habitats. We have the usual birds plus herons,grouse, owls, foxes and bats.. How does this help our mental wellbeing? We will need to join a business that is 'celebrating mental wellbeing' and trying to encourage more of it'. I worked for Calderdale Council for thirty years as a teacher. I would now like to retain my mental health wellbeing, by enjoying our greenbelt in Greetland and all that it offers. To continue to enjoy walking in our green countryside without hearing diggers, wagons, drilling, banging sawing, radios, seeing house after house being constructed to the number of 600. I would like to continue to hear the bird song. We heard an owl again last week! If the Leader of Calderdale Council, Councillor Tim Swift is 'committed to protecting Calderdale's green belt and wider countryside' will he please demonstrate it by taking off the greenbelt areas from the Local Plan. Let's build on brown field sites. Actions speak louder than words! We are trying to reduce our local carbon emissions. Councillor Tim Swift says I quote 'The Local Plan gives us the opportunity to manage this development to reduce the environmental impact and to protect the green spaces which are so vital for our communities and for future generations'. How true these words are! The Climate Change Working Party would like to update the Climate Change chapter of the Local Plan to include a commitment within Calderdale to reduce greenhouse gasses by 60% to 2032. How can this happen when there is a proposed development of 600 houses on Saddleworth Road? Is Greetland School going to be surrounded by 600 houses, which could equate to 1,200 extra cars going onto Saddleworth Road to access West Vale. All the fumes that this will add to the area. How healthy will that be for those parents who have chosen to walk their children to school? Rather than take the car and add to the already

congested road! How healthy will it be for the many dog walkers, all the existing residents who already know the health benefits of walking and exercise in the fresh air is paramount to a healthy mental wellbeing and how important it is for fitness. Greetland residents don't need to be encouraged to go out and 'move more'. 'Calderdale gets Â£2.65m boost to encourage more people to be active. Councillor Faisal Shoukat says: .... It's just about encouraging people to move more, more often, whether that's walking the dog, taking the kids to school.....' We already do it and that is why we care so much about our greenbelt we don't want it decimating! Although there again if our greenbelt does go we might need to get in our car and access other open spaces for our daily walk! Adding to the congestion and pollution of our local area! Councillor Faisal Shoukat says 'the Pathfinder grant cash will be used to test ways in which physical activity can be embedded across the borough.....using the borough's parks and open spaces.....' How ironic! We already have the green open spaces on our doorstep which we and visitors currently enjoy. Are we not doing enough destruction to our countryside? Please, Stop and Think! Because once those green fields have gone, they have gone!! There is no going back. Do we really want to destroy the beauty of the green fields, the wild life that inhabits the area. To discourage the walkers who are gaining fresh air, exercise and alleviating any mental health issues? Do we really want to spoil our countryside for the next generation? The children who are at Greetland school. The children who are not yet born and who will attend the school. Josh Fenton-Glynn in his 2019 manifesto prior to the General Election said 'he wanted to preserve the green belt for his 18 month old daughter to enjoy'. Well please Councillors Tim Swift, Faisal Shoukat and Josh Fenton-Glynn, 'actions speak louder than words'. We don't want empty promises. At the moment Councillors and Health Chief's are all very good at saying the right thing but please put it into action and let's stop the decimation of our greenbelt sites in Greetland and also the wider community of Calderdale. I am sure if we look hard enough we can find brownfield sites which are ripe for development, like the desolate site up Blackley which has now been developed and enhanced the area. But please let us not use greenbelt land. We are told the 'Environment Agency have not listened to the concerns raised by the people living in Mytholmroyd. Well will Calderdale Councillors please listen to the people of Calderdale. We do not want houses built on greenbelt land. Our fields in Greetland are flooded, you will have seen photographic evidence. The Black Brook is a torrent of water. Water runs down hill, it has to go somewhere, where will the water soak away if houses are built on these fields? The water will continue flowing into West Vale and onto Elland and create even more floods. Are Calderdale Council going to pay the insurance for all these flooded properties? Josh Fenton-Glynn says 'It's key to help those worst affected by these floods both financially and mentally, which is why we also have Healthy Minds on standby to help the public.' Well I and many others think that Calderdale Councillors can help the mental wellbeing of the people living in Greetland by saying NO to building on our GREENBELT LAND. We don't want empty promises and words, we would like our Councillors to say NO development on Greetland's greenbelt. Please lets' save it for the next generation. When formulating the first Local Plan I was informed that compromises had to be made. Consequently permission was given to develop greenbelt land down Brian Royd Lane so as to save developing the fields down Saddleworth Road. Please let's not lose those too. Or perhaps we could refrain from building on the greenbelt fields down Brian Royd Lane. Finally in summary my concerns and objections to building on Greetland's Greenbelt are: Traffic Congestion Air Pollution Noise Pollution Light Pollution Flooding Mental Health Issues Loss of Wildlife and their Habitats Thank you for reading my objection. Brenda Smith

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2109** Site ref (if applicable):

Person ID: **1246858** Name: **Edwina O'Sullivan** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

THIS COMMENT WAS RECEIVED AFTER THE CLOSURE OF THE REPRESENTATION PERIOD. There would be a terrible impact on the roads through Greetland into West Vale which are already very busy and gridlocked at peak times not to mention the danger to school children. It would also cause a big impact on Schools, Doctors and Dentists in this area. All these sites are prone to bad flooding and are not suitable to build houses on.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2124** Site ref (if applicable):

Person ID: **955848** Name: **Mr Chris Illingworth** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Compliance / Lack of Transparency Calderdale council have failed to make Greetland residents aware of these plans, timescales, and the need to submit objections following recent changes and re introduction of land. The whole process lacks transparency and seems underhand. The fact the section along one stretch of road has been split into 4 areas, the complexity of the submission page and where to find the plots given they have classed under a different village name (Elland) which Greetland has never been linked to. Also from the start there was a lot of talk that this is a done deal from people who knew people who worked at the council and local farmers who's land will be sold. When objections have been submitted they have been changed or vastly delays going on the system so no one can read them. My 72 year old mother in law cried the other day after trying to object at how complex the whole system is and how her and her friend

at the church and other high numbers of elderly on the area felt they were letting the community down with how complex and unsupported the process is. Also I am sending this by email as the number of times I have tried to do on the system for it to shut down with a number of error messages (one being -"the event is not currently available for consultation!??) I will try and add to each site in the official way but giving the pending deadline if I cant get it to work I wanted to send something across.

Do you consider the plan to be Sound?:

Sound Reason:

Infrastructure Traffic - There's a significant issue with congestion along Saddleworth Road as it stands, particularly around West Vale junction where it often takes over 20 minutes just to get through 1 set of lights. Building any additional homes that will use this junction will just compound this existing issue. But building up to 600 homes along one road without significant infrastructure improvements will be detrimental to the area. It was also increase the number of cars heading up to and from the M62 motorway, already an extremely busy route with long wait times at peak times, putting people off moving to the area. The road is also used for many heavy vehicles such as large lorries and tractors (I would say 1 in 7 vehicles is a HGV) this is only going to get worse with planning permission for a HGV turning circle being agreed to send large vehicles away from Sowerby bridge and down Saddleworth road into Greetland. In an area which is high for families, has a school on the main road and is already heavy congested how can the council think adding any more traffic (never mind 600 houses worth) on one road is a logical decision School ; Greetland (Sunnybank) is at full occupancy with some years over subscribed. Expansion of the school would be needed to support any additional homes or will existing and new residents be expected to move out of the area? There are no available plans on how this issue will be mitigated. It is also on the main road which given the traffic issues raised above gives major concern for air pollution for our children ; how will this be mitigated? Doctors ; Again, an element of our infrastructure that is already at breaking point, with significant wait times for appointments. Additional homes will further strain this and increase the traffic around the west vale junctions. Safety The amount of traffic moving along Saddleworth Road at peak times currently presents a significant risk. This is particularly apparent at school pick up and drop off times. Just before Christmas my father had an accident whilst dropping both our Children off for school. The sheer amount of traffic and the narrowing of lanes (due to parked cars and HGV's) results in someone reversing into his car and causing a serious head injury. Luckily the children weren't in the car at the time. More housing will cause more injuries and safety concerns. Land allocation It's difficult to understand from the information provided why Greetland has been categorised in with other local areas , I.e Elland and Stainland, which when added together presents a misleading position of the area and the impact of so many additional homes. In addition, the only reason established (or communicated) for not focusing developments across a broader area of Brownfield sites is due to the additional costs to developers. This, in anyone's eyes, cannot be deemed 'exceptional circumstances' and the council clearly had not explored all other available options for development. Given the scale of the Calderdale area putting the majority of their housing plan across 2 close villages on green belt land says more about the politics between the different councillors representing different parties than it does about their planning capability Wildlife We used to live in Leeds but moved to Greetland so our children could grow up in the countryside alongside wildlife. We often go for family walks along the wildlife corridor and see a vast number of animals such as deer, hedgehogs, beavers, owls, Herron and I have been told of a number of bats in the area. I just cant get my head around what exceptional circumstances with a vast number of derelict brown field sites unsupported would allow the vast development proposed along this precious wildlife corridor on green belt land ; not withstanding the years of disruption and noise the building at this scale would pose to the wildlife and the children at the local school. I would seriously question the mitigating risk of this in the plans and the extent to which the real level of wildlife in the area has been captured Flooding Development along Saddleworth Road will result in surface run off, impacting the entire area. Greetland already suffers from flooding across this proposed site. These fields act as a natural flood defence and

housing development will surely increase the problem and create more flooding in the West Vale area. It is not small scale as recently demonstrated when the water ran down and flooded a number of properties and commercial outlets in west vale. The water was so strong a shipping container was removed from a west vale rugby club causing damage to a bridge in Ellend. With the current government commitments and the complex nature of the springs leading down the fields in Greetland how can turning these vast fields into concrete support and prevent the flooding which is regularly seen. The small area of land marked as flood plane already regularly goes into residents gardens, many roads all the way along from saddlewprth road are often more like streams with Gate house land and other areas being prone to flooding. The NPPF states no development is to be permitted on land that is liable to flood. With millions of tax payers money being spent on flood defences in the area which still don't prevent flooding how can any of this land be classed as not liable to flood (lots of photographic evidence over the years and this year of this across all 4 proposed sites) How can the prime minister commit to stop building in areas of high probability of flooding when the majority of Calderdale housing plan is in an area which regularly floods? The mitigation comments on the plans show a real lack of understanding and wider impact of the area Summary Building up to 600 new homes in one village, along one road, increasing the village capacity of urban sprawl (1041 additional units overall in a village less than 3000 dwellings!) with no clear plan to mitigate the above issues defies any logic or common sense. The lack of thought, consideration and transparency of process provides no confidence the plans will implemented with any degree of success. Therefore, as a family we strongly oppose any plans to build on all sites given the lack of infrastructure and impact on pollution and wildlife in the area, the disregard for history and heritage and the disriportunate impact of the houses being build on one main road in one village. I would also be very keen to understand the exceptional circumstances to justify building on greenbelt to this extent in one village with a number of brown belt sites left in derelict in this and other wards? There are currently 135 properties for sale on right move in HX4 alone with a number of friends having to rent their houses as unable to sell Despite the lack of infrastruce, impact on wellbeing and quality of life of children, safety of the road and air pollution I cant see how this plan is sound or legal and it does not conform to central govement policy or current legislation with regards to building on flood risk areas. It also does not conform to any commitments the govement has made on tackling air pollution and flooding in the area

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2126** Site ref (if applicable):

Person ID: **1246861** Name: **Ms Jemma Guy** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

I am writing to express my opposition to the above sites as listed on the Calderdale Council planning portal.

I have attempted to register my opposition on the planning portal and have not received my 'activation code' which means I am unable to comment on the portal. Calderdale Council have not made all residents in the area aware of the need to submit new objections to the updated plan and that these must be submitted in good time. They have a responsibility to the residents and public in general to be open and transparent and this has not been the case, nor is the process to object easy or straight forward.

Do you consider the plan to be Sound?:

Sound Reason:

1) Disproportionate amount of building in the Greetland area . The revisions to the plan (i.e. the addition of the new sites) proves further unsustainable development with a disproportionate amount of new homes proposed across four sites in Greetland with 1,041 additional units of the 1,708 on new housing sites (over 60%) proposed in the Elland area. The way in which Greetland has been bundled in with other wards creates a misleading representation of the area. It is a village, not a town, why has it been included in Elland and why have other areas eg Stainland had zero land allocated? Ripponden and Rishworth are not included within Sowerby bridge or combined with a town, and therefore are represented in a fair way, which Greetland is not. Why is Greetland set out in such a way to disguise the how disproportionately the land in the local plan has been allocated? 2) Flood areas This affects the whole area. The proposed developments are situated within the flood plain of the Black Brook and are also subject to surface water flooding from the run off from the steep hillside of the valley. This has been demonstrated very clearly at the beginning of February 2020 following Storm Ciara & storm Dennis. The Environment Secretary has stated that extreme rainfall events such as this will becomemore frequent as a consequence of climate change. Therefore flood plains will become ever more important to -“slow the flow"and reduce the peak river levels further downstream. To build houses here is in appropriate both at a very local level and further afield. Development here on site LP 0177 will result in additional surface run off, which contributes to additional flooding. The fields currently act as a natural flood defense. If new development is related to causing flooding to existing properties, like the houses on Woodfield Drive, the development does not comply with NPPF policy. We need to question the Council's Sustainability Appraisal process to support the release of the new sites with the site at 'Land adjacent Ellistones Place' (Ref: LP0177). This appears to be a completely unjustified recommendation. The site report states that the assessment of SA7 is 'Negative' and marked 'RED' commenting that ''Overall the impact is negative as the site is greenfield and lies within flood zones 2 and 3''. Based on this information this site should be excluded, and Calderdale has declared a climate emergency. 3) Sustainable development & Infrastructure: The function of the planning system/process is to facilitate sustainable development that makes a positive contribution to the environment. It is not the role of the Council to release demonstrably unacceptable sites within the Green Belt to meet a housing target. The existing infrastructure is not adequate to support the development on this site or at others identified within the local plan. The road network is already operating at capacity and frequently backs up at Saddleworth Road and Stainland Road at peak times, additional traffic from the development will only exacerbate this problem further. The queuing traffic will lead to increased levels of pollution, which is of particular concern at the Greetland school site which is situated at a lower level than the road. There currently is no space at doctor and dental surgeries in the area. Similarly the additional housing proposed will be designed with families in mind, and there is insufficient capacity at local schools. There are extremely limited public transport services in the area. 4) Greenbelt land The greenbelt is highly sensitive, due to the wildlife corridor and the way in which it acts as a natural flood defense. The public right of way runs through this stretch of greenbelt and provides the local community free access for leisure and recreation. Why has this been left in the plan when Stainland, on high ground which does not have flooding issues has been saved from the local plan? The development here in Greetland will have much greater harm due to the flooding. A labyrinth of underground springs already cause small scale developments problems. The Greenbelt is protected land which is designed to prevent urban sprawl and towns merging into one entity. Greetland and Barkisland are villages if building on the Greenbelt takes

place, then there will be no distinction between them. There is no valid reason to destroy this Greenbelt land when there are brownfield sites available in the area for development. There are many mature trees on the site that need to be protected, as well as the visual amenity, these trees reduce pollution, stabilise the land reducing erosion caused by surface water at times of heavy rain. This area of greenbelt is home to numerous species of wildlife - deer, dippers, bats and countless species of insects. The wildlife & Countryside Act (as amended)1981, The Conservation (Natural Habitats &c) Regulations 1994 and the Countryside & Rights of Way (CRoW) Act 2000 are all being contravened by including this site back into the Local Plan for development. Although the Calderdale Council's Senior Planning Officer recently stated at a Local Plan Meeting that they had saved much Greenbelt, the fact is they have proposed to build on even more Green Belt in Greetland that on the previous agreed Local Plan. Indeed the inclusion of sites in Greetland including site LP0026 is the majority of Greetland's existing Green Belt. Esther McVey, the current Housing Minister's written policy on Green Belt land states -“protecting the Green Belt goes beyond protection against development"and -“Greenfield sites should not be what we turn to, not what we look at first. Every blade of grass must be looked at before it is changed."In conclusion, all other issues which have been flagged and some highlighted by the council itself STILL remain.... Traffic impacts Air pollution Infrastructure Flooding They all just add to the fact that the proposed plan is not sustainable in NPPF terms. When the harm identified is taken into account then the proposed plans do not amount to sustainable terms.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2130** Site ref (if applicable):

Person ID: **1128929** Name: **Mr Andrew Day** 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:

Here are my comments relating to sites LP0026, LP0177, LP0952. I have made comments on a previous version of the Local Plan relating to road traffic and pollution in the Greetland West Vale area, the availability of essential services such as schools and healthcare, damage to wildlife and habitat, and the loss of amenity from the use of beautiful green belt countryside. My concerns in these areas are major and still stand. All 3 proposed sites in Greetland (LP0026, LP0177, LP0952) present substantial risk of worsening flood and storm water drainage in the area. LP0026 has "Potential for increased surface water flooding", LP0177 is a Flood Zone, is alongside Black Beck and contains Sunny Bank Clough and Daleside

Clough watercourses, LP0952 contains Crawstone Clough water course and is at "risk of surface water flooding". In view of the known vulnerability of the Greetland area to flooding and surface water flow down built-up hillsides, it seems to be a disastrous idea to build houses and road on land which helps to get stormwater away and provide somewhere for it to go. Site LP0177 seems to be critically important as a flood plain: the recent impact of Storm Dennis caused Stainland Road and adjacent businesses and fields to flood which would surely be worsened if Black Beck and the land above it were no longer allowed to absorb and 'slow the flow'.

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 **HRU2134** Site ref (if applicable):

Person ID: **1246864** Name: **Mr Andy Lomas** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2138** Site ref (if applicable):

Person ID: **1246865** Name: **Mr Daniel Jevons** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

I am writing to you in reference to site numbers LP0026, LP0177, LP0952, and LP1625. I believe that these proposed developments are unsuitable due to the impact on the local infrastructure, which has not been sufficiently considered within the local plan. The development would have a significant impact on traffic, increasing journey times to the town centre and adding to already large queues of traffic in the local area at rush hour. There would also be an increase in air pollution as a result of the increase in road users, whilst at the same time depriving the local population of open green spaces. Local services would also be impacted by the development such as schools, dental practices, and medical centres. The existing services would be unable to cope with such a large influx of people. Finally, the recent weather events that have taken place so far this year and the flooding that has occurred within the proposed development areas in Greetland as a result is a concern. Given that this land essentially acts as a flood plain currently, any proposed development is at risk of flooding, or diverting flood water and impacting other residents.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2145** Site ref (if applicable):

Person ID: **1243036** Name: **Dr Fiona Ellam** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

There is no evidence on any published documents made available to the local residents indicating the impact that this development will have on the surrounding area in terms of: air pollution, traffic increase, impact on local amenities, the environmental impact in terms of water course and potential flooding as the land is no longer able to soak up water. The area is designated as Elland (not our postcode) not as Greetland and West Vale, the amenities in Elland are not relevant to this area, they are different. There is no traffic management plan in evidence for this area, to accommodate the increase volume of traffic, it is an already congested area. There has been a lack of transparency by the council with the additional of this

site to an amended version of the Local Plan . There is a lack of transparency and honesty in labelling adjacent sites as individual entities. They all would increase the amount of urban sprawl and have a cumulative impact. There has been a lack of communication with the community by the council which is against Calderdale's statement of community involvement (2015) The development of a greenbelt area is only to be undertaken in exceptional circumstances as the current housing minister indicated. There has been no explanation as to why this is exceptional circumstances to develop this area. There is no detailed information on the environmental impact of using this greenbelt land, in terms of the mental wellbeing on the community who are currently able to access Black Brook for walking etc.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

There needs to be more detailed impact studies completed, for example: What are the current levels of air quality and how would these be changed by the increasing volume of traffic, what impact would building on this site have on water levels of the brook? This data needs to be shared with the local community in a transparent way.

Comments:

Additional Evidence Link:

Comment ID **HRU2148** Site ref (if applicable):

Person ID: **1246866** Name: **Ms Karen Lomas** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

The Calderdale Statement of Community Involvement 2015 calls for clear communication and clarity. The consultation process has not been clear. Labelling sites along Saddleworth Road, with an HX4 postcode, as 'Elland' which has a different postcode and is a town in its own rights with separate amenities, is misleading. This is a crucial factor in my decision to consider the Plan NOT legally compliant. There has been a lack of community consultation regarding the inclusion of site LP0026, re-entering site LP0029 back into the Local Plan without scrutiny from ward councillors demonstrated a lack of honesty and transparency. Pre consultation engagement regarding site LP0026 has not taken place. The NPPF, para 155 to 165, states that building in flood risk areas should only be in exceptional circumstances and IT SHOULD NOT be to the detriment of other communities. There is not sound research to show that areas below the development would not suffer from flooding as a result of its introduction. This is not legally compliant.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Calderdale economic forecast is not reliable. Calderdale Clean Air Policy ; states there is a climate emergency - and NPPF para 181 - building and traffic congestion would cause further pollution and will

contribute to the climate emergency.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

NPPF para 133 advises against urban sprawl which will happen with this development NPPF para 102 ; chronic congestion ; this will happen in West Vale NPPF para 138 ; why take from one area and recreate in another

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2150** Site ref (if applicable):

Person ID: **1246867** Name: **Ms Louisa Fisher** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

I feel Calderdale Council has failed in its duty to inform residents of these plans and therefore given them little time to object.

Do you consider the plan to be Sound?:

Sound Reason:

Greenbelt NPPF paragraph 143 states: -“inappropriate development is harmful to Greenbelt and should not be approved except in very special circumstances"I have seen no evidence from Calderdale Council to justify -“special circumstances"This area is a significant area for wildlife ; bats, owls, badgers, foxes, herons, etc. If we lose this area of Greenbelt land we lose the wildlife forever. Open green spaces are important for the physical and mental well being for all. Flooding As a resident of Saddleworth Road, I am well aware of the flooding which occurred in December 2015 and again in February 2020 and the devastation it caused local residents and businesses in the area. There are numerous natural springs in the hillside from Stainland, Barkisland and Greetland which run through this land.Should the land be developed where will this water go? It will move further down the valley causing flooding to other areas. The land is a natural flood plain and as such it should be left to do its job. Congestion The junction of Saddleworth Road/Stainland Road and Rochdale Road/Stainland Road is already significantly congested.Increasing housing will just exacerbate the ongoing problems with traffic congestion and pollution. Infrastructure Local schools are already full to capacity.The local GP surgery would not cope with the extra patients. Urban Sprawl There is a risk that urban sprawl will further encroach into the surrounding countryside. This land in Greetland falls within the wider area of Elland and there is a disproportionate allocation to Greetland than other parts of the Elland region.Stainland having no housing allocation at all.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2155** Site ref (if applicable):

Person ID: **1243962** Name: **Mrs Anne Crawford** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

Air Quality- This is of great concern as we live adjacent to Saddleworth Road. We already think that the air quality is poor you can smell the fumes when we sit in our garden from all the lorries and cars that use this road. When we walk to the park in West Vale with our young grandson the fumes can be terrible and this isn't at peak times. When the motorway is closed the traffic backs up as far as Ellistones Place , this will only get worse. Recent articles by experts at children's hospitals have concluded that infants exposed to traffic flow have less grey matter in their brains and are more likely to develop asthma. More houses, means more cars which means more pollution especially to vulnerable children at schools on roadside sites in Greetland and West Vale. Building the quantity of homes proposed for Greetland will massively increase traffic, this isn't just the homeowners cars but delivery vehicles. It is the local government's duty to protect young and old alike from anything that may deliberately damage their health. The government is committed to reducing road pollution so this massive development should not go ahead. Noise Pollution- We already experience levels of noise pollution from the many lorries that speed down Saddleworth Road. We have speeding cars and taxis during the early hours of the morning especially Friday and Saturday nights and we are usually woken at 6am in the morning by traffic. If all these houses are built the traffic noise will be unbearable. This does not help our well being but causes depression. Loss ofWildlife- We are really concerned about the huge impact of this mass housing will have on local wildlife. The plan to build on so many fields at once is irresponsible, wildlife doesn't stand a chance.The local plan will destroy so many habitats this also has an impact on human welfare and the benefits of nature. Behind our house there used to be a small wilderness (it was green belt), the area was full of wildlife - bats, squirrels, foxes, mice, moles and many species of birds. Their whole habitat was destroyed for the sake of two big houses now concreted over. The impact on wildlife coming to our garden has been huge we hardly see anything now. Flooding - It hasn't stopped raining since September (climate change). Greetland is situated on a hillside and is full of springs. When it rains water is coming out of the ground everywhere, down ginnels, pouring out of people's driveways, coming through walls etc. In December 2015 Greetland was awash with water in particular the fields in LP0177 and again a couple of weeks ago when the proposed building site was a lake. In both these incidences West Vale was flooded damaging property. If this building work is allowed to take place then instead of the fields soaking up the water, the water will rush down the hills into West Vale flooding West Vale but it won't stop there this will lead to increased flooding in Elland and

Brighouse. In light of the desperate situation in Hebden Bridge and Mythomroyd and the plea by flooded households and businesses to try to prevent this from reoccurring it seems irresponsible to create that situation deliberately in this area. It was reported on the news this week that West Yorkshire has had the highest rainfall this winter than anywhere else in the U.K. Overdevelopment in one area - Greetland is being overdeveloped in comparison to other areas. We are expected to accept development on a life changing scale for people living in this area when other areas of Calderdale aren't seeing any development at all. The sites should be spread across Calderdale. In the past Greetland has seen many developments especially on Saddleworth Road. We don't have enough school places now nether mind when all these family homes are built, doctors and dentists are full. West Vale is a nightmare now, we have lived here 19 years and I don't remember having 1 year when Stainland Road didn't have roadworks. Loss of Greenbelt- what's the point in having areas designated as Greenbelt when it seems so easy to take it out. The idea of Greenbelt is to protect the countryside not to remove it, it should remain Greenbelt forever. In January 2021 the government is introducing a points based system for immigration. The figures for the amount of houses required was based on the free movement of the European Union these figures now need to be revised so therefore there should be a reduction in the amount of houses built. Please listen to the real concerns of people who live in Greetland. At the moment it is a pleasure to see the green fields to the south of Saddleworth Road please keep it that way.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2172** Site ref (if applicable): **LP0026**

Person ID: **1246900** Name: **Mrs Lorraine McLaren** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Due to technical difficulties with your website we would like to register our objections to the proposed above devopment sites. Greetland is a beautiful semi rural village and the proposed extent of increasing the population density without any forward thinking regarding infrastructure would not be conducive to the the well-being of local families who are already experiencing fast paced change. Increased traffic would impart on the clean air and environment factors we are all aiming to improve for the future. Approval of such developments would also contradict our responsibilities to our local wildlife. Proposed development on any Green belt floodplain beggars belief especially as recent weather conditions now seem to be more of a regular occurrence. Please accept and confirm our objections to the above proposals.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2173** Site ref (if applicable): **LP0026**

Person ID: **1246901** Name: **Mr Stuart McLaren** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Due to technical difficulties with your website we would like to register our objections to the proposed above devopment sites. Greetland is a beautiful semi rural village and the proposed extent of increasing the population density without any forward thinking regarding infrastructure would not be conducive to the the well-being of local families who are already experiencing fast paced change. Increased traffic would impart on the clean air and environment factors we are all aiming to improve for the future. Approval of such developments would also contradict our responsibilities to our local wildlife. Proposed development on any Green belt floodplain beggars belief especially as recent weather conditions now seem to be more of a regular occurrence. Please accept and confirm our objections to the above proposals.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2196** Site ref (if applicable):

Person ID: **1130552** Name: **Mrs Nicola Beaumont** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Flooding You only need to look at the February 2020 floods to understand why building on this land is utrageous. Not for the first time, the river burst its banks along Saddleworth Road with flood water rising in the fields of the proposed development plots. Having previously lived on Saddleworth Road, I know for certain that this is not a one off. On many occasions, I would sit and watch as the river levels rose, and eventually fields (floodplains) becoming submerged in water. You can also look back at the floods of Boxing Day 2015. A memorable day when not only the river of Saddleworth Rd, but many parts of Calderdale (including Heath Rugby Club/Willow Valley Garden Centre), were unfortunate to be the victims of heavy rain and flooding. If these developments go ahead, where will the water go? The floodplains hold water in such a way that it creates a natural flood defence, storing water before it can take devastating effect elsewhere (people's homes and businesses). The Environmental Agency has as stated that this area of land is categorised as the most severe of all - Flood Zone 3 (land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%). Below are photos taken in the proposed Saddleworth Road sites following the February 2020 floods. Green Belt This land is classified as highly sensitive green belt on the Local Plan.It is a designated wildlife corridor and is home to a number of protected species such as bats, hedgehogs, barn owls, wood peckers, herons and birds of prey. A largescale housing development would result in non-physical disturbances to the wildlife and protected species in our area. Such disturbances are noise, vibration, visual presence, human presence, light pollution and air pollution. Government policy states that all brownfield sites must be used first. Brown field sites have not been exhausted. Air Pollution Developing 600 new houses along Saddleworth Road, we can estimate that this will bring approximately 2 vehicles per household, which equates to 1200 extra vehicles on the road in the local area. West Vale cannot cope with the vast amount of traffic congestion as it currently stands; increasing this will only have significantly negative effects on traffic levels and the levels of air pollution. Air pollution consequently affecting the health and wellbeing of people especially those in close proximity of the area. For example, the children at The Greetland Academy and Greetland Pre-School. Being located at the side of Saddleworth Road will not only make this a physically unsafe place to be, but the health of these children will be impacted by the inhalation of added traffic fumes. The World Health Organisation stated that one reasonwhy childrenare particularly vulnerable to the effects ofair pollutionis that they breathemorerapidly than adults and so absorbmore pollutants. They also live closer to the ground, where somepollutantsreach peak concentrations ; at a time when their brains and bodies are still developing. The Clean Air Strategy 2018 stated that -“While we do need to ensure economic growth, we also need to realise the 'cost of air pollution on health."https://consult.defra.gov.uk/environmental-quality/clean-air-strategy-consultation/user_uploads/clean-air-strategy-2018-consultation.pdf Community The proposed sites for development are used daily for walking and other forms of recreational activity such as biking and running. This green belt land is open space and a wildlife corridor, homing owls, bats, herons, hedgehogs but to name a few. The land is a quiet place, perfect for mental and physical health and wellbeing. Building on this land will be detrimental to the health and wellbeing of our people. Infrastructure The Greetland Academy already consists of 2 classes per year group, with approximately 30 children in each class. This school is already split over 2 sites, both full to capacity, so how can it possibly cope with accommodating more children? Developing on this land will provide no option to extend the Key Stage 1 Site, and the location of Key Stage 2 makes it impossible to accommodate increased intake of children. The Doctors Surgery would struggle to manage waiting times and appointments with an increase in patients and the local Dentist already have a waiting list for new patients. Junctions at West Vale unable to accommodate

additional volume of traffic, as it is already dysfunctional. West Vale is a thoroughfare for a number of locations including but not limited to: Halifax, Huddersfield and the M62. Commuters from various surrounding areas such as Ripponden, Barkisland, Elland and Stainland rely on the West Vale junctions to make journeys to these destinations. The increase in traffic congestion is too much for West Vale and surrounding roads to cope. Also, worth noting is, Rochdale Road which runs parallel to Saddleworth Road is also impacted by traffic congestion from Saddleworth Road, and again is not capable of supporting the increased number of vehicles on the road as a result of the housing developments.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5634810 ; http://calderdale-consult.objective.co.uk/file/5634811 ; http://calderdale-consult.objective.co.uk/file/5634812

Comment ID **HRU2209** Site ref (if applicable):

Person ID: **1246925** Name: **Mr George Hill** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

Green Belt Our Green Belt in Greetland is at the heart of the community and there is not much of it left. If these spaces are taken then they are gone forever. The government attaches great importance to Green Belts and stipulates theGreen Belt should only be built on in exceptional circumstances. (Refer to Section 13 of the NPPF .) We have sufficient brownfield sites within Greetland providing they are used to accommodate the needs of our local community and to support our local economy and would ask that all 4 of the sites on the Green Belt be removed. How will the council replace our green spaces? I also object to the planning application 18/01189/FUL as this particular site would meet the needs of our local people subject to revised plans. Flooding Flooding is a major problem all along the Green Belt along side Black Brook. The fields were extensively flooded during the storms 8th/9th February 2020 yet again with flood water spilling over into the gardens and almost into the houses of Woodfield Drive. The water was too deep to even walk in and the river bank was totally cut off. The water was rushing into these fields at a terrible and frightening pace and you could not even see the boundary walls. To think that houses could be build on this land is completely outrageous (LP0177). Do we not have enough flooding, Calderdale have declared a climate emergency? Flooding is extreme and frequent. Wildlife Any development would decimate this Wildlife corridor. There is an abundance of wildlife, herons, owls, many different species of birds, pheasants, bats, frogs, ducks and many more. This is a very valuable part of our environment. There

would be an increase in the air pollution, noise, vibration and of course human presence. This Green Belt with all the nature and wildlife should be protected. We need these green spaces for our health they are well used. The wildlife corridor could not survive a major development and is also a flood plain. Traffic and Air Pollution Should more houses be built there would be an increase of at least 1200 more cars as nearly every household has at least 2 cars if not 3 or 4. With the amount of traffic on this road I no longer feel safe walking to West Vale. Traffic is regularly at a standstill on Saddleworth road as the road cannot cope with the amount of traffic that use it. West Vale is consistently congested. We need the air quality in our area testing. We cannot support a huge rise in concentrated air pollution. We have to think of the health of the children and the wider community. Infrastructure Without major adjustments these plans would result in urban sprawl and would have a drastic impact on traffic, schools, GP and Dental Practices. Is it not the governments priority to improve air quality and retain open green spaces. This being essential for our health and wellbeing? If the houses are built on the brownfield sites then I do not object and accept that there may be a need for more housing. It has to be the right housing in the right places.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2245** Site ref (if applicable):

Person ID: **844301** Name: **Cllr Marilyn Greenwood** Organisation: **Calderdale Borough Council**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

SEE ATTACHED FOR FULL REPRESENTATION

Do you consider the plan to be Sound?: **No**

Sound Reason:

SEE ATTACHED FOR FULL REPRESENTATION

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

SEE ATTACHED FOR FULL REPRESENTATION

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5635292 ; http://calderdale-consult.objective.co.uk/file/5635291

Comment ID **HRU2268** Site ref (if applicable): **LP0026**

Person ID: **1246939** Name: **Joseph Matthews** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

I would like to strongly object to the following sites. Reference ; LP0952 LP0026 LP1625 LP0177 I strongly object to proposed change to the housing requirement made by Calderdale Council due to the sheer lack of existing infrastructure we have to support the additional growth in houses, and in the absence of an adequate and sound infrastructure plan. I have reiterated my comments in previous consultations about the community's concern about our already overstretched infrastructure. It is not just GP surgeries, schools and other frontline services, but the capacity of our highways, train services, our drainage and sewerage systems, and our few remaining floodplains/Greenfields (including Green Belt) in our area. I carry serious concerns due to the sheer volume of proposed new houses, coupled with an inadequate infrastructure plan with no evidence of funding or deliverability, and no guarantee that those moving into these new houses will be those who work in the area. This will result in more traffic on already heavily congested roads, just try driving through West Vale at rush hour, deteriorate air quality , pollution and associated health and wellbeing of residents, see the loss of the majority of our Green Belt, will increase the flood risk , and push our already overburdened public and frontline services past breaking point. Furthermore, the Local Plan goes against the 'Climate Change Emergency' declared by Calderdale Council on 30.01.2019 with regards to air quality, transport and flooding. The recent events of Storm Ciara and Storm Dennis shortly following, illustrated the Calder Valley's vulnerability when it comes to flooding. I have spoken with many local residents from the Greetland area whilst on the campaign trail who have informed me that each and every one of the sites proposed within the local plan had flooded during the recent storms. Disproportionate and overdevelopment of our area, as is recommended in the Local Plan, would decimate our area, leave very little Green Belt/open spaces for residents and wildlife to enjoy, rapidly deteriorate our air quality (increasing mortality rates and risk) and exacerbate flooding in our area.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2278** Site ref (if applicable): **LP0026**

Person ID: **1246958** Name: **Mr Ian Barker** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

THIS COMMENT WAS RECEIVED AFTER THE CLOSURE OF THE REPRESENTATION PERIOD. I would hereby like to register my formal OBJECTION to the planned building on the land adjacent to Saddleworth road Greetland, Application numbers: LP0177 ; LP0026 ; LP0952 ; LP1625 Reasons According to legislation when planning and developing an area, buildings should first and foremost be built on 'Brown Field' sites, and not Green Belt land. I am aware that there are still a number of Brown Field sites that have not been developed in the area. All four sites listed above are currently Green Belt Land. Three of the sites listed currently also form part of the flood plane around the Black Brook river which does actually flood every year now. This Green Belt area forms part of a Wild life corridor where the following can be seen: Herons, King Fishers, Owls and most importantly Bats as well as squirrels and lots of other bird life. Also I have seen first hand what can happen when a building development takes place along side what is a clean river. Building waste pollutants and other rubbish ended up in the river, and actually killed a lot of the fish. This area is also used on a daily basis by people who like to take in nature and enjoy the sound of the river and the bird song etc. One other area of concern is the fact that if panning permission goes ahead for up to 600 houses then on average most households now own 2 cars. This would mean up to 1200 more vehicles could be using Sadleworth road on a daily basis. With most of them having to pass the Junior and infant school which is situated to the south side of the road and has actually been built below the level of the road. This means that when the extra vehicles are cueing for the traffic lights as they pass the school the Children are going to be more vulnerable to the dangerous pollution from vehicle exhausts which does actually stay down closer to the ground at low level. The traffic flow through both sets of traffic lights in west vale is already running at around 100% capacity during the morning and evening commute. With an estimated 1200 more vehicles using this route there is no way that these traffic lights will be able to manage without there being huge tailbacks and grid lock. Finally: I would once again like register my 'Objection' to the above mentioned planning permission being granted.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2295** Site ref (if applicable):

Person ID: **1140095** Name: **Malcolm James** Organisation: **Greetland & Stainland Liberal Democrats**

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

See attached

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5635657 ; http://calderdale-consult.objective.co.uk/file/5635658 ; http://calderdale-consult.objective.co.uk/file/5635659 ; http://calderdale-consult.objective.co.uk/file/5635660 ; http://calderdale-consult.o

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Comment ID **HRU2310** Site ref (if applicable):

Person ID: **1241485** Name: **Mr Wilson Simms** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

See attached

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5635675 ; http://calderdale-consult.objective.co.uk/file/5635673

Comment ID **HRU2332** Site ref (if applicable):

Person ID: **1247032** Name: **Mr/Mrs Unknown Unknown** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

See attached

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5636973

Comment ID **HRU2338** Site ref (if applicable):

Person ID: **1247036** 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/5636978

Comment ID **HRU26** Site ref (if applicable): **LP0026**

Person ID: **1239034** Name: **Mr Stephen Walker** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: http://calderdale-consult.objective.co.uk/file/5582309

Comment ID **HRU287** Site ref (if applicable): **LP0026**

Person ID: **1242021** Name: **Mr Damien Margetson** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

I am not a planning expert and therefore not able to answer this question.

Do you consider the plan to be Sound?: **No**

Sound Reason:

I have set out my comments on the following plans LP0026 (The Gate Farm), LP0177 (Land adjacent Ellistones Place), LP0952 (Land at New Gate Farm) and LP1625 (Land to the west of Silverdale Terrace). These observations are based on my personal reflections, having lived in the community for the past 4

years, against the objectives which are set out in National Planning Policy Framework dated February 2019 (-“the Framework"). The comments I have made are relevant to all of the proposed development sites. I don't think it is possible to consider them individually as they are so interrelated, within the same area and all comments I make are relevant to each of the plans. I have attempted to review information contained on the Calderdale planning website but have found this to be confusing, contradictory and too restrictive in the way it requires my objection to be included and to be honest I am unsure of whether it is free from political bias. The Framework states there are 3 overarching objectives: Economic, Social and Environmental and at the heart of this is a presumption in favour of sustainable development. I am not against development of new homes but these have to be sited in areas which can accommodate them and where they are most needed. Taking each of the objectives in turn I have the following comments: Economic: We have currently entered into the Brexit transition period, with little certainty of exactly what this will mean for our economic prospective going forwards. My understanding is that the current plans that have been put forward are based on estimated growth rates. Given this uncertainty I don't see how the Council can continue with these plans until some of that uncertainty is removed. I would therefore suggest that plans are at least put on hold until we have completed the transition period and we have an understanding of what our new trading relationship is with Europe and how this might change the growth ambitions and assumptions. The Framework suggests that economic objectives are underpinned by -“identifying and coordinating the provision of infrastructure". I can't see how this objective is achieved with the current plans. 600 new homes requires the development and provision of significant changes to the infrastructure in the surrounding area BEFORE the homes are built. There is none in the current plans for this as far as I can determine. Local schools, doctors and dentists are currently oversubscribed and have no capacity to accommodate any more residents. Where will they go? The local bus service already does not meet the demands of the area, with the 503 services to Halifax and Huddersfield often being oversubscribed and delayed due to the existing traffic hold ups. Additionally this service running through West Vale is between 1-2 kilometres away from the majority of the proposed houses on these sites. The 343 service passing along Saddleworth Road is infrequent (only one bus per hour) with bus stops only on one side of the road - a safety risk for not only children and the elderly, but indeed for everybody, especially given the speed at which traffic enters the area and the heavy wagons using the road. The local traffic in West Vale and Greetland is already at a standstill in peak times and this is slowly getting worse at off peak times. There are currently proposed developments for improving the road network on A629 Huddersfield to Halifax corridor and on the A58 / A624 Halifax to Rochdale / M62 routes. This is great news for improving commuting along these routes, but it misses the point that Saddleworth Road is a direct connection between these schemes. Any improvement at the entry and exit to Saddleworth Road is pointless if the access between is congested and doesn't flow, as is the situation now in the bottleneck that is West Vale. The introduction of 600 houses along this route will only further add to this congestion and seriously undermine the economic benefit which is supposed to be generated from these Road Schemes and housing developments. Saddleworth Road itself is already an infrastructure disaster, especially in and around the areas of the proposed new developments. Throughout the whole 2019 there have been roadworks somewhere along this stretch of road. Invariably it is as a result of water rising to the surface, which I am told by the Individuals doing the repairs is due either to one of the numerous fresh water springs bursting through the surface material or the decay of the old pipework, which is being patched. It is not surprising the local road conditions are so poor (some of the worst I have seen in my travels across the country) given the volume of traffic which currently uses this road, especially from the HGVs which have to use the road to access the Sonoco recycling plant and the Bosch industrial units. Every journey requires me to wait for one of these HGVs to manoeuvre around the parked cars before any progress can be made. God knows what damage construction vehicles and a further 600+ cars will do to the road. The Council seemingly already doesn't have enough budget to repair the existing roads properly and sustainably - the situation is only going to get worse. I have noted that as part of this process Greetland has been classed as part of the Elland Township to justify the proportion of allocated land. I do not see how this can be so. Greetland is a separate village with its own characteristics, community, infrastructure and

councillors. I have never considered myself to be living in Elland. We are clearly separated by Long Wall. If Greetland is looked at as a separate locality, which I strongly believe it should, then the local plan allocates a disproportionately high number of new homes in this area as well as creating large scale urban sprawl which is contrary to para 80 of the Framework. Social ; health and fumes / pollution At para 170 the framework states ' Planning policies and decisions should contribute to and enhance the natural and local environment by: "¦ a) protecting and enhancing valued landscapes, sites of biodiversity or geological value' The Greenbelt areas under discussion sit within the heart of the Greetland community. Taken together, they form a large open space creating a wildlife corridor full of biodeiversity. If this proposed development were allowed to go ahead the landscape and natural habitats for these animals would be lost, causing distress and irreparable destruction. I regularly witness deer bounding through the fields under consideration. Where would these creatures go? It is not a sound argument to suggest that the wildlife corridor could be protected. Once their natural home is taken away, it is gone for good. The framework also states at para 170 e) that policies and decisions should contribute to and enhance the natural and local environment by ' preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution ' and ' Development should"¦help to to improve local environmental conditions such as air and water quality' . I do not see how the building of 600 new homes, with the associated emissions from both heating and cars can possibly do anything but have a detrimental affect on the local air pollution. Saddleworth Road, the main road through these developments, is already a primary route for a large number of lorries a day from the Bosch factory, the Sonoco recycling plant. Add to that an additional 600 homes within a small area and the community is exposed to unacceptable levels of traffic and air pollution. Environmental: The framework documents states -“ The Government attaches great importance to Green Belts "it goes on to state -“Green Belt boundaries should only be altered where exceptional circumstances are fully evidence and justified" At para 144 it further states -“ local planning authorities should ensure that substantial weight is given to any harm to the green belt"and at para 145 - “ a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt "I can't see how any of these statements can be met with the building of 600 new homes on an area of sensitive Green Belt. At para 155 the framework states: -“ Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere "The areas proposed for the new 600 homes is on Green Belt that naturally floods. In the 4 years I have been a resident of this community the area has been completed flooded twice. With the local area full of fresh water springs it is not uncommon to find the local drains and sewers unable to cope even after shortest of prolonged heavy bursts of rain, and it is only the presence of the Green Belt area which prevents homes flooding on a regular basis. The frequency of these heavy and prolonged rains is only set to increase with the global warming challenges we currently face. It therefore seems incongruous to add to this problem by building on the only area which nature has provided to counter the irreparable climate changes we are facing. In September 2019, The Housing Minister, Rt Hon Esther McVey announced that local authorities would be receiving money to crack down on illegal developments in Green Belt areas, stating that ' Once the Green Belt is built on its often gone for good, thats why we are determined to protect it. The public have told us loud and clear they want it kept for future generations to enjoy. ' I understand that Calderdale Council is set to receive Â£50,000 of this Planning Delivery Fund. How can it justifiably take this money in one hand to prevent inappropriate building on Green Belt Land, and in the other hand allow the large scale destruction of Green Belt Land in the Greetland area? This is the first time I have ever objected to a proposed development - I am doing so because I feel so strongly that we need to protect this area of natural Greenbelt. 20 years ago we were told that if we didn't make changes then climate change would ruin our planet - as human beings we largely chose to ignore those warnings. We are now starting to reap the consequences with increased temperature extremes, earthquakes, storms and flooding. My children continually tell me that our generation are ruining their future. They have a valid point. We need to stop the continual disregard for

our environment, natural habitat and wildlife and instead seek alternatives. There are numerous brownfield sites (as well as lower flood risk areas) that could be considered as development options to create new housing - some of these may be more expensive to develop, but developers profits should not be the overriding consideration in deciding where to build. Neither should political motive. On this basis, all 4 of the sites, LP0026 (The Gate Farm), LP0177 (Land adjacent Ellistones Place), LP0952 (Land at New Gate Farm) and LP1625 should be removed from the Local Plan

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Again I don't feel qualified to be able to answer this question.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU310** Site ref (if applicable): **LP0026**

Person ID: **1242293** Name: **Mr Andrew Beaumont** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Please refer to comments below

Do you consider the plan to be Sound?: **No**

Sound Reason:

For the attention of those responsible for Approving or Rejecting Local Development Proposals (Local Plan Team, Councillors, Local and National Planning Inspectors, Katie Child, Miny Schofield) Dear Sir, Letter of Objection to Proposed Housing Developments in Greetland - Site Ref LP0952. LP0177, LP1625 and LP0026 I have been a resident of Greetland all my life, some 63 years. Over that period I have witnessed the relentless creeping expansion, development and transformation of our once small desirable residential rural village into a fairly large residential conurbation of urban sprawl serving the commuter belts for the cities of Leeds and Manchester. Already gone, over my lifetime, are many of the green fields and areas where we played as children, in favour of large housing developments. However, these developments are modest in comparison with the proposed Housing Development Plan which some local and national politicians seem determined to drive through, no matter what the cost to our community, environment, air quality and wildlife. If this development comes to pass, the village of Greetland will balloon, in a very short space of time, by 30 - 40%. And, apparently, with no forward thinking about how this expansion can be serviced. The community already seems to serviced to full capacity by roads, public transport, doctors, dentists and schools. Any future demands on these services would be unsustainable. Anybody living in the area, including the surrounding areas of Elland, Stainland, Norland, Barkisland and Ripponden, understands the nightmare of rush-hours in West Vale. For years, it has been a bottleneck for residents, using both public transport and private cars, as all routes lead to the traffic-light controlled junction of Saddleworth