

CALDERDALE LOCAL PLAN

Housing Requirement Update and Potential Supply - Representations and Responses

Version 2

Document - Part 2

Calderdale Metropolitan Borough Council

June 2020



Road and Stainland Road, followed within 200 yards by the next traffic-light controlled junction of Rochdale Road and Stainland Road. At each of these locations there is the added complication of two very busy, relatively new businesses (the Co-op and Springhead Funeral Services) - how, in heavens name, was permission ever granted for their main vehicle access points to be located immediately next to the traffic lights, creating a near certain recipe for both road traffic accidents and/or holding up the traffic? And obviously, as a result of the traffic congestion on Saddleworth Road, some residents of the Sunnybank, Daleside and Trenance Gardens areas, as well as some residents of the new homes, will divert their routes to use Rochdale Road which will simply distribute the congestion to the whole of Greetland. There is currently no way of avoiding West Vale and there is no way of expanding the road network to by-pass West Vale in the future. And then there is the very serious consequence of this massive increase in traffic - air pollution. The development is within a valley which will trap traffic exhaust fumes. Within this valley are two schools, Greetland School Sunnybank Annex and West Vale, where some of the most vulnerable people in our society, young children, will be subjected to high levels of toxic air pollution every day of the week. And what will be the impact of all this air pollution on the Council's health and anti-obesity campaign? The loss of this Green Belt will remove an extremely popular route for many people taking social exercise, not only to improve their physical health but also their mental health well-being. The alternative would be to walk along Saddleworth Road, breathing in the pollution, or driving further away to rural areas for cleaner fresh air. The area along the Black Brook is also a recognised Wildlife Corridor - sightings of bats, owls, herons, kingfishers, badgers and deer are commonplace. If this development gets the green light, the destruction and eradication of the existing flourishing ecosystem is guaranteed. In this age of Climate Change and Global Warming, we are constantly being reminded of the adverse effects on our environment. And the proposed development area is no stranger to regular and serious flooding (in 2015 we experienced some of the worst flooding in living memory). The fields around the Black Brook act as a natural flood plain, without which, more serious flooding of developed areas further downstream would be a certainty. Existing drains and sewers already appear to be working to full capacity so any significant increase in foul and surface water volumes would spell certain disaster at the point of discharge. Surface water attenuation systems can be designed and included within the engineered drainage proposals, but the very old existing infrastructure at the end of the line was not future-proof designed for the volume of water that would be generated by developments of this size. And would a development of this size, combined with all the other concurrent developments throughout Calderdale, necessitate the construction of additional sewage treatment works? We already have "the Smelly Mile" in our locality, Stainland Road from West Vale to the Calder and Hebble; additional sewage treatment will not do anything to improve the air quality here. I have recently read a document taken from the Council's Planning website, entitled "Local Plan Initial Draft 2017" in respect of Site LP0177. Never have I seen a report so heavily slanted in favour of it's paymaster, David Wilson Homes, and so obviously commissioned and prepared by a well practiced Specialist Planning Consultant, who probably lives many miles away and will, therefore, be unaffected by the consequences of this development, and who has spent only a couple of days surveying the area and really knows nothing about our community and it's way of life, and in order to satisfy the ulterior motives of some members of Calderdale Council to drive this development through whatever the cost. Some of the statements, comments and responses in each of the Site Assessment Categories are so theoretical and standard that they could have been taken from the manual "How to Get Your Development Through the Planning Hoops" and could have been prepared at a Consultants desk in the Outer Hebrides with the aid of Google Maps and aerial photographs. To prepare a report that truly reflects the conditions and consequences of such a major development, you need to live in the village, you need to use the services and facilities, and you need to know and understand the community, the habitat and the behaviour of the people and the wildlife that is home to all of us. So do I agree with the site assessment? ABSOLUTELY NOT! I have not used the on-line Planning Portal because it isn't easy to navigate and I felt it was easier for me to speak from the heart in a letter. But please ensure my letter of objection is added to the many other similar letters you may receive.

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

Duty to Co-operate Reason:

Please refer to all previous comments

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU315**

Site ref (if applicable): **LP0026**

Person ID: **1128222**

Name: **Mrs Bennett**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

With specific regard to Community Involvement I do not believe that community involvement is in general accordance with the Calderdale Statement of Community Involvement 2015. Section 1.2 of the Calderdale SCI 2015 calls for Clarity. -“We need to be very clear about what we are asking people and we must be sure that people understand what will happen as a result of this engagement. This includes being clear about what decisions have been made, what have not, and who will make the final decision.” Until a recent local meeting on January 27th, and a local action Facebook group was set up, very few people in the Greetland Ward were aware of the Local Plan and proposed new allocations within the area. - It is unclear that site allocations submitted in the 2018 draft plan are still in the Local Plan and hence people do not have a clear picture of all the site allocations included. This makes a significant difference when looking at percentage growth of a community. - many people including myself are not clear on what we are being asked with questions such as 'is the plan legal'? 'Do you consider the plan complies with Duty to Co-operate?'. - With regards to LP26, LP177, LP952 and LP1625: Greetland, Sunnybank and West Vale Wards still remain part of Elland. This is misleading and means some residents would take a look at the initial directory of new site allocations, and failing to see Greetland on there, think that there is no inclusion in their area. I made this error in the 2017 submission process until corrected by a neighbour. - The SCI under section 1.3 states -“to keep the process simple” and -“to make it easy to get involved” Asking questions such as -“is the plan legal” is not simplistic as most people outside of a planning department would not know the answer to this question and would potentially be put off contributing. - I do not think it has been easy to get involved. Most people, in a room full of over 200 people at a recent local meeting, did not know where to find the local plan or how to go about commenting. This is also evident by the fact that Councillor Paul Bellenger has pushed the Head of Calderdale Planning for an email address, external to the online portal, to try and make it easier for people to comment. The council has provided a Sustainability Appraisal Report. However, under the chosen Option 4, of the 17 objectives analysed, 9 of them have been marked as -“uncertain” impact. I question how fully this report has been used as a 'tool for appraising policies to ensure they reflect social, environmental and economic factors' when the impact to the Greetland community at local site level of so many key outcomes are also uncertain including: accessibility to essential services, facilities and employment; to reduce the risk of flooding; to reduce the effect of traffic on the environment etc.

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

Sound Reason:

Justified - in choosing the sustainable option has the council considered the impact of Brexit on economic growth and resulting housing requirements? has the council ruled out all other sites such as Brownfield and less site sensitive sites? Positively prepared - has the council consulted other neighbouring authorities to see if they can accommodate potential sites as opposed to destroying greenbelt in an area like Greetland that already requires most people to travel to work by car? Effective - placing such a significant number of houses in such a small community is not deliverable and there are no significant infrastructure plans in place to evidence that it is sustainable. Is the plan consistent with national policy? No, my summarised objections to this site allocation are: - disproportionate growth of 33.8% to the Greetland Community which contradicts Greenbelt policy to restrict urban sprawl - No exceptional reasons to remove Greenbelt status - Strains on existing road and junction infrastructure with little planned mitigation for these new proposals - Loss of habitat and wildlife - Unmeasured impact on air pollution for both the area as a whole and the local primary and preschool sites on Saddleworth Road. These objections are substantiated below to relevant policy. Disproportionate increase to the Greetland Community. - LP26, LP177, LP953 and LP1625 are so close in proximity that they should be viewed jointly as well as individually. Calderdale Infrastructure Delivery Plan 2019, Table 3 shows the Distribution of household growth for 2018-33. It incorporates Elland, Greetland, Stainland and Holywell Green into one group. As such, expected percentage change in household growth is 8.21%. - This fails to give the Inspector a clear image of the distinct communities within our wider area. This is an oversight as the NPPF under Achieving Sustainable Development Section 2, point 8 states a "social objective" "to support vibrant and healthy communities. The Cambridge Dictionary defines community as - "the people living in one particular area" Elland is 2.4 miles from Greetland postcode HX4 8PG and as such should be considered as a separate area. (Apple maps). Looking at the ward map for Calderdale, the community of Greetland should be defined by the interlinking of the Greetland and Sunnybank wards, with the possible inclusion of West Vale. This is due the proximity of the housing in these wards and the significant infrastructure and environmental effect that would be concentrated in this space. See link for ward map: www.calderdale.gov.uk/v2/maps/offices-political Under the Calderdale Review of Polling Districts 2019, the number of properties per polling district is as follows: - Greetland 1221, Sunnybank 505, West Vale 1119. This totals 2,845 properties. - Under additional local site assessment reports LP26, LP177, LP952 and LP1625 are all in immediate vicinity of Greetland and Sunnybank wards. Combined we would see 543 additional new houses built in this distinct community on top of capacity allocated in the 2018 plan. As a percentage of the 3 wards this would see a disproportionate growth of 19% or 22.4% when adding in the 2018 site allocations. - Many locals have further purported that the West Vale Ward is a community in itself (having its own primary school) which would take growth of Greetland and Sunnybank to 31.4% or 33.8% when including 2018 allocations. (<https://www.calderdale.gov.uk/v2/sites/default/files/Returning-Officers-Recommendations.pdf>) Within the Potential Sites considered and rejected report CC37, LP1028, which is also in Greenbelt, had a planned site of 122 dwellings removed. One of the reasons stated is that it would give a "disproportionate increase to Barkisland village". The increase based on the same dataset above would have been 16.6%. If Barkisland can be pulled out of its grouping with Ripponden and Rishworth then we suggest that Greetland can be distinguished from Elland. If 16.6% is disproportionate to one village why is 22.4% or even 33.8% not disproportionate to another? Perhaps the answer to this is sadly in the other reason why LP1028 has been withdrawn lack of interested developer! This shows lack of consistency in application of NPPF policies. Furthermore, The Sustainability Assessment Report for LP26, OBJECTIVE TO CREATE AND RETAIN HEALTHY VIBRANT AND INCLUSIVE COMMUNITIES has been given as 'overall impact is positive as the site is within a 0-15 minute journey of a town centre; is within 600m of Public Open Space; and within a 15 minute journey to a GP surgery'. This fails to take into account that the massive increase in traffic from the combined sites will increase travel time substantially, is reducing open space by building right next to a public footpath where people enjoy the view of open space and the local GP surgery is full and may no

longer be within 15 minutes due to the increase in resulting traffic . The Cabinet report on Potential Modifications to the draft Local Plan paragraph 1.4 states that ' a sound Local Plan delivers a sustainable scale and distribution of new homes....whilst protecting and nurturing our environment'. - This scale of distribution (22.4-33.8%), within one village community, is not sustainable given the infrastructure shortfalls of traffic, schooling and other services. - The Sustainability Assessment reports for all 4 LPS for OBJECTIVE 5 TO IMPROVE ACCESSIBILITY TO ESSENTIAL SERVICES, FACILITIES AND EMPLOYMENT have been marked as positive yet they all note the risk of demand on existing services whilst not making plans for mitigation. - This also contradicts the purpose of Greenbelt to restrict urban sprawl (paragraph 134 NPPF) and would also decimate 23.74 hectares of Greenbelt with no exceptional circumstances given (measurements taken from Local Plan Assessment Reports). - This also contradicts the purpose of Greenbelt to -“ assist in safeguarding the countryside from encroachment”- All 4 LPs against The Sustainability Assessment of OBJECTIVE 13 TO ENSURE EFFICIENT USE OF LAND have been marked negative as it is all greenbelt. - Whilst we may be 'close' to transport investments (paragraph 1.5 Potential Modifications report) such as the A629 and potential Elland station etc the fact remains that most people will get in a car to get to these links. The only way to do this is via the 2 bottleneck crossroads in West Vale. - Graphs found on city ward explorer shows Greetland and Stainland as already having the highest percentage of cars per household in Calderdale at 84%. Equally it also shows that the average distance travelled to work is 13.2km. - By creating more houses in this area it will only add to congestion and air pollution which will not assist the council in reducing the Green House Emissions noted in paragraph 4.15. Nor does it support the councils wish in paragraph 4.2.1 to reduce car use. Additionally. Paragraph 103 of the NPPF states -“ Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health”- There are no immediate plans for economic employment growth in Greetland hence no limiting of travel to the additional proposed 543 dwellings. In all likelihood we will see a significant increase in car usage as existing buses that service west Greetland are small and infrequent. - The LP is also over 2km from a railway station. NPPF Paragraph 108 states that -“in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: a) appropriate opportunities to promote sustainable transport modes can be ; or have been ; taken up, given the type of development and its location; - The location of the site in an out of town Greenbelt area lends itself to car use - 84% of this population own a car. b) "safe and suitable access to the site can be achieved for all users;" - The Sustainability Report for LP26, Objective 2 to improve safety and security, shows an uncertain outcome hence this has not been ensured. The junction of Scar Bottom Lane and Gate Head Lane which are most directly effected by LP26 and LP952 is not adequately mitigated. In order to accommodate the resulting traffic and proposed roundabout the road would need to be widened, thus removing trees under Tree Preservation Orders. There would also be a knock-on effect of danger to the top entrance of Brian Royd Lane. This lane (as an extension to the lower part of Scar Bottom Lane) has restricted visibility and is already used as a cut-through. This will only get worse. - Equally, no mitigation had been put in place to improve road safety outside Sunnybank Preschool and Greetland Academy which is already frightening at peak times of day with school traffic, tractors and Sonoco HGVs. - Calderdale are also planning the creation of an A58 Ripponden HGV Turning Circle. This has a significant impact on the Greetland area as it will encourage HGVs onto Saddleworth Road. I picture a mini roundabout at the bottom of LP26 with HGVs coming from the west, SONOCO trucks from the east, the local bus from the north oh and hundreds of new residents and the usual tractors! This is not safe or suitable access! - NPPF Paragraph 111 states -“All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed”- I ask the council to define 'significant amounts of movement' and ask do the sites combined represent significant amounts of movement and has a travel plan for these combined developments been or needs to be generated? Major development is defined as: - “For housing, development where 10 or more homes will be provided, or the site has an area of 0.5

hectares or more" suggest that the combined LPs area of 23.7 hectares will lead to significant movement. In order to be 'sound' and in accordance with the NPPF the plan should be positively prepared 'on a strategy which seeks to meet objectively assessed development and infrastructure requirements'. - With reference to the Calderdale Infrastructure Delivery Plan, Table 5: Congested Locations and Associated Funding Opportunities, the location of Stainland Road/Saddleworth road is considered and notes "upgraded signal improvement and localised traffic management needed". - This will be woefully inadequate for potentially 1000 extra cars as evidenced by the outburst of laughter at a community meeting when suggested that signalling upgrades enough would be sufficient. In fact WSP Parsons Brinckerhoff Report on Transport Network states traffic congestion at the juncture of Stainland Road-Saddleworth Road would increase by approximately 105%. The junction is already maxed out. - The infrastructure plan also highlights investment needed in West Vale and buses given priority. However, many of the bus stops in Greetland are unsafe, based on opposite sides of the road and are on routes which are too narrow so a complete overhaul of the bus infrastructure would be needed to accommodate this many people. - I do not feel that an adequate infrastructure plan is in place for this level of growth in one village community. The lack of infrastructure also contradicts paragraph 72 of the NPPF: NPPF 72. "The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:" - Calderdale does not have the support of the Greetland Community, only that of a couple of individual landowners and private developers. 33.8% is a 'significant extension' and we have not seen a thorough investigation of infrastructure requirements at a level local to Greetland. "a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains; " - With the destruction of 23.74 hectares of Greenbelt there will be no environmental gains, only significant losses to wildlife. The areas covered by LP26, LP177, LP952 and LP1625 represent a wildlife corridor home to deer, badgers, bats, owls, herons and many more species. "b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations)" - As a community we have seen no plans for sufficient access to services. The local school, doctors, dentists etc are full! A community should not be grown to the extent stated above without mitigation certain and planned. - The Calderdale Sustainability Report for Option 4 shows uncertain impact for accessibility to essential services. Also, the sites are more than 2km from a railway station and have limited bus services and thus access to sustainable forms of transport. This also goes against policy guidelines. Flooding - I also question the ability to build quickly on LP26, LP177, LP952 and LP1625 due to local flooding issues. Many of these issues occur further up the hill in Upper Greetland with natural spring water that flows from Norland. There are ample cases where spring water has been diverted either naturally or due to building works and this then has a knock on effect on to the LPs states. This is often due to water that has been diverted due to building higher up and insufficient up-keep of pipes on private land. - In addition to surveyance of LP26, LP177, LP952 and LP1625 a full investigation of the water flows throughout Greetland needs to be conducted. LP26, LP177, LP952 and LP1625 act as a flood plain for the whole hillside. Building on these run-off areas should not start until the knock-on effect has been calculated for the whole village. - Indeed, this links to information on the Planning Portal PPS15: Planning and Flood Risk which states "B10 New development, whether building works, engineering operations or changes in land use, can increase flood risk. Most simply, siting a building within an area likely to flood will increase the direct risks to that building. The greater the quantum of construction, the greater the consequences of a flood event are likely to be. While the direct consequences of flooding for a building are generally readily identifiable, less

obvious but equally significant indirect impacts can be caused elsewhere. <https://tinyurl.com/vyeaxrr> Is the council satisfied that indirect impact of flooding elsewhere in the area has been adequately assessed and risks mitigated? - The Sustainability Assessment report for LP26, OBJECTIVE 7 TO REDUCE THE RISK OF FLOODING AND RESULTING DETRIMENTAL EFFECTS ON PEOPLE AND PROPERTY is reported as Uncertain. 'Overall the impact on this SA Objective is uncertain, and any impact will be dependent on the design of any future development and any mitigation measures.' How can land be released when a full risk assessment has not been carried out? - LP177 has a negative outcome for this objective. NPPF paragraph 91 states "enable and support healthy lifestyles, especially where this would address identified local health and well-being needs ; for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling." - Building on LP26, LP177, LP952 and LP1625 would have a detrimental effect on healthy lifestyles of the Greetland Community. These open spaces are often used for walking. The effect of existing open space on the community's mental wellbeing is also important. The World Health Organisation on its own website states: "Green spaces also are important to mental health. Having access to green spaces can reduce health inequalities, improve well-being, and aid in treatment of mental illness. Some analysis suggests that physical activity in a natural environment can help remedy mild depression and reduce physiological stress indicators." <https://www.who.int/sustainable-development/cities/health-risks/urban-green-space/en/> NPPF 94. "It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education." - The current capacity of Greetland Academy on a split-site is well suited to the size of village. Currently, children within the village can access the school with intake occasionally taken from some surrounding villages. If over 600 new houses are built then a situation will arise in which demand will outweigh supply, families who live in Upper Greetland, and even close to the KS2 site, will be forced to leave the village and drive to other schools to find a place as they will no longer be in the catchment area. Greetland Academy is already a 2 class intake. This enables it to maintain a village school atmosphere. As an Academy this school cannot be forced to expand so where is the plan for additional school places? NPPF Paragraph 117 states - "Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land" - Is the Inspector satisfied that Calderdale has fully investigated all brownfield sites for housing purposes? Residents are not convinced this is the case! Greenbelt is being destroyed because developers are more interested in building on it! - The inclusion of this number of homes along Saddleworth road will significantly increase air pollution and I would challenge Calderdale Council to model this effect in order to understand true mitigation. This is especially serious as the location is so close to a primary school and a preschool. The locations of these schools are on the main road and at water level. We have seen no modelling of the potential increase in harmful emissions that I am aware of and the effect this would have not only on the wider community but vulnerable school children. - The NPPF under paragraph 170e highlights that new developments should not add to air pollution. Increased car usage from over 600 new houses will lead to increased air pollution. Objective 10 in The Sustainability Assessment reports for all of these LPs in Greetland has been marked uncertain and hence these plans are not necessarily in coherence with the NPPF because the plan does not ensure that there will not be an increase.

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

Duty to Co-operate Reason:

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

and b require preparation of local plans. Point d however calls for "activities that can reasonably be considered to prepare the way for activities within any of paragraphs (a) to (c) I question if Calderdale has sufficiently carried out all all activities needed to form a sustainable local plan with specific reference to show that release of Green Belt in LP26, LP177, LP952 and LP1625 meets exceptional circumstances?: - i.e. has all brownfield been explored as per NPPF paragraph 137? Has land recently regraded to brownfield on LP177 at the end of Ellistones Lane, and pending vacation of the Freundenberg factory been considered? It is CPRE's view after meeting local residents that they consider these brownfield sites broadly positive. - I also question if there has been adequate exploration of infrastructure requirements and mitigation for a 33.8% growth in a community? -The council has provided a Sustainability Appraisal Report. However, under preferred Option 4, 9 of the 17 objectives analysed have been marked as -"uncertain" impact. I question how fully the necessary 'activities' needed to form a sustainable plan have been carried out? e.g. risk assessment and necessary mitigation. How can a plan be sustainable and Green Belt destroyed when there are so many question marks? At a site level: LP26 has 10 uncertain impacts, 1 negative and only 1 positive LP177 has 9 uncertain impacts, 4 negatives and only 3 positives LP952 has 11 uncertain impacts, 2 negatives and only 3 positives LP1625 has 11 uncertain impacts, 1 negative and only 4 positive Disclaimer: I am a lay person, not a lawyer or planning expert and refer back to my comments under 'is the plan legal'. If these questions have been answered incorrectly or insufficiently it is due to the process having neither clarity or simplicity of use.

Suggested Modifications:

I feel that there more adequate site assessment including greater risk analysis is necessary before a site allocation of this number can be released from greenbelt and the plan deemed sustainable. Also, I'd ask the council to revisit an analysis of brownfield sites for any new and existing opportunities both in our authority and within neighbouring authorities.

Comments:

Additional Evidence Link:

Comment ID **HRU320**

Site ref (if applicable): **LP0026**

Person ID: **1241732**

Name: **Mr. Cory Greidanus**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

See below.

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

Sound Reason:

Main points of Objection : Flooding Risk Loss of large area of Green Belt and Wildlife Corridor Current Chronic Congestion in West Vale, and the effect on Air Quality Lack of Infrastructure 1. Flooding Risk The risk of flooding to the Greetland and West Vale areas, as well as further downstream into Elland, are of paramount importance in my objections to development on this site. I have lived adjacent to site one of the sites in question for the past 18 years, and have witnessed serious flooding along the Black Brook in 2004, 2007, 2012, 2015 and 2019. Most other years there is flooding to some extent. The flooding of these sites

is a regular occurrence, not a one-off event. The flooding that happens right across these sites is natural, because these are flood plains, and this is a perfect example of a flood plain at work: soaking up excess water at times of heavy rainfall, allowing space for the water to flow and be stored in times of flood, protecting land further downstream from potential flooding. The Environment Agency defines a high-risk flood zone as one where there is a 1 in 100 chance of flooding in any given year. This field floods far more often than that. I've attached a screen shot taken directly from the Environment Agency website, which shows the extent of flooding from surface water across the site. The sites being discussed for inclusion in the local plan are Level 3a flood risk. The DEFRA 25 year plan states: "National flood management involves the use of a variety of measures, including tree planting, river bank restoration, building small scale woody dams, reconnecting rivers with their flood plains, and storing water temporarily on open land." Developing this floodplain area would be in direct opposition to National flood management. The exceptional floods of Boxing Day 2015 led to much damage further downstream, and eventually to the collapse of Elland Bridge. The repair bill for the bridge alone came in at £4 million, while the total economic impact to the Calderdale and Kirklees regional economy amounted to a total of approximately £170 million. (Economic Impact Assessment of the Boxing Day Floods (2015) on SMEs in the Borough of Calderdale) If the proposed scale of development along Saddleworth Road is allowed to go ahead, and these valuable flood plains are built over, then the events of 2015 will become a much more regular occurrence, leading to untold costs to the communities of West Vale, Greetland, Elland, and even further downstream. The current policy and legislation on flooding states - "due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere. And Chapter 14, paragraph 163 of the NPPF states: - "When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere" Including these precious flood plain areas into the Local Plan, and putting them forward for future developments is ludicrous. It will obviously increase the flood risk to the development's community, and it will increase the flooding danger elsewhere. I believe this is a strong enough argument on its own to remove this site from the Calderdale Local Plan.

2. Loss of large area of Green Belt and Wildlife Corridor Protecting or Wildlife Corridor and Green Belt is very important to me. Esther McVey, our current Housing Minister agreed, when she wrote in her policy on Green Belt land: "protecting the Green Belt goes beyond protection against development" Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: (i) to check the unrestricted sprawl of large built-up areas (ii) to prevent neighbouring towns merging into one another (iii) to assist in safeguarding the countryside from encroachment (iv) to preserve the setting and special character of historic towns (v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The site LP0026 as it currently exists as a Greenfield site performs strongly with this criteria. Development of this site seems to fly in the face of the NPPF information. DEFRA (Department for Environment, Food & Rural Affairs) says in their 25 year plan: "New development will happen in the right places, delivering maximum economic benefit, while taking into account the need to avoid environmental damage. We will protect ancient woodlands and grasslands, high flood risk areas and our best agricultural land." Developing site LP0026 also contradicts this. Having lived adjacent to the site for 18 years, I regularly see Herons flying past. Tawny owls and deer are regular visitors, as are bats, foxes and hedgehogs, and I have seen badgers also. The Black Brook is home to Brown Trout. The DEFRA 25 year plan also states their aim to: "Develop a Nature Recovery Network to protect and restore wildlife, and provide opportunities to re-introduce species that we have lost from our countryside" must do everything we can to protect the wildlife in this Wilderness Corridor. The Developing this site with homes would destroy this precious Eco-system. "Having access to green spaces can reduce health inequalities, improve well-being, and aid in treatment of mental illness" says the World Health Organisation. We need to be protecting this space, not developing it.

3. Current Chronic Congestion in West Vale, and the effect on Air Quality The traffic lights in West Vale, at the junction of Saddleworth and Stainland Roads are a joke. Huge queues extend back up Saddleworth Road (and Rochdale Road) in both directions, as well as up Stainland road every morning, and again each evening. There is simply too much traffic now for this junction to work. Add in an accident on

the M62, and suddenly things get far worse again. Major plans may be in place to improve the A629 into Halifax, but these plans will do nothing to alleviate congestion through West Vale and Greetland. If the proposed developments are allowed to go ahead along Saddleworth Road, the congestion will be made much worse yet again. In fact, the WSP Parsons Brinckerhoff Report on Transport Network states that the traffic congestion at the juncture of Stainland Road-Saddleworth Road would increase by approximately 105%. Which means that the daily suffering of every resident of Greetland, West Vale, Stainland, Elland, Barkisland, and surrounding area that needs to get through this junction every day is going to be made 105% worse. The proposed development cannot be allowed to go ahead on this site. The effect on Air Quality that all this congestion causes is undeniable. Young children walking to school each day face walking for hundreds of yards past long queues of idling traffic waiting to get through West Vale traffic lights. Greetland Academy actually sits right on Saddleworth Road, as does Sunnybank Pre-school, often with queuing traffic right past the site. West Vale Primary School is right on Stainland Road, surrounded by queues of idling traffic. There are seven existing large companies in the immediate area with Lorries that rely on the motorway, many of which travel up and down Saddleworth road each day, adding to the congestion and the pollution. Air pollution is the biggest environmental threat to health in the UK, with between 28,000 and 36,000 deaths a year attributed to long-term exposure. There is strong evidence that air pollution causes the development of coronary heart disease, stroke, respiratory disease and lung cancer, and exacerbates asthma. This information comes from Public Health England (PHE) in a report from 11 March 2019, in which Professor Paul Cosford, Director of Health Protection and Medical Director at PHE, said: "Now is our opportunity to create a clean air generation of children, by implementing interventions in a coordinated way. By making new developments clean by design we can create a better environment for everyone, especially our children. Key interventions local authorities can take include: redesigning cities so people aren't so close to highly polluting roads." The proposed development plans along Saddleworth Road are in complete contrast to these Public Health England recommendations. They want to build new communities directly on already highly polluted and congested roads, increasing the threat to all of us. We cannot let these plans go ahead.

4. Lack of Infrastructure Local Schools are full - both Greetland Academy and West Vale primary schools, as well as the secondary school, Brooksbank in Elland. With a proposed 600 houses, using Calderdale MBC's figure for school places of .36 per household (IDP section 9.14) this indicates another 206 places would be needed. And long term residents of Greetland would suddenly see themselves pushed out of the catchment area of their own local school, at the expense of 600 new homes built on Green Belt land surrounding the existing school. The local dentist has a waiting list of 600 for NHS places. The nearest NHS dentist was recently found (July 2019) 11 miles away in Kirklees. The GP Surgery would be strained to take this proposed capacity. There would also be a further strain on local Hospitals. The proposed plans make no provision for extra school places, let alone Doctors and Dentists. The infrastructure needed to accommodate the size of the proposed development simply does not exist, so the proposed development must not be allowed to proceed.

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/5600211> ; <http://calderdale-consult.objective.co.uk/file/5600188>

Comment ID **HRU326**

Site ref (if applicable): **LP0026**

Person ID: **1242362**

Name: **Mrs Elaine Scott**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

It ignores all planning advice/requirements regarding environmental and social issues.

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

Sound Reason:

No proper account is taken of the following Flood risk - we are all aware of the devastation caused in Elland in 2015 . Development on this site would increase the risk of future flooding lower down the valley and into Elland. Preservation of wildlife corridor - this area is home to many species of wildlife deer,foxes,rabbits ,squirrels ,heron ,owls ,sparrow hawks and bats are all frequently seen and should be protected. Congestion in West Vale leading to further reduction in air quality and potential health risks for this and future generations. Lack of infrastructure- local schools are already oversubscribed ,GP and dental facilities would be unable to accommodate the increase in population . The bus service in this area is infrequent and would not serve an increased population adequately, the lane at the side of this site is not wide enough for 2 cars to pass which would cause further congestion and for most of the lane there is no footpath for pedestrians so totally unsuitable access to a housing development. There is a public footpath through this and other sites in the development plan which are used by groups and individuals (many from outside the area) enjoying the beauty of open space, and enhancing their physical and mental wellbeing,even if these paths are preserved they would simply become snickets through a housing estate! The Defra 25 year environment plan clearly states we will protect ancient woodlands and grasslands,high risk flood areas and our best agricultural land .Protect our green belt to make this land a breathing space for our urban populations to enjoy and our wildlife to flourish. NPPF explains in paragraph 80 the 5 purposes of green belt land I think this speaks for itself , any development on this site goes totally against those 5 functions and against the Defra plan .

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

Duty to Co-operate Reason:

The consultation period is the minimum . Very little information has been given to local residents who therefore have insufficient time to consider ,prepare and submit objections.

Suggested Modifications:

The only option is to remove this site from the plan and consider more suitable brown field sites.

Comments:

Additional Evidence Link:

Comment ID **HRU340**

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:

See comments attached

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

Sound Reason:

See comments attached

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

Duty to Co-operate Reason:

See comments attached

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5600221>

Comment ID **HRU341**

Site ref (if applicable): **LP0026**

Person ID: **1239031**

Name: **Miss Lisa Drinkwater**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Legal Compliance Do you consider the plan to be compliant: No 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. Calderdale Council in updating the plan to include this site have not taken into consideration or addressed the implications that it will cause. Paragraph 177 of the National Planning Policy Framework (NPPF) and the PPG in the Sustainability of Greenbelt sites. This site is home to many protected species including Great Crested Newts, bats that roost in the surrounding mature trees that are protected by Tree Preservation Orders, barn owls, woodpeckers, hedgehogs and at least two breeds of deer. The wildlife & Countryside Act (as amended)1981, The Conservation (Natural Habitats &c) Regulations 1994 and the Countryside & Rights of Way (CROW) Act 2000 are all being contravened by including this site back into the Local Plan for development. Although the Calderdale Council's Senior Planning Officer recently stated at a Local Plan Meeting that they had saved much Greenbelt, the fact is they have proposed to build on even more Green Belt in Greetland than on the previous agreed Local Plan. Indeed the inclusion of sites in Greetland including site LP0026 is the majority of Greetland's existing Green Belt. Esther McVey, the current Housing Minister's written policy on Green Belt land states -"protecting the Green Belt goes beyond protection against development" and -"Greenfield sites should not be what we turn to, not what we look at first.

Every blade of grass must be looked at before it is changed." This site is at the beginning of the Green Belt in Greetland on the North side of Saddleworth Road and although it has houses to one side of it. The other sides are surrounded by Green Belt and are quite visually stunning. It is a wildlife corridor and acts as a buffer against urban sprawl that stops Greetland merging into Barkisland. I refer to parra 80 of the NPPF. CMBC has already stated that - "The site 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" The Council in its own evidence concluded that this site is located and performs strongly when assessed against the five Green Belt purposes and when assessing the revised boundary of the specific site it also performed strongly. Therefore by definition development of this site would be inappropriate and would be harmful to the existing Green Belt. No special/exceptional circumstances have been demonstrated to outweigh the harm that would be caused by development and therefore this proposal is contrary to Section 13 (Protecting Green Belt Land). I also refer to the judicial review ; Calverston Parish Council v Nottingham city Council, Boxtowe Council and Gedling Borough Council (2015) EWHC 1078 ; where the representation for the Claimant submitted that the fact that a particular site happens to be suitable for housing development cannot, without more, constitute an exceptional circumstance justifying an alternation of the Green Belt. Of the 17 x Sustainability Assessments, this site has 10 x Uncertain Assessments and 1x Negative Assessment.

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

Sound Reason:

Flooding This site is prone to flooding and although due to its topography in that the land slopes (as its on the side of a valley) and undulates, it does capture the water coming off the top of the hill including Norland Moor it very quickly becomes boggy, indeed the bottom next to Saddlewoth Road is marsh land and it has been seen numerous times through the year that water pours out of the dry stone wall onto the pavement and onto the road itself. The drains along Saddleworth Road are already not fit for purpose with numerous leaks and serious gushers reported in 2019 that involved parts of Saddle worth Road being closed off completely for days at a time. Development of this site will only cause the water to run further downhill onto a site which is also being proposed for development LP0952. Without these two sites the water is going to run straight into the river and cause more flooding at the bottom of the valley and downstream which will not only damage homes but will also damage businesses and bridges (Elland Bridge was wiped out in 2015) and will therefore harm the economy. Flooding would only become worse and more frequent if the site was developed and although SUDS could be considered the number of homes proposed would render mitigation of harm to wildlife and flooding null and void, and marsh land or pools could also be a danger to children. Wildlife Any development would also cause harm to the root system of the Protected trees that line the North and North West side of the site and any felling of branches to accommodate houses could leave the trees open to infection as has been seen at the top of the field when only recently 3 mature protected trees had to be felled due to disease because the tree's root system and branches had been tampered with by building of a new home on the site of some old cottages that had been demolished. The existing protected trees left on this site are home to insects, bats and owls to name but a few. The field itself not only acts as a sponge for excess rain water but also as a carbon sink improving local air quality. There is also a public footpath that runs to the North side. Light pollution will disturb nocturnal creatures not only that dwell in this site but also the surrounding Green Belt. Noise pollution from the number of homes being proposed and the increase traffic using Saddleworth Rd and Scar Bottom Lane will also disrupt wildlife and existing home owners. Air Pollution/Congestion LP0026 is on Saddle worth Road, as are ALL the other proposed sites in Greetland. This is where our Green Belt is and it has done its job in mitigating the noise and air pollution caused from the traffic on his very busy road. Further up Saddleworth Road is a large recycling plant and business park at Bowers Mill who both use Saddlewoth Road on a daily basis. Both sites use large lorries for their businesses not to mention the chemical plant at the bottom of the valley. This coupled with the home owners commuting to work in Halifax and beyond

causes the junction at the bottom of Saddleworth Road in West Vale to be incredibly busy from 6.30am onwards. 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. There is also the further junction 50 or so meters to the left where Rochdale Road meets Stainland Road to also take into consideration. 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. Although the M62 is not very far away it is difficult to access due to congestion and the narrow roads. Also the M62 is already very busy and I understand that a Highways Report previously submitted already recommended against any further development in this area. Creation of Homes of Incomers There is a fear in the community that to support the need for economic growth that more houses will be build for incomers, who will need to commute to work outside of the area. This would seem to be supported by the plans already drawn up by developers for the site along Saddleworth Road that are not aimed at first time buyers but are 4-6 bed-roomed houses raising the question of the failure to build the right homes in the right places. Yes more affordable homes are needed but these should be nearer urban areas there the amenities are to cut the costs of transport and therefore congestion. Indeed, if we are looking to the future we should no longer be building semi and semi-detached properties but building more flats and apartments that are more environmentally friendly and take up less space, negating the need to build on the Greenbelt. Impact on Greetland Village Greetland is a village it is not a town. It is not connected to Elland or Stainland (Which has no proposed sites included in the amended plan). The proposed number of houses along Saddleworth Road (1 single Road) is going increase the number of properties in the village of Greetland by at least 20%. This is not sustainable nor is it proportionate with the number of houses proposed for other areas. The proposed developments WILL create urban sprawl which is against what is recommended in the NPPF. Indeed the Councils own Greenbelt survey for site LP0026 indentified a 'High potential for unrestricted sprawl' and that it 'Performs an important role in safeguarding the countryside from encroachment'. Infrastructure Both schools in Greetland are full. Our local dentists have waiting lists in the hundreds for NHS patients. GP surgeries in the area are not taking on new patients not to mention how the increased numbers in the area would affect the hospitals. The water main and drains that run along Saddleworth Road are over 60 years old need replacing and are already unable to cope with the strain. As mentioned previously there have been numerous serious leaks though the tarmac last year that caused the road to be closed. The Council have already identified that building in the area will have a knock on effect for the M62. With regards to this site, the proposed entrance is onto Saddleworth Rd near the cross roads of Scar Bottom Lane and Gate Head Lane. This is a 40mph zone that is regularly used as a race track by many. As such it is a dangerous stretch of road that within the past 5 years has seen a fatality as a result of speeding. The proposal to put a roundabout at the crossroad/junction will do nothing; it will simply be driven over. Having the opening out from the site onto Saddleworth Rd will not only be dangerous so close to the cross roads but will also cause water runoff onto Saddleworth Rd that could be dangerous to road users, especially in heavy rainfall, which is becoming more and more frequent. We already have brownfield sites in the village and in surrounding areas that are not in the local plan that could be considered as

alternatives to this site. Building on site LP0026 would not preserve the openness of the greenbelt on this side of Saddleworth Rd, especially when site LP1407 to the north of site LP0026 was included in the Local Plan as a concession for the rest of Greetland's Greenbelt being removed last year. Houses being built on these two sites separate by the very narrow Brian Royd Lane will destroy the openness of the area making it dark and ruining the wildlife corridor. No special circumstances for building on this site have been demonstrated by the Council, as there should be according to the NPPF. With Climate Change we need our Greenbelt/Greenfields more than ever. For this area due to the unique topography and the fact that we are in a valley, these fields are our only Defence against flooding which is predicted to get worse by up to 70% in the next 50 years. Building here and on the other proposed Saddleworth Rd sites could pose a future risk to life as it would increase surface water and run off into the river at the bottom of the valley which will flood existing homes and businesses, this cannot be safely militated against. The Greenbelt also cleans our air, as well as providing mental benefits to those who live here and use the footpaths. Let the Greenbelt do its job and protect us against Climate Change before it's too late, once it's gone its gone forever.

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

Duty to Co-operate Reason:

It does not conform to Government Policy, nor does it confirm with current legislation with regards to building on the Greenbelt or on flood risk areas. It is not the role of the Council to release unacceptable sites within the Greenbelt to meet a housing target. The inspector's letter 16/07/19 notes at (Pare 14) that 'Local Plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrable outweigh the benefits'. The Council have not reviewed the supply of more suitable and available sites elsewhere as the additional sites are simply not suitable in the terms of the NPPF and current legislation. Also Developers should not be setting policy by dictating what kind of housing is build where, this is for the Council to determine. I therefore feel that the current amended Local Plan for Greetland which includes this site LP0026 is not fit for purpose and should be redrafted with the removal of this site and the others along Saddleworth Road.

Suggested Modifications:

Already addressed in Soundness.

Comments:

Additional Evidence Link:

Comment ID **HRU342**

Site ref (if applicable):

Person ID: **1242405**

Name: **Mr Michael Bridgman**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

It is clear that the sites on the Local plan in the Greetland area including this one, would constitute a disproportionate number of new homes being concentrated in one area It appears that insufficient regard has been afforded to the available brown field sites in the locality. So much so, that what are highly sensitive green field sites are likely to disappear completely impacting negatively on local wildlife. More

significantly, this development would, without doubt, contribute to additional flooding risks bringing into question the Council's Sustainability processes. It appears that the Council is releasing green belt sites that would increase flooding risks to meet a Housing target which in itself is totally unacceptable Climate change and environmental issues are very current and they will become increasingly important for all residents and all communities Air pollution levels and their impact will become much more acute if the number of houses proposed in this area are actually built. The proposals for electric vehicles are a long way off. In any case, these vehicles are not guaranteed to result in the environmental benefits which are currently being promoted by Government This fact alongside the totally inadequate public transport system for the current population let alone increased numbers, obviously means more cars, more pollution, more respiratory (and other) conditions and a much poorer quality of life for Greetland communities Surely this proposal is unsustainable

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

Sound Reason:

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU344**

Site ref (if applicable): **LP0026**

Person ID: **1242408** Name: **Miss Bryde Town** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

Please see attached PDF

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

Sound Reason:

Please see attached PDF

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

Duty to Co-operate Reason:

Please see attached PDF

Suggested Modifications:

N/A

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5600225>

Comment ID **HRU452**

Site ref (if applicable):

Person ID: **1242613**

Name: **Ms Rowena Burton**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

The proposals are not sound for any of the designated sites in Greetland for the following reasons:- The prediction of economic growth is based on out of date figures (2016) which were pre-Brexit. It is difficult to see where 600 new households in Greetland would find employment locally; it is more likely that we would be a dormer village serving Manchester and Leeds. When development is proposed, there is talk of affordable housing and best use of space, but in reality, developers are not held to account - all we see in this area are executive 4 or 5 bedroom homes that take up lots of space and don't serve the community. Most egregiously, the plans go against the NPPF's Green Belt policy: there would be -"unrestricted sprawl"- "merging of neighbouring towns" and no -"safeguarding the countryside from encroachment." West Vale and Greetland would become a huge housing estate without amenities, no sense of community, no visual amenity and no Green belt land for recreational purposes. There are still unused brownfield sites in Calderdale (including West Vale) so there is no evidence that there is an - "exceptional circumstance" to take away the Green Belt for ever, especially in an era when every person and institution should be doing their best to mitigate the effects of climate change. Development on Green Belt completely undermines your vision of -"a preserved, enhanced natural landscape," p.26 of the Local Plan Vision. People who live locally don't want to and should not have to travel on a daily basis to another recreational Green Belt area in Calderdale when they currently have open space and a wildlife corridor on the doorstep. The contention is that the proposed development is sustainable, but nothing could be further from the truth:- Siting development with the proposed access at the bottom of Scar Bottom Lane is problematic. The road is mostly unadopted, single track with no passing places and eroded at the top (combination of lorries and water). It will not be possible to stop potential new residents using Scar Bottom Lane as a rat-run between Rochdale rd and Saddleworth rd. The Highways department has already refused planning permission on several occasions because of access and safety issues on Scar Bottom Lane. Currently, there are long traffic queues at the traffic lights in West Vale (at both Saddleworth rd and Rochdale rd junctions) and not just in the morning and at the end of the working day. Road improvements on the A629, A58 and M62 will not help this situation as residents and those from outside the area forced to come through Greetland have to brave West Vale before reaching the improved road systems; indeed the improvements could engender more traffic keen to travel to bigger urban areas. The roads in the villages are single track with no viable prospect of changing to dual carriageway. 600 houses would involve at least 1,200 more vehicles on the roads leading to West Vale. Tinkering with the sequencing of traffic lights isn't going to help. It is already possible to smell and taste the air pollution on the approach to West Vale at busy times. A huge increase in the volume of traffic can only have a detrimental effect on the physical and mental well-being of residents. Levels of pollution may be illegal - when was a study last

carried out? The Council could already be in contravention of the Clean Air Strategy 2018. The schools (primary and secondary) and doctor's surgery are already oversubscribed. There is nothing in the plan to remedy this situation or the fact that regeneration in West Vale has been about restaurants and night-life and not about catering for the every day needs of the vast numbers of prospective new families in the area, were the plan allowed to go ahead. On page 24 of your initial Local Plan Vision you commit to - "ensuring the risks of flooding are significantly reduced." Building houses in Greetland flagrantly contradicts this intent. The lower areas of the proposed sites act as flood plains and uncharted springs and water courses are everywhere on the hillsides. Engineers who dealt with our flooding on Scar Bottom Lane in 2015 (the water from here then flooded properties and land below in Saddleworth rd environs - it has to go somewhere) said it would be very unwise to build on the hillsides or the flood plains as the water course is so unpredictable. Every year in this area, private property and land is flooded, but different people are affected because the course of the water changes. Losing the flood plains would cause a back-up of water further up the hillside and the loss of green land to development would mean more flooding as there would be nothing to absorb it on its journey. Stop press: the most recent flooding on 9/2/2020 clearly demonstrates why taking away Greenbelt land is reckless. We have had localised flooding on Scar Bottom lane for months now. The developers who own the land have failed to mend infrastructure which would have ameliorated the situation so the Council kindly agreed to sub-contract a firm to mend the pipes. The road was dry for a week until Ciara struck and demonstrated how the whole area is vulnerable to flooding.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU466**

Site ref (if applicable): **LP0026**

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:

LP0026 was not originally in the Local Plan. But the Council added this at a later stage. This was not made fully aware to local residents. There has not been enough time for consultation and discussion. In fact one of our Greetland councillors - Marilyn Greenwood said 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:

I do not believe that Calderdale Council should be breaching Green Belt areas. The Government has repeatedly stated that Councils should not be building on the Green Belt. GREEN BELT This plot LP0026 is in

Greetland Green Belt. The Green Belt was created to protect our countryside from being destroyed. It recognised the importance of clean air, open spaces, leisure areas and the need to offset carbon pollution and creating clean air. In the Calderdale Council 2017 review LP0026 fulfilled 3 out of the 5 criteria for the Green Belt. This rural field is the boundary of the Greetland Green Belt. It is necessary because it creates a barrier for the countryside. As Ester McVey MP, said 'once built on, it is gone, probably for ever'. Not only would we lose this field to Urban Developers, but it breaches the boundary of the existing Greetland Green Belt, and so could literally pave the way for further building along our valley, right up to Barkisland.

Although Calderdale have said that the Local Plan will only use 2% of the Green Belt, in Greetland this is 38% of our Green Belt. The Council have not provided any evidence of considering Brown Field sites at all. In fact at one meeting the Counsellor said that it was difficult to get developers to use Brown Field sites 'because it was too messy', and that developers preferred virgin green field because it was easier and cheaper. But there are grants for developers to use Brown Field sites, so why are these not being offered to the developers? I do not consider this to be robust reason for building on any Green Belt land. Councils are only supposed to even consider building on the Green Belt in EXCEPTIONAL circumstances. Laziness of thinking and planning is NOT an exceptional circumstance. Please do not let Calderdale Council ride roughshod over precious land and resources.

URBAN SPRAWL The 2017 Calderdale Review identified LP0026 as having a 'high potential for unrestricted sprawl'. We need to prevent Urban Sprawl, it is important that we do not breach this boundary. It separates our Green Belt from urban development and safeguarding the countryside from encroachment. We want to ensure that our Greetland Green Belt stays green. It is important that these green, open spaces are left for people to use and enjoy. Creating clean air, absorbing carbon, producing oxygen, promoting health and well being is what our Green Belt was created for, it is vital that we keep this land as Green Belt. With Global warming, there is a threat to our land from flooding, sea level changes, extreme and abrupt changes in weather patterns, extinction of plant and animal wildlife. We must protect this land from being built on. We need it, it's our future.

FLOODING LP0026 is not adjacent to Black Brook like some of the other Green Belt plots. But is it a flood risk. Throughout the Calder Valley there are hillside springs. LP0026 has many of these underground springs, which take water from the steep hillsides. In the 20 years that we have lived here, we have noticed how quickly these streams react to rain and storms. The water rushes down these springs, and LP0026 can flood quite easily. This flooding is mentioned in the assessments the Council have made. 67 buildings on this land will cement over this field, preventing natural run-off and absorption of water into the earth. This water has to go somewhere! Building 67 houses on LP0026 increases the immediate flood danger, and puts even more pressure on the rest of the valley.

TRAFFIC CONGESTION Greetland already suffers from congested traffic. The Council review stated it only took 15 minutes to get to Halifax Rail Station. This is just not true. It takes 25-30 minutes, and longer in the peak times. There is a bottle neck at West Vale cross roads. As well as this, Calderdale Council have put forward a plan to reduce traffic congestion in Sowerby Bridge by 12%, and this will be achieved by diverting traffic (especially lorries) through Ripponden, to the Rochdale Road and Saddleworth Road. Add potentially another 150 cars from New houses in LP0026, the Sonoco lorries, about 1000 extra from other proposed Green Belts sites along Saddleworth Road and we would have grid-lock, air pollution and traffic disruption on a daily basis. On top of that, there is a proposed roundabout to be built at the bottom of Scar Bottom Lane for access to this site for 67 buildings. Madness! Half of Scar Bottom Lane is an unmade, unadopted Road, and many of the other roads are narrow, windy and encased in dry stone wall boundaries. Extra traffic in Scar Bottom Lane would be untenable.

WILDLIFE There is a host of animals, insects and birds living in LP0026. We have Crested Newts in the field. 2 pairs of woodpeckers nesting in the trees on the boundary of LP0026, deers run through the field, hedgehogs grub in the field, pheasants and partridges nest there. In the summer months bats fly around the houses in LP0026. We listen to Barn owls in the trees. Building 67 houses would destroy the natural habitat for these creatures, and decrease all the wildlife.

GREETLAND COMMUNITY Greetland is a small community, in a narrow valley. It is mainly old stone built houses. There are approximately 1225 houses in Greetland. Building in LP0026, and LP0177, LP0952 and LP1625 will create nearly 600 new houses. That is just so disproportionate, an increase of almost 50%. Our roads are too small, our schools are full, the Doctors

surgery can't cope and the Dentist is full. 600 houses will change the nature of Greetland.

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

Duty to Co-operate Reason:

No idea what this means. maybe somebody from Calderdale Council could come along and explain?

Suggested Modifications:

Do not build on the Green Belt

Comments:

Additional Evidence Link:

Comment ID **HRU471**

Site ref (if applicable):

Person ID: **1242431**

Name: **Mrs Nicola Boon**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

1) Disproportionate amount of building in the Greetland area. The latest revisions to the local plan are deeply unsustainable development particularly the fact that a disproportionate amount of new homes are proposed on four sites in Greetland which for the plan is grouped under Elland. Within the plan 1,708 new housing sites have been proposed within the Elland area with 1,041 of these units (over 60%) proposed in Greetland when there are other sites available which won't place as much collective strain on one village.

2) Additional Flood risk LP0026 -Currently this site provides a natural overland flow storage area prior to it flowing over Saddleworth road down into Black Brook. It was evident on Sunday 9/2/20 following the rainfall similar to the 2015 Boxing Day floods that any hard landscaping/alterations to the natural characteristics of this area would provide further runoff onto Saddleworth Road and subsequently Black Brook. This land is vital absorption area to prevent overland flow therefore it is strongly advised not to develop on this piece of land. LP0177 / LP0952 / LP1625 All three of these parcels have demonstrated their unsuitability for development during Storm Ciara 8/2/20 & 9/2/20 whereby rainfall levels were close to the 2015 Boxing Day floods. Water has been visibly running over ground and within the ground down the sloping nature of the land down to Black Brook causing flooding to the properties along Black Brook and also contributing to the already at capacity River Calder causing extensive flooding. Parcel LP0177 which clearly lies with Flood Zone 3a has been particularly affected today with extensive flooding. Development will not ease or mitigate this flood risk as there is no substitute for nature's only defence within periods of rainfall which is a floodplain which this last is! The other two parcels did not necessarily flood to the same extent however the flow of water which these fields were taking today, from higher up the valley and Saddleworth Road runoff, provided important lag time to this flow further working with this natural defence mechanism which the valley holds currently. Development would destroy this natural defence barrier and also disturb the watercourses which aren't visible above ground such as the minefield

of uncharted natural springs ; which from local knowledge have been re-routed following excavation for developments causing issues elsewhere in the village. No amount of development engineering will be able to improve the hydrology of this valley. See photos below of Black Brook from 9/2/20

3) Sustainable development These pieces of land are clearly within an area of Greenfield and is a natural break in the boundary of the village into the countryside leading up to Barkisland with only existing farmsteads currently situated on the land. If these parcels are to be developed it would not be a sustainable development, it would merely be urban sprawl of a village. Sustainable development would be re-using Brownfield sites not Greenfield sites which are available in West Vale or less sensitive areas in Stainland which were removed from the previous Local Plan.

4) Traffic impacts West Vale is currently at breaking point with the amount of traffic which passes through on a daily basis therefore why would the situation improve with a further 600 homes. West Vale is a vital access route for the valley and surrounding towns and villages and with additional vehicles, a natural bi-product of development, would become dangerously congested. There is no obvious solution to ease the pressures of traffic on West Vale and despite attempts in process of improving the A629 junction, Rochdale Road crossroads still this doesn't make it acceptable to subject near double the number of vehicles as research shows below. WSP Parsons Brinckerhoff Report on Transport Network states that: "£ This report identifies that traffic congestion at the junction of Stainland Road-Saddleworth Road would increase by approximately 105% "£ This report also identifies that traffic congestion at the juncture of Stainland Road-Rochdale Road would increase by over 100%

5) Impact on Air Quality This undoubtedly will deteriorate with the development of any of these parcels due to increased traffic from both construction and occupants. This is why there is a need to plant more trees within the Ward. This will be negated by the building of so many houses. The current air quality needs to be assessed.

6) Infrastructure As a resident of Greetland who drives along Saddleworth Road and Brian Royd Lane daily I believe that the existing infrastructure of the village would not cope with the additional development proposed. Over the last few years there has not been a month gone by whereby there has not been a water main burst on Saddleworth Road due the aging cast iron water main which has still not been upgraded fully causing regular traffic disruption. The road itself is poorly maintained by the council and now you are wishing to subject to road to all the construction related traffic which would be as a result of development and furthermore the occupants upon its completion. Local Schools are all full - both Greetland Academy and Brooksbank, Elland. The land allocation has not made any reference to providing land for expansion of the Key Stage 1 site on Saddleworth Road which would be effectively surrounded by LP0177. Our children of Greetland would lose the rural outlook and ability to be taught about this vital wildlife corridor and would end up being brought up and educated in an urban environment ; as a parent of a Key Stage 1 pupil this outlook and important wildlife corridor was one of the attractive qualities of the Greetland Academy. With a proposed 600 houses, using Calderdale MBC's figure for school places of .36 per household (IDP section 9.14) this indicates another 206 places would be needed. Local Dentist has a waiting list of 600 for NHS places. The nearest NHS dentist was recently found (July 2019) 11 miles away in Kirklees. The GP Surgery would be strained to take this proposed capacity given when the practice is already on a waiting list basis for new patients with patient levels already at 11,334 patients in 2019 covered by 5 doctors. There would also be a further strain on local Hospitals. On the basis of the above points I strongly advise that the greenfield sites within Greetland are removed from the Local Plan in favour of more suitable sites.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5602890>

Comment ID **HRU472**

Site ref (if applicable): **LPO026**

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 involvement because 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. The Plan is not justified for the reasons set out below. According to the Council's own analysis in its review of the Calderdale Green Belt in 2017 plot LP 0026 performed well in the three of the 5 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; The other two are not relevant to this parcel of land. The Local Authority states that Green Belts have a positive role to play in fulfilling six objectives and this parcel meets five of them: -to provide opportunities for access to the open countryside for the urban population; -to provide opportunities for outdoor sport and outdoor recreation near urban areas; -to retain attractive landscapes, and enhance landscapes, near to where people live; -to improve damaged and derelict land around towns; -to secure nature conservation interest; and, -to retain land in agricultural, forestry and related uses. Given that analysis it is difficult to understand how this plot is appropriate for housing development. The Council has failed to specify the exceptional circumstances that must be present to develop Green Belt land. The NPPF states that the exceptional circumstances need to be -"fully evidenced and justified" When altering green belt boundaries in plans. Paragraph 137 of the framework clarifies that -"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 all other options for meeting its need for development" In her letter of July 16th 2019 Katie Child states, -"The Council suggested that the housing requirement of 840 dpa had been selected in order to limit Green Belt release, but were unable to point to specific evidence showing unacceptable harm to Green Belt purposes arising from higher housing requirements in the Cabinet Report" The Council needed to evidence the impact upon the Green Belt if it adopted a higher figure for housing over the period of the Plan. This is surprising given its own review of the Green Belt in 2017 which concluded that 390 of the 454 Green Belt parcels performed well and were classified as most sensitive including this parcel. The Report of The Director of Regeneration and Strategy presented to Cabinet on October 14th states that, -"the Inspector is not satisfied that there is an 'in-principle' reason to reject the notion of any further allocation of sites in the Green Belt" This is a mis-reading of her report. The Inspector's report states that the Council needs to specify and evidence the inevitable harm to the Green Belt if it adopted a higher housing figure over the period of the plan. The evidence that the Council failed

to provide is as follows. Building 67 houses on this land would extend the built-up area of Greetland and undermine one of the fundamental objectives of Green Belt designation. The development of this site would further contribute to the extension of Greetland towards Barkisland and Norland compromising the integrity of Greetland as a community. This is sloping land and in its site assessment the Council concede that a hydrological assessment would be needed before development is progressed. The site is poorly drained (see attached photographic evidence) and given the underlying Carboniferous sandstones it is unlikely that the installation of SuDS and green roofs will compensate for the loss of an area of agricultural pasture. The loss of this land will promote run-off into Black Brook and increase flooding frequency and extent. 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'. The site assessment claims that the ecological damage caused by the housing development is 'acceptable'. The barn owls, jays, greater spotted woodpeckers and bats which I have seen regularly over the last twenty years in and around this field may not agree that a housing estate of 67 houses will provide an acceptable habitat. The roe deer, foxes, grey squirrels, field mice, moles and shrews, again, regularly observed over the last two decades, that currently share the field with the sheep have no means to object to this development. Perhaps the Developers will be required to signpost the few square metres of 'buffer land' that they can continue to use. With regard to other issues. Highways The comments on the site assessment about highways relate to strategic motorway developments. This is at odds with the Council's own analysis of future work and commuting patterns. In its assumptions it does not envisage any increase in commuting in/out of Calderdale and the increased employment forecast is to meet the expected need within the Local Authority area. The Council should not be concerned about the addition of another junction on the M62 but rather it should prevent adding to the traffic bottleneck at West Vale by advocating this development. In the draft Infrastructure Delivery Plan it states, 'There is a need to provide improvements to the West Vale junctions as a while given their proximity and interaction. This will likely be in the form of upgrades to the signal operation and localised traffic management such review of waiting resulting and rationalisation of traffic movements'. Apart from not making sense this is an inadequate response to existing problems before the addition of 600 houses in Greetland of which 67 are designated on this site. Environmental Health In relation to environmental health again in its site assessment the Council claims that it can mitigate against the environmental impact of increased noise and air pollution but it does not state how this will be achieved. The cumulative noise and air pollution from 67 households with (at least) 67 cars will be significant and irreversible. Infrastructure The NPPF recommends that developments should have regard to the supply of school places and services. There is currently no provision in the Infrastructure Delivery Plan for the expansion of primary school places in Greetland and provision for only an additional 75 secondary places. There are no plans for additional surgeries. The proposed Revised Plan is not consistent with the NPPF as set out above.

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:

The Council needs to keep plot LP0026 as Green Belt and not develop it for housing to make the Plan sound.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5602891>

Comment ID **HRU473**

Site ref (if applicable):

Person ID: **1242613**

Name: **Ms Rowena Burton**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

The proposals are not sound for any of the designated sites in Greetland for the following reasons:- The prediction of economic growth is based on out of date figures (2016) which were pre-Brexit. It is difficult to see where 600 new households in Greetland would find employment locally; it is more likely that we would be a dormer village serving Manchester and Leeds. When development is proposed, there is talk of affordable housing and best use of space, but in reality, developers are not held to account - all we see in this area are executive 4 or 5 bedroom homes that take up lots of space and don't serve the community. Most egregiously, the plans go against the NPPF's Green Belt policy: there would be -"unrestricted sprawl"- "merging of neighbouring towns" and no -"safeguarding the countryside from encroachment." West Vale and Greetland would become a huge housing estate without amenities, no sense of community, no visual amenity and no Green belt land for recreational purposes. There are still unused brownfield sites in Calderdale (including West Vale) so there is no evidence that there is an -"exceptional circumstance" to take away the Green Belt for ever, especially in an era when every person and institution should be doing their best to mitigate the effects of climate change. Development on Green Belt completely undermines your vision of -"a preserved, enhanced natural landscape," p.26 of the Local Plan Vision. People who live locally don't want to and should not have to travel on a daily basis to another recreational Green Belt area in Calderdale when they currently have open space and a wildlife corridor on the doorstep. The contention is that the proposed development is sustainable, but nothing could be further from the truth:-A. Siting development with the proposed access at the bottom of Scar Bottom Lane is problematic. The road is mostly unadopted, single track with no passing places and eroded at the top (combination of lorries and water). It will not be possible to stop potential new residents using Scar Bottom Lane as a rat-run between Rochdale rd and Saddleworth rd. The Highways department has already refused planning permission on several occasions because of access and safety issues on Scar Bottom Lane. Currently, there are long traffic queues at the traffic lights in West Vale (at both Saddleworth rd and Rochdale rd junctions) and not just in the morning and at the end of the working day. Road improvements on the A629, A58 and M62 will not help this situation as residents and those from outside the area forced to come through Greetland have to brave West Vale before reaching the improved road systems; indeed the improvements could engender more traffic keen to travel to bigger urban areas. The roads in the villages are single track with no viable prospect of changing to dual carriageway. 600 houses would involve at least 1,200 more vehicles on the roads leading to West Vale. Tinkering with the sequencing of traffic lights isn't going to help. B. It is already possible to smell and taste the air pollution on the approach to West Vale at busy times. A huge increase in the volume of traffic can only have a detrimental effect on the physical and mental well-being of residents. Levels of pollution may be illegal - when was a study last carried out? The Council could already be in contravention of the Clean Air Strategy 2018. C. The schools (primary and secondary) and doctor's surgery are already oversubscribed. There is nothing in the plan to remedy this situation or the fact that regeneration in West Vale has been about restaurants and night-life and not about catering for the every day needs of the vast numbers of prospective new families in the area, were the plan allowed to go ahead. D. On page 24 of your initial Local Plan Vision you commit to -

"ensuring the risks of flooding are significantly reduced." Building houses in Greetland flagrantly contradicts this intent. The lower areas of the proposed sites act as flood plains and uncharted springs and water courses are everywhere on the hillsides. Engineers who dealt with our flooding on Scar Bottom Lane in 2015 (the water from here then flooded properties and land below in Saddleworth rd environs - it has to go somewhere) said it would be very unwise to build on the hillsides or the flood plains as the water course is so unpredictable. Every year in this area, private property and land is flooded, but different people are affected because the course of the water changes. Losing the flood plains would cause a back-up of water further up the hillside and the loss of green land to development would mean more flooding as there would be nothing to absorb it on its journey. Stop press: the most recent flooding on 9/2/2020 clearly demonstrates why taking away Greenbelt land is reckless. We have had localised flooding on Scar Bottom lane for months now. The developers who own the land have failed to mend infrastructure which would have ameliorated the situation so the Council kindly agreed to sub-contract a firm to mend the pipes. The road was dry for a week until Ciara struck and demonstrated how the whole area is vulnerable to flooding.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU476**

Site ref (if applicable): **LP0026**

Person ID: **1242401**

Name: **Mr graeme britteon**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Please read this section of the Consultation Portal in conjunction with the comments I have made in the other two sections as many comments are relevant to all sections available on the Consultation Portal. The Local Plan does not address the implications of the National Planning Policy Framework, especially, NPPF Para 177 and the associated PPG in the Sustainability of Greenbelt Sites. The site assessment for LP0026 shows that out of 17 Sustainability Assessments, the allocation has 10 Uncertain Assessments and 1 Negative Assessment. According to the NPPF Para 143 under 'Proposals affecting the Green Belt' it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' Those very special circumstances simply do not exist and all other more appropriate sites should be included in the Plan before Green Belt sites such as this one. There are no justifiable exceptional circumstances for change of use of this area of Greenbelt land. Although Calderdale Council do recognize some (but by no means all) elements harmful to the Green Belt in their plan, they offer only feeble mitigation against that harm. Calderdale Council need to demonstrate that the Local Plan will enhance those areas where development is proposed and that the development will not negatively affect the existing local communities and the environment in which they live. They have singularly failed to do this. I feel that these plans have not been properly considered and I strongly believe

that they will negatively impact upon the environment and the quality of life in the community for years to come.

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

Sound Reason:

Please read this section of the Consultation Portal in conjunction with the comments I have made in the other two sections as many comments are relevant to all sections available on the Consultation Portal. Calderdale Council is basing its estimate of the future need for houses on out-dated information. As we are no longer members of the EU it should revisit those estimates. I do not not believe that overall requirement for housing will be as great as stated. In reference to this site reference number, LP0026, and sites LP0177, LP1625, and LP0952, there are a number of issues which apply as a result of the scale of proposed development in the Greetland area. There seems to be a grossly disproportionate emphasis that the Plan has upon some communities, particularly Greetland, which are accommodating far in excess of a fair, reasonable and balanced share of development given their relative size. The resulting 'Urban Sprawl' that this plan would create in the Greetland area will have many negative consequences for residents and the environment, such as higher water and air and noise pollution, increased traffic fatalities and congestion, and increased car dependency. The traffic congestion issues, already evident on Saddleworth Road and Stainland Road, do not appear to get any significant recognition in the plan and adding 600 houses at the side of Saddleworth Road will only serve to exacerbate the problems. The potential increase in car journeys in the area will undoubtedly contribute to increased air pollution, particularly effecting vulnerable young children walking to and attending the local school at the side of Saddleworth Road. The existing infrastructure barely meets the needs of the current population of Greetland so increased capacity of schools, dentists, and GP surgeries would be needed to service such a significant increase in the local population. The development of these sites would be against all five functions of Green Belt and, most decisively, would mean the coalescence of Greetland and West Vale and the deterioration of the identity of both places, thus undermining the Council's Settlement Hierarchy. This area of Greetland has an abundance of wildlife due to the natural and undisturbed environment. When walking up the valley I have seen heron, kingfishers, dippers, nut hatches, kestrels, owls, pheasant, and woodpeckers. I have seen foxes, deer, moles, and field mice in the fields above Black Brook and observed brown trout in the brook itself. We have also watched the bats flying around our garden in the late summer evenings. Development here would eradicate a number of species who are reliant upon the Eco system which currently exists here. There are also ecological constraints with regards to Black Brook as it is a UK Biodiversity Action Plan Priority Habitat. In addition, the Woodland Trust has recently supported an application for the donation of over 100 indigenous trees specifically recommended for this area. There are many natural springs on the hillsides above Black Brook which run down through sites LP0026, LP0952, and LP1625, and site LP0177 (a high risk flood area) is partly situated on a natural flood plain. Any development on these sites, which act as a natural and essential soak away, would add to the run off of rain and spring water and would exacerbate potential flood damage further down the valley, into West Vale and beyond. To comply with current legislation on flooding these sites should be removed from the plan. Large open spaces are needed for the mental and physical health and well being of all. Urban sprawl has many negative consequences for residents and the environment. The wooded valley walkway along the side of Black Brook provides a popular area for many of the local residents to enjoy leisure activities (walking, running, cycling etc.) away from the rigors of everyday life and free from traffic and air and noise pollution, yet within walking distance of existing communities. This is an invaluable asset to the community and must be safeguarded from any future development.

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

Duty to Co-operate Reason:

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

Suggested Modifications:

That the 4 sites in the Greetland area (Lp0177, LP1625, LP0026, and LP0952) be removed from the plan.

Comments:

Additional Evidence Link:

Comment ID **HRU496**

Site ref (if applicable):

Person ID: **1140261**

Name: **Mrs Jen Clutterbuck**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

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 **HRU499**

Site ref (if applicable): **LP0026**

Person ID: **1241765**

Name: **Mrs Sandra Britteon**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The plan involves allowing development housing in our Green Belt areas. Areas that have been, and should always be, protected. Protected from the conglomerate developers that seek to destroy our communities, steal our green tranquil spaces, and make profits at all costs. The site assessment for LP0026 shows that out of 17 Sustainability Assessments, the allocation has 10 Uncertain Assessments and 1 Negative Assessment. Under 'Proposals affecting the Green Belt' NPPF Para 143 it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' There are no justifiable exceptional circumstances for change of use of this area of Greenbelt land. Calderdale Council do appear to recognize some harmful elements harmful to the Green Belt in their plan but they offer little in the way of mitigation against that harm. The plan seems to give little value to 'The value of 'Open Space and Recreation' and 'Access to a network of high quality open space' and the Environmental Health section of the Site Assessment Report states that 'There is no significant detrimental effect that cannot be mitigated against'. How can Calderdale Council mitigate against the loss of Greenbelt land, the loss of open spaces and valuable countryside on our doorstep, and the decimation of all the environmental benefits that are provided by them and which are currently enjoyed by your local community? These green spaces are very very important to me and my family and I would hope that they can be valuable to generations to come.

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

Sound Reason:

There are several issues with the soundness of the plan for this site which are also applicable, individually and in total, to all these sites (LP0026, LP0177, LP0952, and LP1625) in the Greetland area: All these sites are marked as Greenfield but should, in truth, be marked as Green Belt sites. All perform strongly against the 5 Green Belt purposes. As such they should be designated as 7th or 8th on the list of suitable sites according to Calderdale Council's own Sustainability Appraisal 2018 document. The land earmarked for housing in the Greetland area falls within the wider Elland region and there is a disproportionate allocation to Greetland than other parts of the Elland region, with Stainland not being allocated any housing at all. There is a significant risk that 'Urban Sprawl' will further nibble away at the surrounding countryside and there will be many negative consequences for residents and the environment, such as higher water, air, and noise pollution, increased traffic fatalities and congestion, and increased car dependency. The traffic congestion is already a major problem at the junction of Saddleworth Road and Stainland Road and at the junction of Rochdale Road and Stainland Road. Recent road works have a major devastating effect on travel times through these two overstretched junctions. Adding 600 houses at the side of Saddleworth Road will only serve to exacerbate these problems. Air pollution is another issue that will be affected by such a large scale addition of houses in a relatively small space along side a single main road. The potential increase in car journeys in the area will undoubtedly contribute to increased air pollution which will particularly effect vulnerable young children walking to the local school at the side of Saddleworth Road. The existing infrastructure struggles to meet the needs of the current population of Greetland so increased capacity of schools, dentists, and GP surgeries would be needed to service such a significant increase in the local population. Sewers are already prone to flooding and overflowing causing further health hazards. The area around these four sites is mainly Grade 3 agricultural land which by Calderdale's own recognition in the Sustainability Report will become an increasingly important commodity in the light of climate change. The Woodland Trust has recently supported an application for the donation of over 100 indigenous trees specifically recommended for this area. The hillsides above Black Brook are riddled with natural springs from the moors which run down through sites LP0026, LP0952, and LP1625, and site LP0177 (a high risk flood area) into Black Brook and to a natural flood plain along side it. Any development on these sites, which act as a natural and essential soak away, would add to the run off of rain and spring water and would exacerbate potential flood damage further down the valley, into West Vale and beyond. To comply with current legislation on flooding these sites should be removed from the plan. Large open

green spaces are required for the mental and physical health and well being of all and Urban sprawl has many negative consequences for residents and the environment. The wooded valley walkway along the side of Black Brook provides a popular area for many of the local residents to enjoy leisure activities (walking, running, cycling etc.) away from the rigors of everyday life and free from traffic and air and noise pollution, yet within walking distance of existing communities. This is an invaluable asset to the community and must be safeguarded from any future development.

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

Duty to Co-operate Reason:

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

Suggested Modifications:

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

Comments:

Additional Evidence Link:

Comment ID **HRU509**

Site ref (if applicable): **LP0026**

Person ID: **956607**

Name: **Mr David Scott**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Please see attached word document.

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

Sound Reason:

Please see attached word document.

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

Duty to Co-operate Reason:

No notice or information given to local residents regarding these sites being re-entered into the Local Plan.

Suggested Modifications:

Please see attached word document.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5604898>

Comment ID **HRU530**

Site ref (if applicable):

Person ID: **1242842**

Name: **Mr Simon Matthews**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

The proposals do not match the spirit, or specific details of paragraphs, of the National Planning Policy Framework. However, I feel unqualified to comment on the legality of the document.

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

Sound Reason:

Green Belt The site LP0026 does not meet the requirements of the five tests for use of Green Belt land NPPF (para 134) or show any exceptional circumstances (para 144) where such building could be allowed, but would not maintain openness and instead contribute to urban sprawl (para 133). This is at odds with government's claim to protect the Green Belt ; as reflected in Esther McVey's suggestion that once Green Belt land is built on, it will be gone, probably forever. NPPF para 145 suggests that new building should be focussed on affordable housing for new-entry purchasers, concentrate on sustainable development and use of brownfield sites wherever possible (para 63), and seek to avoid harm to the openness of the Green belt; however, plans already advertised for local building refer only to 4-6 bedroom luxury houses, not starter homes (as less profit?). Current figures for new housing are built on out-of-date predictions on economic growth in the area; further, if development 18/01189/FUL at West Vale goes ahead to build housing for elderly people, this would free up housing locally so that fewer new houses would be required. Environment and Wildlife NPPF para 174 describes the need to protect enhance biodiversity, habitat and wildlife corridors. This proposed development would do unknown harm to many species ; we regularly see deer, bats, foxes, herons, woodpeckers in the woods by our property, and hear owls most nights, and proposed developments in the area will also lead to loss of mature trees. In addition, the ability to enjoy the environment and walk in green areas is acknowledged to be beneficial to mental & physical health and social well-being (para 8) ; there is a public footpath that runs up the side of this site. Flooding NPPF para 155 states that -"inappropriate development in areas at risk of flooding should be avoided" and that - "development should be safe without increasing the flood risk elsewhere" and also -"to seek to use more sustainable locations where flood risk is likely to be increased" (para 157). When our house was flooded in 2015/16 (on the hill above this site), the council engineer told us at that time there is no comprehensive plan or knowledge of the many springs and steams on the land in this area, and a Yorkshire water engineer said the land should not be built on! We already have issues with run-off every time there is a major storm (this week, the storm run off has shattered our waste water pipe leading to flooding of the bottom of our garden to knee depth) and this water all has to go somewhere. The removal of large areas of grassland reduces the ability of the land so act as a sink for this water as well as leading to an increased risk of flooding to properties and land below us ; part of the the field to be used for LP0026 has visibly suffered

from water damage and becoming waterlogged for much of the last four years. Ironically, the junction of Saddleworth Road and Scar Bottom Lane has needed to be dug up for long periods at least three times in this period due to water mains failure leading to our loss of water supply! Yet the council proposes building on this land and other sites sitting on a flood plain - where will the water go? Given that this problem is, and will be exacerbated, by climate change, how does this constitute making provision to mitigate the effects of climate change and increased flood risks? [unable to load video and photographs of the recent flooding] Air Pollution NPPF para 181 talks about improving Air Quality management plans and Clean Air Zones. Given the likely increase in traffic expected due to potentially over 1000 new cars from the development proposed of 600 new houses, it is difficult to see these as being compatible; nitrogen oxides and particulate emissions are likely to increase, especially due to queues at peak traffic times in West Vale, leading to a decline in air quality in the village, including around the local primary school. Infrastructure NPPF 102 requires consideration of avoidance and mitigation of adverse effects of impact of any changes to transport infrastructure. With the building of 600 new houses along Saddleworth Road, the pressure on West Vale junctions is set to increase by over 100%; currently, a journey yesterday to Elland and back in the early afternoon involved over twenty minutes sat in queues for the traffic lights with Stainland Road. Improvements in the wider area, including a railway station at Elland and new M62 junction, will do nothing to alleviate the local situation in West Vale and will actually exacerbate the problem as many of the people relocating here will have to travel to the local cities for work. The inadequate nature of the local public transport means that the vast majority of commuters have to use private cars for journeys; as there are no local amenities within 500m of most of the new developments, this will also increase local journeys into West Vale (as outside the -"edge of centre"-radius), putting further pressure on parking in the village. The roads adjacent to site LP0026 are very narrow and already heavily used ; I have witnessed accidents due to the lack of space, one involving the local small bus and another with a van. With the introduction of construction traffic, travelling around these roads will become more difficult ; the proposed mini-roundabout is unlikely to have any effect unless the roads can be widened. On top of this, most of Scar Bottom Lane is unadopted and pot-holed, yet still used by some locals to cut through - this will be made a lot worse with the 100 or more additional cars with 67 new houses, not to mention the rest of the developments, as drivers seek to avoid the congestion in West Vale. Lack of capacity in the local schools and health centre/dentist provision is also of great concern to many of the local residents. There is no evidence of increased provision of school places (para 94), or shops close to the new developments. The new developments would lead to a loss of identity in the current village community, as well as a removal of green areas for social recreation. Ironically, residents would have to take more journeys to reach an area for walking or to enjoy wildlife etc.!

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

Duty to Co-operate Reason:

Feel unqualified to comment on this

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU558**

Site ref (if applicable): **LP0026**

Person ID: **1242981**

Name: **Mrs Pamela Watson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Most residents of Greetland are not aware of these proposals. A letter detailing the plans should be sent to each resident. Not everyone has access to internet or able to visit Calderdale offices.

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

Sound Reason:

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

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

Duty to Co-operate Reason:

As above. Most residents of Greetland are not aware of these proposals. A letter detailing the plans should be sent to each resident. Not everyone able to access internet or visit Calderdale offices

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID

HRU567

Site ref (if applicable):

Person ID: **1242988**

Name: **Mr Robin Long**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

As a regular user of roads through West Vale I am well aware of existing problems with capacity. As a user of local medical facilities I am well aware that these are already full to capacity. Whilst I recognise and

accept that new housing is needed I feel that wider considerations such as accessibility/traffic flow and existing support services should be considered and improved where possible before said new housing is undertaken. This does not appear to be the case here.

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

Duty to Co-operate Reason:

I was not aware of these proposed developments until advised by my local MP. As a local resident I would have expected to be contacted by the appropriate authorities before matters reached their current state of progress.

Suggested Modifications:

Substantive improvements to road junctions in West vale.

Comments:

Additional Evidence Link:

Comment ID **HRU574**

Site ref (if applicable): **LP0026**

Person ID: **1242415**

Name: **Mr Christopher Doyle**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Please see comments

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

Sound Reason:

Please see comments

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

Duty to Co-operate Reason:

Objection to proposed developments LP0026 Green Belt Based on NPPF guidelines state councils should retain greenbelt to avoid unrestricted sprawl of large built-up areas and to prevent neighbouring towns merging into one another. Highways Development of sites in Greetland will worsen traffic issues in West Vale. The main problem with traffic in West Vale is the delays at the two sets of traffic lights. Due to queues at the end of Elland Bypass traffic often diverts through Elland into West Vale turning right towards Halifax. With no dedicated right turn lane or filter this causes major delays for Greetland traffic. Traffic will therefore use Saddleworth Road traffic lights and again many will turn right and cause delay and obstruction to traffic wanting to travel to Greetland, Barkisland and Ripponden. Combine this with roadworks, gas mains renewals, drainage works etc and the situation becomes carnage and gridlock. The arrangement causes delays pollution and frustration for all local commuters. Rochdale Road (B6113) and Saddleworth Road (B6114) are main arterial road connecting to Oldham Road (A672) to the west and Huddersfield Road (A629) to the East. These A roads provide access to the M62 corridor and many

thousands of commuters that use the main motorway network daily. In the event of motorway closures which occur several times each year the diverted traffic completely gridlocks the secondary road network which is already full. Future developments need to be centred around public transport and rail networks to minimise the reliance upon cars for people travelling to work. When housing is situated in semi-rural areas there remains no choice but to use a car. Unless the issues are directly addressed by the council by infrastructure improvements such as localised road widening, introduction of right turn lanes, filter lights improvements at junction at end of Calderdale way (Elland Bypass) etc no further major housing developments should be planned within the area. Changing traffic light signals and linking to a control centre will not provide the necessary improvement. Allowing popular drive through burger chains to develop sites without adequate on-site land to safely service customers does not help with congestion at Salterhebble. Stationary traffic on the main road at peak feeding times results. The Site Assessment Report under the section "Potential for Cumulative Impact" simply states "M62 J24" but the complete absence of any reference to the Ainley Top roundabout and current issues at the Motorway Junction and the feeder roads. This shows a complete lack of appreciation of the real local issues. Mitigation that the M62 junctions 20 to 25 are due to be upgraded to smart motorway by 20/21 will not improve issues in West Vale, Salterhebble or Ainley top. The issues at ainley top will only be made worse by introduction of new housing with the inevitable additional commuters to Leeds and other centres of employment. There are queues every day from the main ainley top roundabout trailing back onto the M62 caused by commuters returning home and congestion at ainley top. These trail back down the motorway often for more than a mile. This results in an extremely dangerous motorway with frequent accidents involving cars and wagons an inevitable injuries and fatalities. Further development will only increase the issue. It also results in misery and delays for commuters and pollution. With persistent roadworks for services, maintenance, changes for developments etc, etc. These are never considered and yet they occur on a regular basis. Ainley Top roundabout and all the feeder roads that will take the additional load and this appears to have been totally ignored. Motorway improvements can therefore not be classed as mitigations. Weekdays between the hours of 6.30am to 9.30am, 11.30am to 1.30pm and 3.30pm to 7.00pm, and for long periods throughout both Saturday and Sunday, massive volumes coming from all directions into the Ainley Top roundabout, with long lines of traffic in every direction. Open Space The outcome of this section of the report is stated as -"No Loss/No Impact" Development on this site, combined with plans for development of the field opposite (LP0021) would mean total loss of the current open space! The report also states, "If the site is designated for housing, open space would be required as part of any development", and the council's answer to this has been to remove a tiny section of the field from the housing plans. Housing Services The Site Assessment report states "subject to the Green Belt Review the site "appears suitable for Housing, yet the Green Belt review produced a high score of 4/5 and has still been included for development. The Greenbelt report confirms that development at the site would lead to a -"high potential for urban sprawl" and -"coalescence of towns" In addition, it also states the site -"performs an important role in safeguarding the countryside from encroachment" Environmental Health The area already suffers from considerable traffic noise and the volume of traffic, along with the constant queues of traffic with engines running, mean higher than normal levels of Nitrogen Dioxide already exist. Despite this the plans are to add even more traffic, and some of the new houses could literally be within a few metres from a road that for many hours of every day is subject to standing traffic. How can this possibly make sense in terms of health? Flooding Development on the flood plain is not viable or sustainable. Additional surface run off will inevitably result from tarmac access roads and housing development. Green roofs, permeable driveways, soakaways within gardens may all be put forward as mitigation but there will still be a negative impact upon the runoff into the local streams and watercourses which flow down the valley into the river calder via West Vale. On route there are culverts below roads and rivers flowing through arches below highways that will be affected by the additional water flow and surcharge. Flood plains are already minimising and slowing down the impact upon West Vale. The volumes of water feeding down into West Vale are unprecedented and if any worse flooding of West Vale will occur. Water courses/culverts can easily become blocked and surcharged with debris from upstream. There is already flooding below the railway

bridge on Stainland road and within Heath Rugby Club. Calderdale MBC should not require reminding that Elland Bridge and the former Toll bridge at Copley were both washed away in recent years and took years to reconstruct. Which major part of our infrastructure will be washed away next? Brow Bridge, Culverts below Saddleworth Road, River bridges supporting Stainland Road, Elland Bridge main span etc, etc. Development always results in affects downstream.

Suggested Modifications:

Sites require changing from green belt locations and other brownfield site options exploring. Sites with better transport links are required. The proposals are technically and environmentally flawed. Affordable housing is what is necessary not large expensive developments that just benefit landowners developers, anyone on there payroll.

Comments:

Additional Evidence Link:

Comment ID **HRU579**

Site ref (if applicable): **LP0026**

Person ID: **1121012**

Name: **Mr James Sinclair**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

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

Sound Reason:

Please read this section of the Consultation Portal in conjunction with the comments I have made in the other two sections as many comments are relevant to all sections available on the Consultation Portal. Calderdale Council is basing its estimate of the future need for houses on out-dated information. As we are no longer members of the EU it should revisit those estimates. It is clearly uncertain that the overall requirement for housing will be as great as stated. In reference to this site reference number, LP1625, and sites LP0177, LP0026, and LP0952, there are a number of issues which apply as a result of the scale of proposed development in the Greetland area. There is a grossly disproportionate emphasis that the Plan has upon some communities, particularly Greetland, which are accommodating far in excess of a fair, reasonable and balanced share of development given their relative size. The resulting 'Urban Sprawl' that this plan would create in the Greetland area will have many negative consequences for residents and the environment, such as increased water, air and noise pollution, increased traffic fatalities and congestion, and increased car dependency. The traffic congestion issues, already evident on Saddleworth Road and Stainland Road, do not appear to get any significant recognition in the plan. West Vale is currently at breaking point with the amount of traffic which passes through on a daily basis. West Vale is a vital access route for the valley and surrounding towns and villages and with additional vehicles, a natural bi-product of development, would become dangerously congested. There is no obvious solution to ease the pressures of traffic on West Vale and despite attempts in process of improving the A629 junction, Saddleworth Road and Rochdale Road junctions, it is highly likely that a possible additional 1200 vehicle movements (assuming a 2 car family per household) at peak periods will result in increased congestion and attendant pollution in West vale and surrounding roads. It has also not escaped notice that the proposed modifications to the A629 will result in an additional junction for commuters from West Vale into Halifax to navigate, potentially resulting in even further congestion back into West Vale. WSP Parsons Brinckerhoff Report on Transport Network states that: "£ This report identifies that traffic congestion at the junction of Stainland Road-Saddleworth Road would increase by approximately 105% "£ This report also identifies that traffic congestion at the juncture of Stainland Road-Rochdale Road would increase by over 100% The potential increase in car journeys in the area will undoubtedly contribute to increased air pollution, particularly effecting vulnerable young children walking to and attending the local school at the side of Saddleworth Road. The existing infrastructure barely meets the needs of the current population of Greetland so increased capacity of schools, dentists, and GP surgeries would be needed to service such a significant increase in the local population. There appear to be no mitigating factors to compensate for the increase of 600 properties in the area. At an average of 4.4 people per property, the population increase of 2640 represents a 25% increase in the potential number of patients eligible for treatment in the local Medical Centre, a service which struggles to cope today. The development of thesesites would be against all five functions of Green Belt and, most decisively, would mean the coalescence of Greetland and West Vale and the deterioration of the identity of both places, thus undermining the Council's Settlement Hierarchy. This area of Greetland has an abundance of wildlife due to the natural and undisturbed environment. The valley is home toan extremely healthy and diverse fauna, including heron,kingfishers, dippers, nut hatches, kestrels, owls, pheasant, woodpecker, bats, fox and deer with trout in the brook itself. Development along the riparian habitat would have a severe impact on a number of species who are reliant upon the Eco system which currently exists here. There are also ecological constraints with regards to Black Brook as it is a UK Biodiversity Action Plan Priority Habitat. In addition,the Woodland Trust has recently supportedan applicationforthe donation of over 100 indigenous trees specifically recommended forthis area. There are many natural springs on the hillsides above Black Brook which run down through sites LP0026, LP0952, and LP1625, and site LP0177 (a high-risk flood area) is partly situated on a natural flood plain. Anydevelopment on these sites, which act as a natural and essential soak away, would add to the run-off of rain and spring waterandwould exacerbate potential flood damage further down the valley, into West Vale and beyond. The impact of Storms Ciara and Dennis over the week of 9 th -16 th February

2020 should provide a salutary reminder to Council planners of the danger of continuing housing development on flood plains and associated drainage slopes. To comply with current legislation on flooding these sites should be removed from the plan. Large open spaces are needed for the mental and physical health and well being of all. Urban sprawl has many negative consequences for residents and the environment. The wooded valley walkway along the side of Black Brook provides a popular area for many of the local residents to enjoy leisure activities (walking, running, cycling etc.) away from the rigors of everyday life and free from traffic and air and noise pollution, yet within walking distance of existing communities. This is an invaluable asset to the community and must be safeguarded from any future development.

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

Duty to Co-operate Reason:

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

Suggested Modifications:

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

Comments:

Additional Evidence Link:

Comment ID **HRU584**

Site ref (if applicable): **LP0026**

Person ID: **1128407**

Name: **Mrs Patricia Sinclair**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Please read this section of the Consultation Portal in conjunction with the comments I have made in the other two sections as many comments are relevant to all sections available on the Consultation Portal. Also note that these comments apply equally across applications LP0026, LP0177, LP0952 and LP1625, as taken together they represent a clear and present danger to the health and vitality of the West Vale/Greetland community. The Local Plan does not address the implications of the National Planning Policy Framework, especially, NPPF Para 177 and the associated PPG in the Sustainability of Greenbelt Sites. Site assessments for the 4 proposed development sites in Greetland are overwhelmingly uncertain or negative: LP0026 ; 10 Uncertain Assessments and 1 Negative Assessments. LP0177 ; 9 Uncertain Assessments and 4 Negative Assessments. This site was also refused planning permission in July 2019. LP0952 ; 11 Uncertain Assessments and 2 Negative Assessments LP1625 ; No sustainability assessments! It is inconceivable that given the above, development should be permitted and even more unbelievable that local councillors

should support the adoption of the plan! According to the NPPF Para 143 under 'Proposals affecting the Green Belt' it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' Those very special circumstances simply do not exist and all other more appropriate sites should be included in the Plan before Green Belt sites such as this one. There are no justifiable exceptional circumstances for change of use of this area of Greenbelt land. Although Calderdale Council do recognize some (but by no means all) elements harmful to the Green Belt in their plan, they offer only feeble mitigation against that harm. Calderdale Council need to demonstrate that the Local Plan will enhance those areas where development is proposed and that the development will not negatively affect the existing local communities and the environment in which they live. They have singularly failed to do this. I feel that these plans have not been properly considered and I strongly believe that they will negatively impact upon the environment and the quality of life in the community for years to come.

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

Sound Reason:

Please read this section of the Consultation Portal in conjunction with the comments I have made in the other two sections as many comments are relevant to all sections available on the Consultation Portal. Calderdale Council is basing its estimate of the future need for houses on out-dated information. As we are no longer members of the EU it should revisit those estimates. It is clearly uncertain that the overall requirement for housing will be as great as stated. In reference to this site reference number, LP1625, and sites LP0177, LP0026, and LP0952, there are a number of issues which apply as a result of the scale of proposed development in the Greetland area. There is a grossly disproportionate emphasis that the Plan has upon some communities, particularly Greetland, which are accommodating far in excess of a fair, reasonable and balanced share of development given their relative size. The resulting 'Urban Sprawl' that this plan would create in the Greetland area will have many negative consequences for residents and the environment, such as increased water, air and noise pollution, increased traffic fatalities and congestion, and increased car dependency. The traffic congestion issues, already evident on Saddleworth Road and Stainland Road, do not appear to get any significant recognition in the plan. West Vale is currently at breaking point with the amount of traffic which passes through on a daily basis. West Vale is a vital access route for the valley and surrounding towns and villages and with additional vehicles, a natural bi-product of development, would become dangerously congested. There is no obvious solution to ease the pressures of traffic on West Vale and despite attempts in process of improving the A629 junction, Saddleworth Road and Rochdale Road junctions, it is highly likely that a possible additional 1200 vehicle movements (assuming a 2 car family per household) at peak periods will result in increased congestion and attendant pollution in West vale and surrounding roads. It has also not escaped notice that the proposed modifications to the A629 will result in an additional junction for commuters from West Vale into Halifax to navigate, potentially resulting in even further congestion back into West Vale. WSP Parsons Brinckerhoff Report on Transport Network states that: "Ç This report identifies that traffic congestion at the junction of Stainland Road-Saddleworth Road would increase by approximately 105% "Ç This report also identifies that traffic congestion at the juncture of Stainland Road-Rochdale Road would increase by over 100% The potential increase in car journeys in the area will undoubtedly contribute to increased air pollution, particularly effecting vulnerable young children walking to and attending the local school at the side of Saddleworth Road. The existing infrastructure barely meets the needs of the current population of Greetland so increased capacity of schools, dentists, and GP surgeries would be needed to service such a significant increase in the local population. There appear to be no mitigating factors to compensate for the increase of 600 properties in the area. At an average of 4.4 people per property, the population increase of 2640 represents a 25% increase in the potential number of patients eligible for treatment in the local Medical Centre, a service which struggles to cope today. The development of thesesites would be against all five functions of Green Belt and, most decisively, would mean the coalescence of Greetland and West

Vale and the deterioration of the identity of both places, thus undermining the Council's Settlement Hierarchy. This area of Greetland has an abundance of wildlife due to the natural and undisturbed environment. The valley is home to an extremely healthy and diverse fauna, including heron, kingfishers, dippers, nut hatches, kestrels, owls, pheasant, woodpecker, bats, fox and deer with trout in the brook itself. Development along the riparian habitat would have a severe impact on a number of species who are reliant upon the Eco system which currently exists here. There are also ecological constraints with regards to Black Brook as it is a UK Biodiversity Action Plan Priority Habitat. In addition, the Woodland Trust has recently supported an application for the donation of over 100 indigenous trees specifically recommended for this area. There are many natural springs on the hillsides above Black Brook which run down through sites LP0026, LP0952, and LP1625, and site LP0177 (a high-risk flood area) is partly situated on a natural flood plain. Any development on these sites, which act as a natural and essential soak away, would add to the run-off of rain and spring water and would exacerbate potential flood damage further down the valley, into West Vale and beyond. The impact of Storms Ciara and Dennis over the week of 9th -16th February 2020 should provide a salutary reminder to Council planners of the danger of continuing housing development on flood plains and associated drainage slopes. To comply with current legislation on flooding these sites should be removed from the plan. Large open spaces are needed for the mental and physical health and well being of all. Urban sprawl has many negative consequences for residents and the environment. The wooded valley walkway along the side of Black Brook provides a popular area for many of the local residents to enjoy leisure activities (walking, running, cycling etc.) away from the rigors of everyday life and free from traffic and air and noise pollution, yet within walking distance of existing communities. This is an invaluable asset to the community and must be safeguarded from any future development.

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

Duty to Co-operate Reason:

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

Suggested Modifications:

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

Comments:

Additional Evidence Link:

Comment ID **HRU588**

Site ref (if applicable): **LP0026**

Person ID: **1243007**

Name: **Mr Lee Thorpe**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

No 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 to be open and transparent and this has not been the case. Calderdale Council in updating the plan to include this site have not taken into the implications that it will cause. Paragraph 177 of the National Planning Policy Framework (NPPF) and the PPG in the Sustainability of Greenbelt sites. This site is home to many protected species including Great Crested Newts, bats, owls, woodpeckers and hedgehogs. The wildlife & Countryside Act 1981, The Conservation Regulations 1994 and the Countryside & Rights of Way Act 2000 are all being contravened by including this site back into the Local Plan for development. Although the Calderdale Council's Planning Officer recently stated that they had saved much Greenbelt, the fact is they have proposed to build on even more Green belt in Greetland than previous agreed in the Local Plan. Indeed the inclusion of sites in Greetland including site LP0026 is the majority of Greetland's existing Green belt. The 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." This site is at the beginning of the green belt in Greetland to the North side is a wildlife corridor and acts as a buffer against urban sprawl that stops Greetland merging into Barkisland. Para 80 of the NPPF CMBC has already stated that -"The site 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" The Council in its own evidence concluded that this site is located and performs strongly when assessed against the five green belt purposes. Therefore by definition development of this site would be inappropriate and would be harmful to the existing green belt. No special/exceptional circumstances have been demonstrated to outweigh the harm that would be caused by development and therefore this proposal is contrary to Section 13 (Protecting Green belt Land). The site report advises that of the 17 x Sustainability Assessments, this site has 10 x Uncertain Assessments and 1x Negative Assessment.

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

Sound Reason:

For the following reasons Flooding The Calder valley is in a recognised high risk flood area, and this site is prone to flooding and although it sits on the side of a valley and slopes, it does capture the water coming off the top of the hill including Norland Moor, consequently it very quickly becomes boggy, Photos attached. The drains along Saddleworth Road are already not fit for purpose with numerous leaks and serious water bursts/fountains reported in 2019 that involved parts of Saddleworth Road being closed off completely for months at a time. Development of this site will only cause the water to run further and faster downhill onto a site which is also being proposed for development LP0952. Without these two sites the water is going to run straight into the river and cause more flooding downstream with associated flooding to West Vale and Elland. Wildlife Any development would also cause harm to the root system of the Protected trees that line the North and North West side of the site and any felling of branches to accommodate houses could leave the trees open to infection as has been seen at the top of the field when recently 3 mature protected trees had to be felled due to disease. The existing protected trees left on this site are home to insects, bats and owls to name but a few. The field itself not only acts as a sponge for excess rain water but also as a carbon sink improving local air quality. Noise pollution from the homes being proposed plus the increase traffic using Saddleworth Rd and Scar Bottom Lane will also disrupt wildlife. Air Pollution/Congestion LP0026 is on Saddleworth Road, as are ALL the other proposed sites in Greetland. This is where our Green belt is and it has done its job in mitigating the noise and air pollution caused from the traffic on his very busy road. Saddleworth Road is used by a large recycling and chemical plant at the bottom of the valley. The heavy haulage transport required for these businesses in conjunction with the current home owners commuting to work causes the junction with West Vale to be incredibly

busy from 6.30am onwards. 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 will not prevent West Vale from being choked by additional commuters as a direct result of this planning proposal WEST VALE IS ALREADY SUFFERING. More bus stops and a train station proposed in Elland will not remedy this congestion. 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% As West Vales lies at the bottom of the valley this will increase air pollution to health damaging levels, taking into consideration the 2 Schools in close proximity to the junction the impact to health will be severe. It must also be taken into consideration that majority of the roads in the ward are very narrow. Scar Bottom Lane and Brian Royd that surround the site being case in point. Only very small buses can travel on these roads. Putting more buses on will just increase air pollution and add to the congestion. Although the close proximity of the M62 could be seen as a bonus for the site it is difficult to access due to the current and what will become an increased bottle neck of West Vale. Accordingly a recent Highways Report previously submitted already recommended against any further development in this area for these very same reasons. Impact on Greetland Village Greetland is a village it is not a town. It is not connected to Elland or Stainland. The proposed number of houses along Saddleworth Road (1 single Road) is going increase the number of properties in the village of Greetland by at least 20%. This is not sustainable nor is it proportionate with the number of houses proposed for other areas. The proposed development IS urban sprawl which is against what is recommended in the National Planning Policy Framework (NPPF). Indeed the Councils own Greenbelt survey for site LP0026 indentified a 'High potential for unrestricted sprawl' and that its current state 'Performs an important role in safeguarding the countryside from encroachment'. Infrastructure Both schools in Greetland are full. Our local dentists have waiting lists in the hundreds for NHS patients. GP surgeries in the area are not taking on new patients not to mention how the increased numbers in the area would affect the hospitals. The water main and drains that run along Saddleworth Road are over 60 years old and need replacing, already unable to cope with the strain leading to several road closures on Saddleworth Road last year. With regards to this site, the proposed entrance is onto Saddleworth Rd near the cross roads of Scar Bottom Lane and Gate Head Lane. This stretch of road has cars which exceed the speed limit on a regular basis, and as such it is a dangerous stretch of road that has seen a fatality. The proposal to put a mini roundabout at the crossroad/junction will do little to address this situation. Having the opening out from the site onto Saddleworth Rd will not only be dangerous but will also increase water runoff onto Saddleworth Rd that could be dangerous in heavy rainfall. We already have brownfield sites in the village and in surrounding areas that are not in the local plan that could be considered as alternatives to this site. Building on site LP0026 would not preserve the openness of the greenbelt on this side of Saddleworth Rd, in view that site LP1407 to the north of site LP0026 was included in the Local Plan only last year as a concession for the rest of Greetland's Greenbelt being removed. Proposed houses on both of these sites, separate by the very narrow Brian Royd Lane will destroy the openness of the area and compound the Urban sprawl of Greetland. No special circumstances for building on this site have been demonstrated by the Council, as there should be according to the NPPF. With Climate Change we need our Greenbelt/Greenfields more than ever. For this area due to the unique topography and the fact that we are in a valley, these fields are our only Defence against flooding which is predicted to get worse by up to 70% in the next 50 years. Building here and on the other proposed Saddleworth Rd sites will pose a future risk to Property and the local economy as it would increase surface water runoff into the river which will flood existing homes and businesses, yet no plan's have been proposed to mitigated against this.

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

Duty to Co-operate Reason:

It does not conform to Government Policy, nor does it conform with current legislation with regards to building on the Greenbelt or on flood risk areas. It is not the role of the Council to release unacceptable

sites within the Greenbelt to meet a housing target. The inspector's letter 16/07/19 notes at (Para 14) that 'Local Plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits'. The Council have not reviewed the supply of more suitable and available sites elsewhere as the additional sites are simply not suitable in the terms of the NPPF and current legislation. Also Developers should not be setting policy by dictating what kind of housing is build where, this is for the Council to determine. I therefore feel that the current amended Local Plan for Greetland which includes this site LP0026 is not fit for purpose and should be redrafted with the removal of this site post haste along with all other proposed sites along Saddleworth Road.

Suggested Modifications:

As advised above

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5606071>

Comment ID **HRU589**

Site ref (if applicable): **LP0026**

Person ID: **1243007**

Name: **Mr Lee Thorpe**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

No 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 to be open and transparent and this has not been the case. Calderdale Council in updating the plan to include this site have not taken into the implications that it will cause. Paragraph 177 of the National Planning Policy Framework (NPPF) and the PPG in the Sustainability of Greenbelt sites. This site is home to many protected species including Great Crested Newts, bats, owls, woodpeckers and hedgehogs. The wildlife & Countryside Act 1981, The Conservation Regulations 1994 and the Countryside & Rights of Way Act 2000 are all being contravened by including this site back into the Local Plan for development. Although the Calderdale Council's Planning Officer recently stated that they had saved much Greenbelt, the fact is they have proposed to build on even more Green belt in Greetland than previous agreed in the Local Plan. Indeed the inclusion of sites in Greetland including site LP0026 is the majority of Greetland's existing Green belt. The 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." This site is at the beginning of the green belt in Greetland to the North side is a wildlife corridor and acts as a buffer against urban sprawl that stops Greetland merging into Barkisland. Para 80 of the NPPF CMBC has already stated that -"The site 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" The Council in its own evidence concluded that this site is located and performs strongly when assessed against the five green belt purposes. Therefore by definition development of this site would be inappropriate and would be harmful to the existing green belt. No special/exceptional circumstances have been demonstrated to outweigh the harm that would be caused by development and therefore this proposal is contrary to Section 13 (Protecting Green belt Land). The site report advises that of the 17 x Sustainability Assessments, this site has 10 x Uncertain Assessments and 1x Negative Assessment.

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

Sound Reason:

For the following reasons Flooding The Calder valley is in a recognised high risk flood area, and this site is prone to flooding and although it sits on the side of a valley and slopes, it does capture the water coming off the top of the hill including Norland Moor, consequently it very quickly becomes boggy, Photos attached. The drains along Saddleworth Road are already not fit for purpose with numerous leaks and serious water bursts/fountains reported in 2019 that involved parts of Saddleworth Road being closed off completely for months at a time. Development of this site will only cause the water to run further and faster downhill onto a site which is also being proposed for development LP0952. Without these two sites the water is going to run straight into the river and cause more flooding downstream with associated flooding to West Vale and Elland. Wildlife Any development would also cause harm to the root system of the Protected trees that line the North and North West side of the site and any felling of branches to accommodate houses could leave the trees open to infection as has been seen at the top of the field when recently 3 mature protected trees had to be felled due to disease. The existing protected trees left on this site are home to insects, bats and owls to name but a few. The field itself not only acts as a sponge for excess rain water but also as a carbon sink improving local air quality. Noise pollution from the homes being proposed plus the increase traffic using Saddleworth Rd and Scar Bottom Lane will also disrupt wildlife. Air Pollution/Congestion LP0026 is on Saddleworth Road, as are ALL the other proposed sites in Greetland. This is where our Green belt is and it has done its job in mitigating the noise and air pollution caused from the traffic on his very busy road. Saddleworth Road is used by a large recycling and chemical plant at the bottom of the valley. The heavy haulage transport required for these businesses in conjunction with the current home owners commuting to work causes the junction with West Vale to be incredibly busy from 6.30am onwards. 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 will not prevent West Vale from being choked by additional commuters as a direct result of this planning proposal WEST VALE IS ALREADY SUFFERING. More bus stops and a train station proposed in Elland will not remedy this congestion. 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% As West Vales lies at the bottom of the valley this will increase air pollution to health damaging levels, taking into consideration the 2 Schools in close proximity to the junction the impact to health will be severe. It must also be taken into consideration that majority of the roads in the ward are very narrow. Scar Bottom Lane and Brian Royd that surround the site being case in point. Only very small buses can travel on these roads. Putting more buses on will just increase air pollution and add to the congestion. Although the close proximity of the M62 could be seen as a bonus for the site it is difficult to access due to the current and what will become an increased bottle neck of West Vale. Accordingly a recent Highways Report previously submitted already recommended against any further development in this area for these very same reasons. Impact on Greetland Village Greetland is a village it is not a town. It is not connected to Elland or Stainland. The proposed number of houses along Saddleworth Road (1 single Road) is going increase the number of properties in the village of Greetland by at least 20%. This is not sustainable nor is it proportionate with the number of houses proposed for other areas. The proposed development IS urban sprawl which is against what is recommended in the National Planning Policy Framework (NPPF). Indeed the Councils own Greenbelt survey for site LP0026 indentified a 'High potential for unrestricted sprawl' and that its current state 'Performs an important role in safeguarding the countryside from encroachment'. Infrastructure Both schools in Greetland are full. Our local dentists have waiting lists in the hundreds for NHS patients. GP surgeries in the area are not taking on new patients not to mention how the increased numbers in the area would affect the hospitals. The water main and drains that run along Saddleworth Road are over 60 years old and need replacing, already unable to cope with the strain leading to several road closures on Saddleworth Road last year. With regards to this site, the proposed entrance is onto Saddleworth Rd near the cross roads of Scar Bottom Lane and Gate Head Lane. This stretch of road has

cars which exceed the speed limit on a regular basis, and as such it is a dangerous stretch of road that has seen a fatality. The proposal to put a mini roundabout at the crossroad/junction will do little to address this situation. Having the opening out from the site onto Saddleworth Rd will not only be dangerous but will also increase water runoff onto Saddleworth Rd that could be dangerous in heavy rainfall. We already have brownfield sites in the village and in surrounding areas that are not in the local plan that could be considered as alternatives to this site. Building on site LP0026 would not preserve the openness of the greenbelt on this side of Saddleworth Rd, in view that site LP1407 to the north of site LP0026 was included in the Local Plan only last year as a concession for the rest of Greetland's Greenbelt being removed. Proposed houses on both of these sites, separate by the very narrow Brian Royd Lane will destroy the openness of the area and compound the Urban sprawl of Greetland. No special circumstances for building on this site have been demonstrated by the Council, as there should be according to the NPPF. With Climate Change we need our Greenbelt/Greenfields more than ever. For this area due to the unique topography and the fact that we are in a valley, these fields are our only Defence against flooding which is predicted to get worse by up to 70% in the next 50 years. Building here and on the other proposed Saddleworth Rd sites will pose a future risk to Property and the local economy as it would increase surface water runoff into the river which will flood existing homes and businesses, yet no plan's have been proposed to mitigated against this.

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

Duty to Co-operate Reason:

It does not conform to Government Policy, nor does it conform with current legislation with regards to building on the Greenbelt or on flood risk areas. It is not the role of the Council to release unacceptable sites within the Greenbelt to meet a housing target. The inspector's letter 16/07/19 notes at (Para 14) that 'Local Plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrable outweigh the benefits'. The Council have not reviewed the supply of more suitable and available sites elsewhere as the additional sites are simply not suitable in the terms of the NPPF and current legislation. Also Developers should not be setting policy by dictating what kind of housing is build where, this is for the Council to determine. I therefore feel that the current amended Local Plan for Greetland which includes this site LP0026 is not fit for purpose and should be redrafted with the removal of this site post haste along with all other proposed sites along Saddleworth Road.

Suggested Modifications:

As advised above

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5606073>

Comment ID **HRU601**

Site ref (if applicable): **LP0026**

Person ID: **1243001**

Name: **MR David Farrar**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

See comments below.

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

Sound Reason:

I object to the Local Plan Site Ref LP0177, LP0952, LP1625, LP0026 for the following reasons: Loss of highly Sensitive Green Belt Increased Traffic Congestion Increased Air pollution Increased Flooding to sewers and rivers Loss of -"Highly Sensitive Green Belt" NPPF Section 13 Protecting Green Belt Land Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: 1) to check the unrestricted sprawl of large built-up areas (2) to prevent neighbouring towns merging into one another (3) to assist in safeguarding the countryside from encroachment (4) to preserve the setting and special character of historic towns (5) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Calderdale Council, in its own evidence, concludes that this area of Green Belt performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt. Esther McVey's (former Housing Minister up to Nov 2019) written policy on Green Belt land quotes: "protecting the Green Belt goes beyond protection against development" -"My department is working with DEFRA (Department of Environment, Food & Rural Affairs) and Natural England on the once-in-a-generation Environment Bill which will establish a comprehensive legal framework for environmental improvement and make net gains for biodiversity mandatory for new development. Of course one of the most important environmental safeguards we have is the Green Belt. And I want to be clear that our commitment to this is as strong as ever, with any changes only happening in exceptional circumstances ; protecting the Green Belt goes beyond protection against development" Exceptional circumstances in The Government White Paper -"Fixing our Broken Housing Market" Parag 1.39 states that: -"The Government wants to retain the high bar to ensure the Green Belt remains protected, but we also wish to be transparent about what this means in practice so that local communities can hold their councils to account therefore we propose to amend and add to the National Policy to make it clear that: authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including making effective use of suitable brownfield sites and the opportunities offered by state regeneration: Do Calderdale Council have the evidence that they have done this? Brownfield sites have been removed from the plan because developers do not want to develop these sites as their profits are not as high. This is not a good reason for destroying highly sensitive green belt and does not constitute exceptional circumstances. There are brownfield sites within Calderdale that could be developed to provide the necessary housing demand and should be developed first before destroying green belt for ever. Changes to Economic Relationships The Local Plan was drawn up between 2016 and 2018, with amendments made in October 2019. The plan was based on housing requirement to support the economic growth plan. This country has just seen its biggest change in 47 years as we have now left the EU. The housing projection used in the Local Plan must no longer be valid due to the significant change in UK's relationship with the EU. Reduced immigration will lead to a reduction in the amount of new housing required and therefore reduce the need to release Green Belt. It must be reviewed prior to acceptance of the plan as the housing need will be significantly smaller post Brexit. Increased Traffic Congestion Saddleworth Road\Stainland Road Junction. The 4 sites proposed on Saddleworth Road will more than double the number of vehicles coming down Saddleworth Road. There has been chronic congestion at the 2 traffic light junctions in nearby West Vale for a number of years now. This crossroad junction carries traffic from Greetland, Barkisland and Ripponden, traffic to and from Elland and Junction 24 of the M62, and all traffic travelling between Halifax and the villages beyond the Outlane area of Huddersfield and Junction 23 of the M62. This junction is dangerous and congested throughout the day, especially since a Cooperative store was sited in the middle of the Saddleworth Road/Stainland Road traffic light junction about 4 years ago. Vehicles including buses and trucks fight over the space at both junctions in West Vale and often selfishly push their way through when the lights are red, in turn putting other road users and pedestrians at risk of harm. The flow of slow moving vehicles is constant and air pollution here has increased as a consequence. It has been stated that this can be resolved by changing the setting on the

traffic lights, but this cannot ease the congestion if additional capacity is not provided on the roads out of the junction towards Elland or Halifax. The multimillion pound works at Salterhebble will only make the congestion worse in West Vale as it makes the queueing area between Salterhebble mini roundabout and West Vale smaller, therefore the traffic will back up into the West Vale traffic lights area making the situation worse. The local roads are incapable of taking any additional traffic. Calderdale Council are proposing to allow 600 plus properties to be built on Saddleworth Road thus adding to the chronic issues which already exist.

Increased Air Pollution The primary goal of the Clean Air Act is, -“to achieve national ambient air quality levels protective of public health and welfare by establishing air quality standards and imposing limitations on air pollutant emissions from both stationary and mobile sources” The doubling of the number of vehicles (due to the proposed housing developments) using and sitting in traffic queues on the lower part of Saddleworth Road will impact negatively on the air quality in the area. There is an infant school and pre school located between 2 of the proposed large housing sites on Saddleworth Road. Traffic around the school is already a major safety issue and the road around the school is a bottleneck twice a day. Increased emissions from the standing traffic will affect the children and families using the school and those living near the school. Air quality standards will be compromised. The centre of West Vale probably has poor air quality already. Let's not add to it for the sake of our health. Clean air is crucial for our health and well being, and Greetland is a community continually trying to create a better and healthier environment for the benefit of everyone. Money has been obtained from the Woodland Trust and a large number of trees have already been planted in the area and more are planned. This is being undertaken in order to maintain good air quality and to help preserve the habitat for the wildlife corridor here. Massive house building in the area will negate these actions.

Flooding Immediate Area On the last Local Plan these sites were graded as a Class 1 Severe Risk Flood Area and were removed; in compliance with current legislation they should not have been put back into the amended Local Plan in October 2019. The area to the rear of Woodfield Drive next to the brook, part of the development site LP0177, flooded very badly on Boxing Day 2015 and again 8th/9th February 2020 and again 14th/15th February . Residents have already posted images of the flooding in this Portal for reference. The current planned development in along Saddleworth Road will increase greatly the peak flows and volumes runoff from the fields and therefore the risk of flooding. Developers use Sustainable Urban Drainage techniques to slow this flow down, but the clay soil in this area make this technique unsuitable. The alternative is large storage areas either above or below ground. These techniques will reduce peak flows and slow the flows down but they do not reduced the volume of runoff that will be more than double the greenfield runoff, thus making the flooding to the rivers worse in the immediate vicinity and West Vale. Current policy and legislation on flooding states "due to every increasing wide-scale flooding incidents in the country and the ever increasing threat of climate change new development in a flood area that increases the risk of flooding in the development's community or elsewhere is not permitted". Calderdale Council Planning Department has a duty of care to comply with current policy and legislation on flooding. Housing should not be built on sites such as this.

Wider Catchment Issues The Black Brook flows through West Vale and discharges into the river Calder in Elland. In 2015 and 2020 major flooding has occurred on the River Calder at Todmorden, Hebden Bridge, Mytholmroyd, Sowerby Bridge, West Vale, Elland and Brighouse. The proposed development along Saddleworth Road as stated above will double the volume of water into the black brook further increasing the risk of flooding at very sensitive flood site downstream in Elland and Brighouse. If the land is no longer needed for farming, it would be better used to contribute to reducing the wider catchment flooding issues by planting trees which will reduce runoff and also enhance the wildlife corridor.

Sewer Flooding The sewers that runs close in the Black Brook and down Saddleworth Road are already overloaded with combined sewer overflows (CSO) that discharge excess flows into the brook at time of rainfall. The proposed developments will more than double the number of houses connected to these sewer systems. These additional foul flows will almost double the flood volumes on the sewers and and nearly double the annual spill volumes from the CSOs which will increase the pollution to the brook. This will have a negative impact on the fish and wildlife in the area. The Environment Agency have a no deterioration policy for CSOs but there are currently no plans to upgrade the sewer system in Greetland and West Vale to negate this

impact.

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

Duty to Co-operate Reason:

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

Suggested Modifications:

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

Comments:

Additional Evidence Link:

Comment ID **HRU604**

Site ref (if applicable): **LP0026**

Person ID: **1243009**

Name: **Mr Martin Worsick**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

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

Sound Reason:

Green open spaces are very important to our health and well being and we have chosen to live in a rural area exactly for those reasons. Urban sprawl is in danger of encroaching on our local green spaces and removing precious green belt land and corridors which host a wide variety of flora and fauna. We have seen deer, pheasants, owls, bats, and a wide variety of birds. Black Brook has brown trout and possibly even otters. In Calderdale's own Sustainability Appraisal in 2018 the sites were recognised as being grade 3 agricultural land and as being a valuable commodity for the future especially due to climate change. As mentioned above there is a serious risk of flooding which would only be exacerbated by any housing built on the fields identified in sites LP0026, LP0177, LP1625, and LP0952 which would remove valuable soak

away areas. Again looking at the 4 proposed sites mentioned above, and the high number of proposed houses (600) at the side of Saddleworth Road there would be a massively significant increase in traffic on this road leading to even more issues at the already congested junctions of Saddleworth Road and Stainland Road and Stainland Road and Rochdale Road in West Vale. The early morning and school time traffic queues stack back almost to the school on Saddleworth Road at the moment so additional traffic would undoubtedly increase air and noise pollution particularly in the area around the school where especially vulnerable young children walk to school. Rat runs may also be created between the main arterial routes as drivers seek to avoid the worst congestion. The local infrastructure is already stretched with schools, doctors, and dentists in the area struggling to meet the needs of the local community. This is an area with a high car ownership and public transport in the area is poor and infrequent with only limited services to serve the community.

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

Duty to Co-operate Reason:

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

Suggested Modifications:

This plot should be taken out of the plan.

Comments:

Additional Evidence Link:

Comment ID **HRU609**

Site ref (if applicable): **LP0026**

Person ID: **1242514** Name: **MRS Christine Beaumont** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

I would like to object to the proposed local plan for Greetland. First of all point out that Greetland is in Halifax and not Elland (my address Greetland, Halifax, West Yorkshire NOT Greetland, Elland, Calderdale). I have been a resident in the village of Greetland for over 35 years. Within these years I have seen several housing developments built. First of all the Goldfield Estate. A very large housing development. This was built on an area of green space and took away a play area for children and recreational use for adults. It also took away a natural habitat for wildlife. The 2nd estate to be built was the Bankfield Estate. Again another large estate. Which took away a play and recreational area and also wildlife habitat. One of those being a very large pond fed by local springs where newts, frogs and dragon flies could be found. It was a regular place for families to visit. In addition to these there have been several smaller developments. The developments over the last 35 years has resulted in the village doubling in size. The school, which only had one class per year when my own children attended, now has 2 classes per school year. I understand the

capacity of the school is 420 and the school is FULL. Objection Flooding - 2015 & 2020 The Greenbelt land proposed for building is prone to flooding. In 2015 there was significant flooding to the fields in question. Prior to this date there were defined paths from West Vale, along Black Brook, to Gate Head Lane. After the floods these disappeared. The ground fractured in some of the areas. The water was contained by these fields. As far as I am aware, there wasn't any damage to properties in the surrounding area. However, further down the valley, towards Elland, buildings, a bridge and other properties sustained significant damage. The bridge collapsed. Where is the water to go if the fields are built on? Will the properties in lower Greetland/West Vale be the next area to experience flooding? Are they going to suffer in the same way as those in Hebden Bridge? Since writing this, there has been further significant flooding to the area. On 8th and 9th February 2020 the land on all of the local plans for Greetland was flooded. Several images/videos can be found on the Greetland Pressure Group facebook page. In addition to these areas significant flooding occurred on Stainland Road, the fields off Stainland Road, Elland, Brighouse and the Calder Valley. Stainland Road travels through West Vale (lower Greetland).

Infrastructure - Education, Health, Highways. Highways If the building work was allowed to be carried out there would be noise, dust, mud. Constant and increased traffic on both Saddleworth Road and Rochdale Road. Vehicles (trying to avoid building contractors and queues on Saddleworth Road) taking the narrow roads up to Rochdale Road to enable them to take that road into West Vale. The roads in this area cannot cope with any increase in traffic. A journey down to West Vale (on both roads) at peak time in a morning can take up to 25 minutes at the moment. This journey time will increase considerably if the number of dwellings proposed were to be allowed. As a result of standing traffic there would be a significant increase in air pollution. It is obvious even now when you walk down the hill from Greetland to West Vale. Air pollution is particularly bad in West Vale at peak times. This is only going to get worse with the extra vehicles both from the new estates and the building contractors. Saddleworth Road or Rochdale Road have to be taken if you intend to travel in the direction of Halifax or Huddersfield or join the M62. There is no alternative. All roads lead to West Vale and no recalibration of the traffic light timing sequence at the junctions will ease the present congestion or future increased traffic. The routes our children take to walk between their respective schools are the same ones that will attract the increased traffic and resultant air pollution. What effect will this air pollution have on our community's health? The effect this would have on our children (and adults) would be catastrophic. (increase in respiratory problems?) This is an area where, at the moment, you can still leave your car at home and walk. Surely the health of our community should be our priority. Don't take our countryside away. We need it. Our future generations need it!

Infrastructure - Schools The Greetland School is sited on Saddleworth Road and School Street (off Rochdale Road). Greetland School is run over 2 sites. Years 1 & 2 at the Sunnybank Annex. The Sunnybank Annex and pre-school, are in the area where one the largest of the proposed dwellings on the local plan are to be built (LP0177 - 200 houses). The construction of this development, and the others higher up Saddleworth Road, will result in increased air pollution, noise, dirt etc which can only have a detrimental effect on everyone's health. The previous developments resulted in the local schools having to significantly increase class sizes and the number of classes. As the schools are at capacity now, how are they expected to accommodate the children of new families to the area? What effect will it have on existing families being able to get their children into their local school? There would be an increase in traffic at school drop off and pick up times. This is already an issue. Any increase in traffic would only serve to put lives at risk. For a child, walking to school is part of growing up. It is a way of socialising, exercising, learning to deal with traffic, gaining independence etc. Let's make it safe.

Infrastructure - Health Additional housing in the area would need our local GP surgeries and dental practices to be expanded. Already there is a shortage of doctors and NHS dentists and this has been the case for some time. This is not going to change. These services are a necessity of life and therefore the lack of them cannot be ignored. This week we have seen the closure of 5 surgeries in Calderdale and patients placed with other, existing, GP surgeries. This extra burden on GP'S cannot continue. We will end up losing General Practice Doctors not attracting them to the area. Extract from the Halifax Courier 21.1.2020. "The Sowerby Bridge, Ovenden and Elland, sites currently operated by Virgin Care LLP (Meadow Dale Group Practice) will close and the CCG will register patients with an alternative

practice". Children (and adults) need exercise. Need to be outside in the fresh air. Need to socialise outside of the home. Extract from the minutes taken at the meeting of the Calderdale Health and Wellbeing Board dated 8th August 2019. "There were a number of recent examples of work within the community which had provided benefits for residents of Calderdale. Examples were provided by Officers in regards to 'harnessing the power of communities', one which involved a walk in the hills with young people, who experienced a different kind of engagement to get away from the notion of the same kinds of activity relating to exercise (e.g. gym, swimming etc.), which positively impacted their health as well as their mental health and emotional wellbeing". How can Calderdale, and the Government agencies, propose building on Greenbelt land and removing what they obviously see as a benefit to their communities health, mental health and emotional wellbeing. Extract from News Centre - Latest News from Calderdale Council(<http://news.calderdale.gov.uk/helping-young-children-to-stay-active>) Posted 27.9.2019. Gemma Mann, Children's Health and Wellbeing Lead at Public Health England, said: -"It's really important that all children get the necessary daily physical activity they need to stay healthy, the benefits for children are well evidenced. Moving more helps young children to develop motor skills, improves cognitive development, helps them maintain a healthy weight, enhances bone and muscular development and supports the learning of social skills." Cllr Faisal Shoukat, Calderdale Council's Cabinet Member for Public Health and Cohesion, said: -"We want all children in Calderdale to have the best start in life. An important part of this is to be physically active from an early age". Don't take our countryside away. We need it. Our future generations need it! Ecology I have reviewed the comments made by Mr Mark Jones of David Wilson Homes. Please explain how reducing a 10HA area of naturally occurring greenbelt/wildlife corridor down to 3.38HA of man-made wildlife corridor can produce "an enhanced biodiversity/recreation corridor". Surely, the greenbelt land as it is, currently sustains a greater and more diverse naturally occurring ecological system than any man-made corridor could ever create. I've also noted Mr Jones comments on the expansion of the school. Another building contract for them! Once again, the big contractors, government and local councils, are attempting to take away school playing fields. Consequently the loss of Physical Education facilities and recreational spaces can only result in even more unhealthy children. How does that sit with "The Councils health and anti-obesity campaign?". I would also question whether Mr Mark Jones ever visited the area in compiling his report. I would also refer to the Housing Minister Esther McVey's speech on the updated National Planning Policy Framework: setting out the government's planning policies for England and how they should be applied. (16.10.2019 published 16.1.2020). "Protecting the environment for future generations" "The revised NPPF also takes a long view; recognising the role that smart planning and good design plays to not just protect, but enhance, our environment and tackle climate change. As such, it asks local authorities to seek net gains for biodiversity when granting planning permissions. It encourages the provision of green infrastructure, recognises the important status of Local Wildlife Sites, ancient and veteran trees and woodland and prevents unacceptable development in National Parks and Areas of Outstanding National Beauty. But we know we have to do more. Which is why my department is working with Defra (Department for Environment, Food & Rural Affairs) and Natural England on the once-in-a-generation Environment Bill which will establish a comprehensive legal framework for environmental improvement and make net gains for biodiversity mandatory for new development. Of course, one of the important environmental safeguards we have is the Green Belt. And I want to be clear that our commitment to this is as strong as ever, with any changes only happening in exceptional circumstances - and, even then, development only being able to go ahead with improvements to access and environmental quality in the remaining Green Belt. Protecting the Green Belt goes beyond protection against development" There is no improvement to access or environmental quality in the remaining Greenbelt. By proceeding with the developments proposed for the Greetland area you are removing a substantial amount of our Greenbelt. As such you are failing to comply with the government ministers instructions. Extract from the Independent 5.12.2019 17.08 pm <https://www.independent.co.uk/news/uk/politics/boris-johnson-housing-build-construction-flood-plains-derbyshire-election-a9234456.html> Boris Johnson has thrown housebuilding plans into confusion, by suddenly calling for an end to construction on flood plains. Around 9 per cent of new homes in England are

built on land where there is a -"high probability" of flooding "" and a recent investigation found that 10,000 are currently in the pipeline. But, on the campaign trail in flood-hit Derbyshire, the prime minister said: -"We've got to stop building on flood plains. We've got to stop building on areas which are vulnerable to flooding." And we now turn to Calderdale Authority. The following link is to a survey sent out by Calderdale Council to the local community. The survey was received on Thursday 6th February, 2020, just before the extensive flooding that occurred on 8th and 9th February 2020. This survey refers to the Climate Emergency. <https://www.calderdale.gov.uk/survey/climate-emergency-2020/?id=fmB2n> Extracts from the survey: " Pollution from fossil fuel vehicles causes asthma in our towns, and worsens the health of those with heart or lung problems. Traffic noise is a nuisance for many communities, and fast moving vehicles pose dangers - especially for children. Many people sit down in their car to drive to work and then spend all day sat in an office. This physical inactivity is bad for our health". Land and Biodiversity "Biodiversity is at severe threat from climate change such as a loss of species and habitats. Land use may need to change drastically in the future to meet climate change targets before the damaging effects are irreversible. Going back in history, much of the UK's land mass was covered in trees. There were also huge areas of bog and marsh. People used the trees as a natural resource as a fuel and to build ships. Bogs and marshes were drained for food production. From a climate change perspective Calderdale alongside the rest of the South Pennine landscape was subjected to 200 years of the worst atmospheric pollution the UK has ever seen from past industrial activity. This has decimated the uplands of Calderdale to a carbon source from degraded peatland, with poor fire resilience, declining biodiversity and reacting rapidly to flooding. It is possible to turn this around, restoring the blanket bog to a condition which is a real benefit to all of us. The uplands of Calderdale also have a lower than average tree cover following historic land management practices. People who live in Calderdale today are very used to seeing fields and open spaces, grazing animals and pastures - land which has been designed by and is managed for the benefit of humans. Declining bee populations have become a well understood symbol of the impact of intensive agriculture. Additionally, a whole host of birds, insects and other animal populations have declined and species are at risk of becoming extinct. We could change how we use land to plant more trees, restore upland bog habits and give more space to wildlife. Our landscape would start to act as a carbon sink as plants thrived. Wild spaces could attract tourists and leisure visitors. Our future landscape could look quite different. Are we willing to see changes made?" There would appear to be some discrepancy in what the Prime Minister, Government Ministers and local authorities are saying regarding the protection of our greenbelts, communities and health. Based on what all these departments have said - house building should be stopped! We should be looking after our communities. We should be protecting our "Green and Pleasant Land" .

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

Sound Reason:

See above comments

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

Duty to Co-operate Reason:

See above comments

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU621**

Site ref (if applicable): **LP0026**

Person ID: **1243017**

Name: **Mrs Jowett**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Please refer to the attached document.

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

Sound Reason:

Please refer to the attached document. There are a number of issues with the proposed plan which are also applicable to (LP0177, LP0952, and LP1625) in the Greetland area. In addition, it is important to consider how strongly the local community feels about the proposed development to the highly sensitive greenbelt area. You only have to look at the >600 members of the local pressure group which has received press coverage as well as regional television attention to evidence this. The group are extensively lobbying to demonstrate how opposed the local community are to the proposal which looks to have a devastating impact on the local area.

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

Duty to Co-operate Reason:

Please refer to the attached document

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5606076>

Comment ID **HRU622**

Site ref (if applicable): **LP0026**

Person ID: **1243019**

Name: **Mrs Sally Farrar**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

See comments below.

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

Sound Reason:

OBJECTIONS TO SITES LP0026, LP0177, LP0952, LP1625 SITES IN GREETLAND The revision of Calderdale's

local plan now includes a massive number of houses across 4 sites in Greetland, within a 0.8 mile stretch of a busy B road. All of which is Green Belt. I just don't get it? How can any councillor, cabinet member, planning officer or local government officer even consider the destruction of green belt and open spaces in this area. This is not sustainable and will destroy this area for good, The impact of this for our nature and for our community will be catastrophic. Greetland is a small, historic village on a hillside, surrounded by playing fields, open grazing land and moorland at the top, and by open grazing fields, woodlands, a small river and a long existing wildlife corridor in the valley bottom. The hillside is criss- crossed with ancient public footpaths, and an old, well worn public footpath runs through our wildlife corridor in the valley bottom, travelling the whole length of the proposed local plan site. Green and open spaces around us keep us sane and healthy. We love living here and we use our open green spaces each and every day for fresh air, for walking and exercise, and to engage with the natural environment which is on our doorstep. Mass housing development across these sites will have adverse effects immediately and for future generations. The natural habitats of the wild deer, foxes, bats, owls, herons, field mice and squirrels will be destroyed or changed forever due to noise and light pollution, general disturbance, and by upsetting the natural balance of these areas. Our wildlife will disappear and our youngsters will not experience the sounds of the owls hooting in the night nor see the bats flying about at dusk. One day they will just have to research these things on the internet. How sad is that? Without green and open areas in our community, people will have little option but to jump into their cars and drive somewhere else in order to enjoy natural open spaces and learn about nature and wildlife. Car fumes then causing further damage to the environment. That does not make any sense nor it is sustainable. Changing economy following Brexit The Local Plan was drawn up between 2016 and 2018, with amendments made in October 2019. The plan was based on housing requirement to support the economic growth plan. This country has just seen its biggest change in 47 years as we have now left the EU. The Local plan is now out of date and should be reviewed as housing need will be significantly smaller post Brexit. Reduced immigration will lead to a reduction in the amount of new housing required and therefore reduce the need to release Green Belt. A few small businesses and light industries exist in this area but there are no large employers locally and there are no new sites identified for planned local employment. This will mean that people moving into Greetland will have to travel out of the area for job opportunities, Loss of green belt and wildlife corridor According to the Local Plan, all of this land is classified as -“highly sensitive green belt” We need to protect it not lose it. NPPF Section 13 Protecting Green Belt Land Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: 1) to check the unrestricted sprawl of large built-up areas (2) to prevent neighbouring towns merging into one another (3) to assist in safeguarding the countryside from encroachment (4) to preserve the setting and special character of historic towns (5) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Calderdale Council, in its own evidence, concludes that this area of Green Belt performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt but, most decisively, would see the coalescence of Greetland and West Vale and the deterioration of the identity of both places undermining the Council's Settlement Hierarchy. Notwithstanding this, extreme number of housing proposed in and around the site is undeliverable during a single plan period in plan-making terms and unsustainable in infrastructure terms in relation to the capacity of existing highways, schools and local services. Esther McVey's (former Housing Minister up to Nov 2019) written policy on Green Belt land quotes:: "protecting the Green Belt goes beyond protection against development" “My department is working with DEFRA (Department of Environment, Food & Rural Affairs) and Natural England on the once-in-a-generation Environment Bill which will establish a comprehensive legal framework for environmental improvement and make net gains for biodiversity mandatory for new development. Of course one of the most important environmental safeguards we have is the Green Belt. And I want to be clear that our commitment to this is as strong as ever, with any changes only happening in exceptional circumstances ; protecting the Green Belt goes beyond protection against development” Exceptional circumstances in The Government White Paper -“Fixing our Broken Housing Market” Paragraph 1.39 states that: -“The Government wants to retain the high bar to ensure the Green

Belt remains protected, but we also wish to be transparent about what this means in practice so that local communities can hold their councils to account therefore we propose to amend and add to the National Policy to make it clear that: authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including making effective use of suitable brownfield sites and the opportunities offered by state regeneration : Do Calderdale Council have the evidence that they have done this? CPRE also state "The development of brown fields sites should be a priority; there are more than enough brown field sites to fulfil the requirement without having to encroach onto Green Belt". There are plenty of brownfield sites in Calderdale that would enhance the area by development and these are the sites Calderdale Council Planning Department should be targetting, thus complying with the current legislation and Central Government policy. Calderdale Council Planning Dept has stated several times that developers are not interested in brownfield sites . This is against Government Policy and does not constitute exceptional circumstances . Accordingly, this site in the existing Green Belt should be removed from the Plan as the exceptional circumstances for its release do not exist. Increased Traffic and congestion on Saddleworth Road, particularly at the traffic lights junction with Stainland Road There has been chronic congestion at the 2 traffic light junctions in nearby West Vale for a number of years now. This crossroad junction carries traffic from Greetland, Barkisland and Ripponden, traffic to and from Elland and Junction 24 of the M62, and all traffic travelling between Halifax and the villages beyond the Outlane area of Huddersfield and Junction 23 of the M62. This junction is dangerous and congested throughout the day, especially since a Cooperative store was sited in the middle of the Saddleworth Road/Stainland Road traffic light junction about 4 years ago. Vehicles including buses and trucks fight over the space at both junctions in West Vale and often selfishly push their way through when the lights are red, in turn putting other road users and pedestrians at risk of harm. The flow of slow moving vehicles is constant and air pollution here has increased as a consequence. The local roads are incapable of taking any additional traffic. Calderdale Council are proposing to allow 600 plus properties to be built on Saddleworth Road thus adding to the chronic issues which already exist. The WSP Brinkerhoff Report of May2017 has indicated that traffic will increase by over 107% if the proposed housing developments were to go ahead. Calderdale have suggested that one solution here will be to alter the traffic lights, presumably to allow more traffic off Saddleworth Road, but this does not make any sense as the all of the other traffic using the junction will back up further. This is a ridiculous -"solution" to the problem and is not feasible nor sustainable Calderdale Council plan to manage traffic in the area by creating a new junction on the A629 for traffic travelling between the Elland bypass and Sowerby Bridge. Additional traffic lights here will only cause the traffic coming from West Vale to back up, especially as there is a low railway bridge for high sided vehicles to negotiate. This is not a viable nor sustainable solution. Increased air pollution What about Clean Air for all ? The primary goal of the Clean Air Act is, I quote -"to achieve national ambient air quality levels protective of public health and welfare by establishing air quality standards and imposing limitations on air pollutant emissions from both stationary and mobile source s" A huge increase to the number of vehicles (due to the proposed housing developments) using and sitting in traffic queues on the lower part of Saddleworth Road will impact negatively on the air quality in the area. There is an infant school and pre school located between 2 of the proposed large housing sites on Saddleworth Road. Traffic around the school is already a major safety issue and the road around the school is a bottleneck twice a day. Increased emissions from the standing traffic will affect the children and families using the school and those living near the school . Air quality standards will be compromised. The centre of West Vale probably has poor air quality already . Let's not add to it for the sake of our health. Calderdale Local Authority is already in the top quarter of deprived authorities so the quality of our living space is crucial. We all need to realise the cost of air pollution. Traffic is the biggest air pollutant. Poor air quality where we live impacts on health and care costs, due to increasing incidents of disease, lung problems and cancers. Clean air is crucial for our health and well-being, and Greetland is a community continually trying to create a better and healthier environment for the benefit of everyone. Money has been obtained from the Woodland Trust for a large number of trees to be planted in the area. This is being undertaken in order to maintain good air quality

and to help preserve the habitat for the wildlife corridor here. Massive house building in the area will negate these actions. Flooding The green belt sites on Saddleworth Road proposed for housing development are flood plains and actually flood when rainfall is particularly high. These sites flooded very badly on Boxing Day 2015 and again as recently as 8 th and 9 th February 2020 and this weekend 15 th February 2020. This has been particularly dreadful for properties situated below Saddleworth Road. Residents have already posted images of the flooding in this Portal for reference. The Black Brook (our small river) collects all of the run off from the hills and fields the length of the Blackburne Valley. Over the years, the path of the Black Brook has altered as the heavy volume of water gouges out new routes for itself downhill and in the valley bottom. The fields here are a natural and essential soak off and any building on this land would further increase the flooding in immediate area, and of land, properties and businesses downstream of the Black Brook. Current policy and legislation on flooding states "due to every increasing wide-scale flooding incidents in the country and the ever increasing threat of climate change new development in a flood area that increases the risk of flooding in the development's community or elsewhere is not permitted". Calderdale Council Planning Department has a duty of care to comply with current policy and legislation on flooding. Housing should not be built on sites such as this. On the last Local Plan these sites were graded as a Class 1 Severe Risk Flood Area (LP0177) and were removed; in compliance with current legislation they should not have been put back into the amended Local Plan in October 2019. Flooding in the valley below Saddleworth Road contributes to flooding in the Calder Valley. The Black Brook flows through West Vale and discharges into the river Calder in Elland. In 2015 and sadly ongoing this week, major flooding has occurred on the River Calder at Todmorden, Hebden Bridge, Mytholmroyd, Sowerby Bridge, West Vale, Elland and Brighouse. The huge number of housing units proposed for Greetland will increase greatly the peak flows and volumes of runoff from the area. Developers use Sustainable Urban Drainage techniques to slow this flow down, but the clay soil in this area make this technique unsuitable. The alternative is large storage areas either above or below ground. These techniques will reduce peak flows and slow down the flows but they do not reduced the volume of runoff which will be more than doubled, and in turn contribute to flooding in West Vale, Elland and Brighouse . Severe flooding continues to be disastrous for local businesses, both small and large, destroy peoples lives and impacts negatively on the local economy. Sewer Flooding The sewers that runs close in the Black Brook and down Saddleworth Road are already overloaded with combined sewer overflows (CSO) that discharge into the brook. The proposed housing will more than double the number of houses connected to these sewer systems. The se additional foul flows will almost double the flood volumes and significantly increase the number of spills and volumes from the CSOs which will increase the pollution to the brook. This will have a negative impact on the fish and wildlife in the area. The Environment Agency have a no deterioration policy for CSOs but there are currently no plans to upgrade the sewer system in Greetland and West Vale to negate this impact. Lack of infrastructure Saddleworth Road is a very busy B road carrying a great deal of traffic up and down the valley, including many heavy stone trucks from the quarries and heavy trucks from Sonoco, the nearby recycling plant, There has been one fatality on this stretch of road in the past 3 years. Allowing large scale house building on Saddleworth Road will be dangerous and cause huge problems not only on this road itself but for the adjoining narrow roads and areas. Calderdale Council do not have any plans in place to improve safety or traffic congestion on Saddleworth Road. They propose that long standing traffic problems in West Vale will improve following the creation of a new junction on the A629 towards Halifax, but I do not see how this can possibly alleviate the problems in the immediate locality of West Vale/Saddleworth Road. A planned station at Elland (no-one seems to know when this is meant to happen) will not alleviate any of this congestion either, as more housing in Greetland will mean more cars travelling through West Vale junction to access the station!. Traffic from the wider area will also have to come through West Vale to access any station. Public transport links remain poor on Saddleworth Road and have not altered in years. There is one bus an hour into Halifax or Elland for shopping and other services and the nearest train station is a car or taxi journey away. Apparently at the Local Plan Meeting it was stated: "We will ensure that there are bus stops near any new developments" I do not see how this will help at all as we do have bus stops already but not much of a bus service! Local primary and

senior schools are full. With a proposed 600 plus new houses here, another 200 school place will likely be needed locally. Local GP practices are already under strain. Further strain on local hospitals Local Dentist has a waiting list of 600 for NHS places.

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

Duty to Co-operate Reason:

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

Suggested Modifications:

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

Comments:

Additional Evidence Link:

Comment ID **HRU651**

Site ref (if applicable): **LP0026**

Person ID: **1243064** Name: **Mr Martin Cleminson** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

I believe the plan to build hundreds of houses on this site are not sound for a number of reasons. Green belt: The land earmarked for being developed is green belt land. This is supposed to be protected land. There are brown field sites nearby such as the recently demolished mills at West Vale which should be considered instead for development. There are no exceptional reasons to remove the area's Green belt status and it goes against policy to prevent urban sprawl. Wildlife: This land is the home to many species of animals, many of which are protected. These include bats, deer, foxes, herons, owls, and sparrowhawks. There are also many mature trees which should be protected. There are public footpaths across the site and this is a well-used site where people enjoy spending time in the fresh air. Flooding: Areas of the fields on which these new houses are proposed, are part of a flood plain. Since 2015 these fields have flooded completely three times, the latest time being during Storm Ciara in February 2020. The existing volume of

water currently causes flooding further downstream, including west Vale Cricket Club, the Bowling Green, and adjacent allotments. The overflowing Black Beck adds to the flooding of Heath Rugby Club and garden centre on Stainland Road. Any additional development will cause further fast flowing run-off from roofs, roads etc., and increase the flooding further, having far-reaching consequences for not only the owners of these future houses, but also the rest of Greetland, West Vale, Elland and as far as Brighouse Air pollution: The development site is in a valley which traps fumes. The proposed developments added together could bring 1000 or more extra cars, and with them, a massive increase in air pollution to the children of Greetland Academy (especially the youngest children, the infants, whose part of the school is located on Saddleworth Road), as well as the toddlers and pre-schoolers at Sunnybank Pre School. Traffic Congestion The existing road network in West Vale cannot cope with the current traffic at rush hour. Traffic regularly backs up significantly on both Saddleworth Road and Stainland Road. The increase in cars and road usage through Greetland will lead to more traffic jams as they struggle to get through the bottle neck. This will have a detrimental effect on all sides of the traffic lights, including the ones which are located next to West Vale Primary School as well. Infrastructure. The amount of houses being planned in Greetland is completely disproportionate to the size of the village. 600 new homes in total all being built off Saddleworth Road will increase the population of Greetland by around 30% in an area where the infrastructure is not appropriate. Greetland is a community in its own right but is a village, not a town. The local schools are full, the doctors and dentists' surgeries are not taking on new patients, the road network is pushed to breaking point, the sewer system is at capacity.

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

Duty to Co-operate Reason:

Suggested Modifications:

Sites with more suitable infrastructure and brown field sites should be considered

Comments:

Additional Evidence Link:

Comment ID **HRU668**

Site ref (if applicable): **LP0026**

Person ID: **1118926** Name: **Mrs Denise Walker** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

The infrastructure for this and other developments on Saddleworth Road is not adequate to take the traffic we have, let alone more vehicles. Greetland has become a thoroughfare for traffic from the M62, Barkisland and Normand residents have to use Saddleworth and Rochdale Road, or go through Ripponden and Sowerby Bridge, both of which have issues with the amount of traffic they already have. West Vale is very congested as it is, the air pollution will increase in the bottom of the valley. We do not have a local

train station for Elland or Greetland, which would help I'm sure

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 **HRU674**

Site ref (if applicable): **LP0026**

Person ID: **955884**

Name: **Mrs Dinah Boylan**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

NPPF para 143 states that Green Belt needs protection, we should be protecting Green Belt and this proposal opposes all we should be doing to preserve it NPPF para 144 - Inappropriate development in Green Belt - which this is This is Grade 3 agricultural land which is even more important with the climate change we are experiencing and will continue to experience. The development is inappropriate when there are available Brownfield site in the area. The land as it is provides a natural break of the boundary of our village (not Town), prevents urban sprawl and does contribute to safeguarding our countryside, preventing air pollution (Calderdale have declared a climate emergency), flooding, the area has a positive mental effect in a stressful world.

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

Sound Reason:

Green belt should provide access to open areas of land, along with the suggestions of LP0177, LP0952 and LP1625 there will be no open countryside easily accessible to promote wellbeing. The natural inhabitants such as Deer, Bats, Herons, Owls, Kestrels, Pheasant, Fox and more will be all displaced. We try to teach the next generation about conservation and reducing carbon emissions. The development will increase traffic substantially to an already over subscribed junction. As the schools, Drs, Dentist have full capacity more mileage will have to be covered to meet families needs. Black Brook is regularly flooding as land water drains in from this area. If building is allowed here more water will flow into it which will contribute to more regular flooding. Every episode of flooding erodes the water course.

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

Duty to Co-operate Reason:

If it hadn't been for The Greetland Pressure Group" we would have been unaware of these plans. No notification was given to people residing in the areas and I feel some are still oblivious to it. The process should be kept simple and made easy to get involved, this certainly hasn't happened. Without assistance I would not have been able to air my thoughts on your site, even then I find it hard to know which

comments to put in which box. As a duty to co-operate this plan needs to be removed along with other green belt proposals. It has a purpose which the council is aware of and it is very worrying that these beautiful area can be trashed by people who obviously have no idea of the value of open unspoilt green belt

Suggested Modifications:

Remove from plan. This plan will not be legally compliant as per NPPF. I do not understand what you are asking above

Comments:

Additional Evidence Link:

Comment ID **HRU689**

Site ref (if applicable): **Lp0026**

Person ID: **1243128**

Name: **Ms Emma Bownas**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I do not consider these plans in the spirit of the Calderdale Vision 2024. It is difficult to comment on legality as am not a planning expert, and find the information on the pages provided inaccessible as a member of the public. However do not see how building on saturated fields, when we are currently flooding, and also the risk of decreasing air quality in an already congested area as a good idea.

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

Sound Reason:

I do not consider this plan to be sound and in line with strategic direction of Calderdale expressed through Vision 2024 as being a great place to live. Strategically we are looking at the effect on mental well-being of green spaces and are proposing to build on the local green spaces destroying both habitat for animals and birds and also taking away trees. I cannot see the evidence and justification for this and have seen that there is an identified flooding risk. We are already seeking support from national government to support our borough. How are the schools, doctors and dentist surgeries going to cope.

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

Duty to Co-operate Reason:

I was unaware this was live until I got a leaflet through from our councillors. It has not been made clear or widely advertised and is really hard to navigate once you are in it. I do not believe you have been transparent about the plans

Suggested Modifications:

To not build on the whole side by the river

Comments:

Additional Evidence Link:

Comment ID **HRU714**

Site ref (if applicable): **LP0026**

Person ID: **960336**

Name: **Mrs Caroline Wood**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

It does not comply with the NPPF

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

Sound Reason:

not consistent with 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 the ' most sensitive Green Belt parcels ' entirely from the plan

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5606894>

Comment ID **HRU715**

Site ref (if applicable): **LP0026**

Person ID: **1242716**

Name: **Mrs Elyse Margetson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I am not qualified to assess this. However, I would comment that the process to object is neither easy or straight forward and the online forms and documents presented are complicated, lack clarity and make it challenging and off-putting to object. Although I am a technologically literate person I have found it onerous to find my way around the information. Additionally, I feel that insufficient time has been allowed for full consideration of all the documents which need to be read to understand this issue fully and for objections to be made. I also have significant concerns about the way in which the Local Plan has developed and cannot be sure that it is free from political bias. Having read the report ' CC37 - Potential

Sites - considered and rejected, November 2019 - Report on options rejected ' I see that the main difference with those sites rejected and the sites LP0026, LP0177, LP0952 and LP1625 which were accepted were that they didn't have a developer on board! This makes me very concerned that the desire to develop land quickly, because there is a ' developer on board ', may have been a key factor as to whether a particular location was included in the Local Plan, especially as I note that in the Consultation comments there are already a set of plans from Barratt Homes for site LP0177. The interest and profits of prospective developers should not be a reason at all (never mind a key reason) for a site being included or excluded from the plan. The other reasons cited for excluding sites such as Green Belt, Access, Wildlife issues, Flooding constraints all apply to sites LP0026, LP0177, LP0952 and LP1625 and therefore these sites should equally be rejected from the Local plan. Importantly, I would also comment that plans LP0026 (The Gate Farm), LP0177 (Land adjacent Ellistones Place), LP0952 (Land at New Gate Farm) and LP1625 (Land to the west of Silverdale Terrace) should not be considered as separate proposals. They are so interrelated (sited within a small 1 km area along Saddleworth Road) that they can only be assessed fairly if considered as a whole. By splitting them out as separate plans the full picture is being concealed. My comments therefore are relevant to each of the plans LP0026, LP0177, LP0952 and LP1625 and should be considered as equal objections to all four sites.

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

Sound Reason:

As a non-specialist lay person I can only comment from a personal, common sense and non-political perspective as someone who has lived within the Greetland community for a number of years and who has attempted to read the various policy documents attached to the local plan. My main points of objection are as follows: Loss of Greenbelt land Increased risk of flooding Loss of Wildlife Habitats Lack of Infrastructure Traffic congestion, air pollution and noise pollution 1. Loss of Greenbelt Land Once it's gone, it's gone! We cannot bring back Greenbelt Land once it has been built upon. Land that is precious to this community and to the wider community - from a visual, physical and emotional perspective - to both humans and wild animals. Para 98 of the National Planning Policy Framework (NPPF) states that ' Planning Policies and decisions should protect and enhance public rights of way and access '. There are public footpaths through all the sites in the proposed development plans which are used by groups and individuals from both within the local community and from further afield. I personally regularly use these public footpaths to dog walk. It is important to have this safe space to exercise, particularly as it feels unsafe to walk along the main Saddleworth Road with the heavy lorries hurtling down, and with many of the side roads having no or insufficient pavements. I am also aware that many Duke of Edinburgh groups use these public rights of way as part of their expedition practices (both of my daughters have taken part in such walks). To take away these footpaths is to deny our young people the opportunity to enjoy the countryside and open air whilst undertaking physical activity in a natural and safe environment, away from traffic, crime and pollution. To allow these developments would be to create urban sprawl, gradually encroaching on precious greenbelt Land that our community relies on for our wellbeing. The NPPF at a para 133 states that -“ The Government attaches great importance to Green Belts ” and at para 136 that - “Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified” At para 144 it further states -“ local planning authorities should ensure that substantial weight is given to any harm to the green belt ” and at para 145 -“ a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt ” Building on these sites is contradictory to all of these statements. I do not see any exceptional circumstances evidenced or justified in these proposals to allow building on this Greenbelt land. I note that comments, from what appears to be the Council, have been made on each individual plan to the effect that ' The site is currently designated as greenbelt but also performs the function of a natural/semi-natural open space. An assessment of open space in the area shows that there are sufficient alternative natural/semi-natural areas within the catchment of this site to meet the adopted standards ' - I do not agree with this statement. When each of

the 4 sites are reviewed together a large and disproportionate area of open space would be lost to this small community. At para 137 the NPPF states ' Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. '. I do not agree that the authority in this case has satisfied these conditions. There are many other sites, including disused mills, within the Calderdale catchment that do not sit within Greenbelt Land that could be considered for development before ruining for ever the Greenbelt Land in these sites.

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

3. Loss of Wildlife Habitats I often see wild deer running through the fields. I regularly witness squirrels, pheasants, bats and foxes in the area. Para 177 NPPF states that ' The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site'. I would argue that building on the land which is included in these proposals will be extremely detrimental to the wild animals within the area. No mitigation can prevent the impact of urban sprawl and the destruction of their natural habitats.

4. Lack of Infrastructure The local schools are already full. The local dentists have long NHS waiting lists. The GP surgery is full and often can't accommodate appointment requests. Adding an additional 600+ houses and the associated increase in residents is simply unsustainable. The local bus services are already inadequate for the community. The 503 which passes through West Vale is often so full that it does not stop to pick up passengers at peak times or it is delayed 20-30+ minutes because of the traffic. The 343 which passes through Saddleworth Road only once per hour takes up to an hour to reach the destinations of Huddersfield or Halifax. The bus stops for the 343 are only on one side of Saddleworth Road, making it extremely unsafe for the young and elderly alike. Since moving here and hoping that my teenage children would be able to get the bus to school, we have found that it simply is not feasible or safe for them to do so. How will adding additional residents - who will also need to use their cars - improve this situation? The

local roads are already riddled with potholes and are constantly patched (an unsatisfactory and unsustainable situation). They are constantly under repair as the local drainage system is ineffective and causes regular surface issues. Add to that a level of increased traffic caused by the development as proposed and the road conditions will be worsened even further. Specifically with regard to site LP0026, the preferred access as stated on the plans is off the lower section of Scar Bottom Lane. For anybody who knows this road and uses it regularly, creating an access point on it to this housing development is ridiculous. It is a narrow lane with no pavements and dry stone walls at either side. It is already not wide enough for 2 cars to pass without having to come to a virtual standstill. It is certainly not wide enough to create an access point for 60-70 houses. I can see nothing in the proposals to remedy the lack of infrastructure. 5. Traffic congestion, air pollution and noise pollution Greetland and West Vale already suffer chronic traffic congestion, with the roads used not only by locals but also by the large wagons travelling to and from the Bosch Industrial Estate and the Sonoco factory. In addition, the road is used as a cut through from Ripponden and the M62. The village is already at breaking point at peak times and the roads cannot cope with the existing volume of traffic, let alone adding to that with these proposed developments. At school drop off times Saddleworth Road becomes a single lane road due to the parked cars on both sides. It becomes an obstacle course to get through and the large lorries that frequent the area make it dangerous for road users and pedestrians. I fear for the lives of the children trying to get to school daily. Adding the level of traffic that would be inevitable with the proposed development would be frankly overwhelming. By increasing the congestion in the area, the air pollution will by default increase. This will especially have enormous impact on the young children attending the schools in the area and Sunnybank Pre-school with its playground just metres away from the busy congested road. Similarly, a disproportionate scale of building in this area would create a disproportionate increase in the level of noise pollution to this community.

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

Duty to Co-operate Reason:

I do not understand what this means.

Suggested Modifications:

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

Comments:

Additional Evidence Link:

Comment ID **HRU719**

Site ref (if applicable): **LP0026**

Person ID: **1116556**

Name: **Mr Roger Nichols**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

We understand that the whole development from West Vale west up Saddleworth Road will increase the population of the area considerably and reduce the extremely precious green belt space between Greetland and Barkisland. Once green belt land is lost it is never regained. While some building may be necessary for new housing in the West Vale area we feel that the western end of the development proposed up Saddleworth Road should be totally preserved as green belt to maintain the character of the area along with the existing wildlife of the area. There are a number of brownfield sites available for development, for example the demolished mill at the bottom of Saddleworth Road, in addition to many brownfield areas round Calderdale and in Halifax. At no time should green belt be even considered for development when numerous brownfield sites are available in the area. A particularly important concern is the access to facilities in the area for residents. As far as we are aware the schools are full as are the doctors and dentists. There is already a shortage of doctors both locally and nationally hence more housing will make an existing problem worse. It is already difficult enough to get an appointment within a reasonable time at our local medical centre without more people having to be accommodated. A second major concern is the traffic flow in the area. Saddleworth Road already carries a large volume of traffic and at rush hour the congestion at the traffic lights in West Vale can cause considerable problems. Increased housing, and hence car numbers, will only make the present problems even worse and increase air pollution caused by slow moving and idling engines. Following the recent storms we have again experienced a massive amount of water running off Norland Moor and down the hillside into the valley. At the time of writing there is a constant stream of water running down the roads and gardens and into the valley below. This water has to go somewhere and will flood sites lower down the valley . With global warming the storms will only become more severe and more frequent with all the consequence this will bring. As far as we are aware there is not a massive unemployment problem or large number of homeless families in the area so why do we need such a huge increase in housing provision? There is a bungalow for sale on Trenance Gardens which has been on the market for the best part of twelve months so where is the shortage of housing? If the idea is to create dormitory areas for people who work in Leeds or Manchester this is extremely impractical. The M62 is already very congested during the day and at rush hours is totally jammed. The train service through the Calder Valley is extremely poor and unreliable as has been highlighted recently in the media. Finally, If there is a demonstrated demand for more housing it should be allocated fairly round the whole of Calderdale not concentrated in one particular area. For example, is there a development plan for the Stainland Road 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:

Comment ID **HRU720**

Site ref (if applicable): **LP0026**

Person ID: **1242630**

Name: **Mrs Jayne Wallace**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The main reason for my objection against proposed plans: 1. Disproportionate amount of land to be made available compares to other areas of Calderdale. 2. Brownfield sites that meet the criteria need to be exhausted before sensitive greenbelt is ever considered, the latest Brownfield Register is dated 2018!! 3. Loss of Greenbelt would have a large impact on the various wildlife in the area and the welfare of local residents alone with visitors from outside Greetland who find the green open space as part of their well-being. The loss of the Greenbelt would also lead to the acceleration of Urban Sprawl. 4. Flooding, the proposed sites are deemed to be high rise flood areas, any development and loss of the fields would 100% increase flooding to houses and business's not just in the immediate area but increase flooding further down the Calder in places such as Brighouse and Mirfield. Business's and property owners will consequently struggle to get insurance if they can get any cover at all! possibly pulling people out of business leading to loss of jobs, can the council/government take this risk to people lively hoods and afford the clean up costs and associated costs with flood damage every-time this sort of disaster occurs. Surely this amount of money could be better spent on education/healthcare to name but a few for this reason alone. The sites should be withdrawn from the local planning as the time of putting together this objection. The British Army have been drafted in to aid with the relief of the flood damage areas, this speaks volume of how serious this problem has become. 5 . Infrastructure. Local schools are full to capacity already, further development will lead to more parents taking children to school in cars with the knock on of more traffic this leading to more congestion further reducing the air quality. Even more doctors surgery's, dentists etc would be straining to cope with further capacity of proposed scales.

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 **HRU722**

Site ref (if applicable):

Person ID: **1239176**

Name: **MRS Jo Greidanus**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Please refer to Calderdale's Statement of Community Involvement, which has not been followed in this process. CMBC have already stated "These sites lies within the approved Green Belt. The proposed development does not meet the exceptions, as it does not preserve openness and conflicts with the purpose of including land in the Green Belt. As such, it represents inappropriate development in the Green Belt, which is, by definition, harmful. No very special circumstances have been demonstrated to clearly

outweigh the harm caused by the development. It is therefore considered that the proposal would be contrary to NPPF Chapter 13 (Protecting Green Belt Land)"

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

Sound Reason:

LP0177, LP0026, LP0952 and LP1625 are so close in proximity that they should be viewed jointly as well as individually. They are all in Greetland which is not Elland so why have they been recorded on this plan as Elland. Main points of objection 1 - Flooding 2 - Loss of green belt and impact on wildlife corridor 3 - Air Pollution and Traffic 4 - Infrastructure The DEFRA 25year plan states that "National flood management involves the use of a variety of measures including storing water on open land". NPPF 14 (157b) states that plans should work to safeguard land from development that is required or likely to be required for current and future flood management. The flood plains that these sites provide are critical and flood regularly (as can be seen today) ; soaking up excess water at times of heavy rainfall, allowing space for the water to flow and be stored on open land in times of flood, even after the river has burst its bank, and protecting land further downstream from potential flooding. Developing these sites is completely contradictory to this DEFRA plan and the NPPF. The current policy and legislation on flooding states - "due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere. Chapter 14, paragraph 163 of the NPPF states: - " When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere It is abundantly clear that any development on these sites would directly oppose all these pieces of legislation and policies and would hugely increase the risk of flooding to both surrounding properties and the wider community in Greetland, West Vale and even as far as Elland. Any development of these sites and reduction in the capacity of these flood plains will only ensure that the flooding we now see will be more frequent and cause even more damage. This is not acceptable or fair therefore these sites should be removed from the local plan. Loss of Green Belt and Wildlife Corridor Esther McVey, our current Housing Minister's written policy on Green Belt land states "protecting the Green Belt goes beyond protection against development" NPPF chapter 13 states that there are 5 purposes to green belt land- CMBC has already stated that this land strongly fulfils these 5 purposes. NPPF ch13 paragraph 143 states "Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances". Protecting the green belt is very important. To include these sites in the local plan goes against all the above policies and there is no evidence of any special circumstances to support development on this land. The sites are a wildlife habitat for many many different species. CMBC has already stated that a constraint is that Black Brook running through LP0177 is a UK BAP priority habitat. NPPF Chapter 15 states that planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes and sites of biodiversity. It also states - to protect and enhance biodiversity and geodiversity, plans should: identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including wildlife corridors. Developing these sites will put this precious wildlife corridor and all its inhabitants at great risk directly opposing the NPPF legislation and the DEFRA 25 Year Plan. This site should therefore be removed from the local plan Air Pollution and Traffic Congestion Air pollution and traffic congestion obviously go hand in hand. The junction of Saddleworth Road and Stainland Road in West Vale is already a bottle neck and far too congested and unable to cope with the traffic volume that passes through it on a daily basis. WSP Parsons Brinckerhoff Report on this Transport Network identifies that traffic congestion at the juncture of Stainland Road-Saddleworth Road would increase by approximately 105% traffic congestion at the juncture of Stainland Road-Rochdale Road would increase by over 100% Public Health England (PHE) (11th March 2019) reports that air pollution is the biggest environmental threat to health in the UK, with between 28,000 and 36,000 deaths a year attributed to long-term exposure. There is strong evidence that air pollution causes the development of coronary heart disease,

stroke, respiratory disease and lung cancer, and exacerbates asthma. Professor Paul Cosford, Director of Health Protection and Medical Director atPHE, said: "Now is our opportunity to create a clean air generation of childrenKey interventions local authorities can take include redesigning cities so people aren't so close to highly polluting roads." Professor Cosford said: We recommend that at a local level, any new policy or programme of work which affects air pollution should aim to deliver an overall benefit to the public's health. Greetland School and Sunnybank Pre Schoolare right on Saddleworth Road at the boundary of LP0177. The increase in traffic of over 100% and therefore pollution, that will be an outcome of development on this site ignores all the recommendations of PHE and put many people's health at risk especially that of our children which is totally unacceptable. Infrastructure Greetland Primary Academy, West Vale Primary School and Brooksbank High School are all full. With a proposed 600 houses, using Calderdale MBC's figure for school places of .36 per household (IDP section 9.14) this indicates another 206 school places would be needed. Where are these places to be found? Local Dentist has a waiting list of 600 for NHS places. The nearest NHS dentist was recently found (July 2019) 11 miles away in Kirklees. Local GP surgeries are already full. It is obvious that building a further 600 houses within this area will completely overwhelm the existing infrastructure making this land unsuitable to develop. Summary There are so many constraints and negatives to all these sites that cannot be adequately mitigated against. To develop these sites opposes so many policies, recommendations and pieces of legislation which CMBC appear to have given little or no consideration to. I respectfully ask that these sites are removed from the Local Plan. They should never have been included as they are completely unsuitable for numerous reasons. As this portal is difficult to use and I have struggled to attach the photo evidence of flooding that I have mentioned, I will be also emailing my objection with photos attached.

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

Duty to Co-operate Reason:

Suggested Modifications:

Remove these sites from the local plan and keep them as greenbelt

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5606064> ; <http://calderdale-consult.objective.co.uk/file/5610060> ; <http://calderdale-consult.objective.co.uk/file/5610065> ; [http://calderdale-consult.o](http://calderdale-consult.objective.co.uk/file/5600224)

Comment ID **HRU725**

Site ref (if applicable): **LP0026**

Person ID: **959779** Name: **Mr Stephen Cunningham** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

The revised Calderdale Plan was drawn up between 2016-18 and is no longer fit for purpose. The UK has just seen its biggest change in 47 years as we have now left the EU. The plan was based on housing requirements that supported the economic growth plan. The plans are not current and not compliant. Economic growth should be called for review. My objection to the proposed planning application is referenced where possible using sections of the National Planning Policy Framework (NPPF) the relevant paragraphs are referenced in brackets. Negative impact on the Green Belt The proposed development represents a disproportionate amount of new development in Greetland. It will lead to urban sprawl (NPPF 134a); it also encroaches on important green space (134c), removes natural habitat (174a) and takes away an integral part of the wildlife corridor (170d). The Government supposedly attaches great importance to the Green Belt (133). The aim of Green Belt policy is to keep the land permanently open for the benefit, enjoyment and wellbeing of people. It also exists to support biodiversity and enhance the local landscape and visual amenity (141). If the proposed application ; along with other similar proposals - is passed we lose the Green Belt forever. This should only happen in exceptional circumstances (136). What are these exceptional circumstances? This proposal would be harmful to the Greenbelt so should not be approved (143). I have lived in Greetland for many years and seen large areas of green space lost to infilling. The demolition of older properties to accommodate new housing developments has led to the loss of trees, wildlife habitat and buildings of historical interest. We have also lost moorland; large gardens have been built on, even graveyards and recreational space has been developed. The argument for this infilling from Calderdale Council has always been that unless we accept it we will lose the greenbelt! Now that there is no place left to infill they want to start taking away the greenbelt. If we carry on like this Greetland will lose all its green space and biodiversity. The function of the Calderdale Council Planning Department is to facilitate sustainable development that make a positive contribution to the local environment (144). It is NOT the role of the Council to make unacceptable sites within the Green Belt available to meet their housing targets. Flooding The proposed development will only add to our current climate change problems. This is already in the balance. On Sunday 9th February I parked next to the Black Brook in West Vale to buy groceries. The water line was close to bursting. I then walked towards the rugby club on Stainland Road where the river Calder had overflowed into the nearby fields. The football pitches and rugby club were under several feet of water. Buildings and cars were completely submerged, roads barely passable. I also discovered later that a large shipping container used to store equipment at the rugby club had been washed down river and had collided with Elland Bridge ; only recently re-opened in 2016 after previous collision damage during a flood. How can Calderdale Council declare a 'Climate emergency' then allow this development to proceed? The loss of flood plain and increase in run-off water from the proposed developments will only increase the likelihood of such devastation and further reduce local resilience to climate change (155, 156, 157). It will not only increase the flood risk in West Vale and Elland (163) but other areas along the Calder. Infrastructure The development ; in conjunction with others ; will place a great strain on local services. Will new schools be built? How will the road network cope? The sewage and drainage systems are already at full stretch. Will there be new Health surgeries and Dental practices built into the proposals? This isn't acceptable to the local community (124) and it will not improve the character or function of the local area (130). Traffic impacts, congestion and air pollution Congestion at the junction of Sadleworth and Stainland Roads ; often backed up as far as Greetland Infants - is already unacceptable. At present it can take 20 minutes to get through the junction at peak times. Adding all the extra commuter traffic from the proposed development will increase congestion and the levels of harmful greenhouse gasses - nitrous oxide, carbon dioxide etc. This will have a detrimental affect on the health of local people particularly children at the school. The NPPF supports a low carbon future that helps to reduce greenhouse gasses and minimises flood risk (148, 149, 150a,b) not increase them. The proposed development is not sustainable in NPPF terms. It actually goes against many key criteria set out in the NPPF. When the harm identifiers are considered the proposals is not even close to being sustainable. I don't think Calderdale Council could actually have got it more wrong ; and they talk about a Climate Emergency! Not for the first time I watched this Climate Emergency play out in front of my own eyes last week; flooded roads, rivers bursting their banks, cars under water, homes and businesses completely

destroyed ; real people devastated. It's easy for Calderdale Council to stand up and say anything - I think the time has come for them to stop talking and start taking some positive action to help local people and their communities.

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

Duty to Co-operate Reason:

Suggested Modifications:

Remove this proposal from the plan. Revise the plan

Comments:

Additional Evidence Link:

Comment ID **HRU745**

Site ref (if applicable): **LP0026**

Person ID: **958865**

Name: **Mr Andrew Jones**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Although I 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 land which is currently under greenbelt is home to many different types of wildlife. on many a Saturday or Sunday morning I have enjoyed walks around Greetland with my 2 young children. Above the fields in question I have pointed out to the kids the birds of prey such as kestrels and buzzards. In the fields there are rabbits and foxes can be seen. I have been shown photographs of deer in the fields here (although I havent seen them myself). Whilst walking the dog in the evening bats (now protected) are plentiful in the area. Owls can often be heard late into the night. Traffic - The developments for housing which are proposed in the area (including this one) suggest a total of 600 houses. Most houses nowadays possess a minimum of 2 cars. this means an extra 1200 cars will be using Saddleworth Road. The Junction of this road with Stainland Road is already unable to cope with the amount of traffic at peak times as it is. With the built up nature of the buildings surrounding this junction there is no scope for road widening for extra lanes, etc. I have witnessed many near misses at the set of lights at this junction due to the frustration of drivers not being able to progress their journeys in a reasonable time. Adding extra traffic to this junction is simply crazy and irresponsible. The extra traffic would also create an increased road safety risk for the school and the residents of Saddleworth Road Pollution - The extra traffic above would cause considerable extra pollution to the people on Saddleworth road (including pupils at the school) and the people of west vale and the surrounding area as the cars would queue way back up the road, all moving at

crawling pace with idling engines. Services - The local School is already at capacity and would struggle to take any extra students. The dentists and doctors surgery waiting lists are already stretched and would become over subscribed Recreational areas lost - The areas that many people use on regular basis for walking and seeing the countryside will be lost. Once these areas are taken out of greenbelt and built on they are gone for good. The NPPF states that land should only be removed from greenbelt in exceptional circumstances and when brownfield sites have been considered first or used up. There are other sites in the area which could be used before the greenbelt in question. When looking through the number of sites which have been considered and rejected, the reasons for rejection are 'greenbelt', 'sloping site', 'flooding and drainage issues', 'no developer on board'. The only difference in the sites now being proposed is that a developer is interested in them. THAT IS IN NO WAY EXCEPTIONAL CIRCUMSTANCES - They don't care about greenbelt they just want easier money.

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

Duty to Co-operate Reason:

As a resident of Greetland I have not received any form of contact from the council regarding the considered development and have not heard of anyone else having had any contact or consultation either. The people I have spoken to feel there has been no cooperation or consultation with the whole process.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU754** Site ref (if applicable):

Person ID: **960048** Name: **Mr Gerald Stancliffe** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

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

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU759**

Site ref (if applicable):

Person ID: **1243285**

Name: **Mrs Karen Bagley**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

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

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU766**

Site ref (if applicable):

Person ID: **1243284**

Name: **Mr Martin Bagley**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

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

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU769**

Site ref (if applicable):

Person ID: **1239036**

Name: **Mrs Sarah Williams**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

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

Sound Reason:

Wildlife ; This is a well-loved and used wildlife corridor that residents enjoy regularly. We should be protecting these areas and the wildlife included. On my route to school my children and I often see deer (In this specific field) herons, pheasants, and a variety of birds. This is what I, and many residents, love about living in the area and do not want to lose. This is vital to our health and wellbeing and our Greenbelt should be protected at all costs. Traffic & Air Pollution ; The traffic from Greetland into West Vale is already awful, it can take up to twenty minutes just to get through the traffic lights at the bottom of Saddleworth road after the school run, I cannot imagine the effect on traffic and infrastructure by adding another 600 households in the area, including this site. Bryan Royd is already used as a through road and is very narrow and dangerous when two cars pass, more cars will add to this issue. The additional cars will also add to the air pollution, the cars, trucks, farm machinery and buses queue up Saddleworth road right next to the school and pre-school, exhausting toxic fumes for our children to breathe. Flooding - There are lots of natural springs and the area is prone to flooding. Drains and sewers are often overflowing and burst. Building on this land will further disrupt the water running down the valley, adding to the issue.

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

Duty to Co-operate Reason:

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

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU771**

Site ref (if applicable): **LP0026**

Person ID: **1242630**

Name: **Mrs Jayne Wallace**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

1. Loss of valuable greenbelt and habitat for many birds animals and wildlife. The Greenbelt is valuable open space for all members of the local community to enjoy brownfield sites have not been considered and the Calderdale register has NOT been updated. Development should be encouraged to build on and re develop sites regardless of the cost. For the sake of Greetland which would be lost forever. Any development on this site would pave the way for more urban sprawl leading to further development in the future along Saddleworth Road, the Greenbelt needs protecting now for further generations!! 2. The site is within a high risk flood area with many natural springs. The NPPF states no development is to be permitted on land that is liable to flood. It is fact that global warming is on the increase and the unpredictable extremes of heavy rainfall on the rise loss of this site to housing would 100% be a contracting factor to more regular flooding in West Vale, Elland, Brighouse and all along the river Calder. Calderdale has spent millions of pounds of tax payers money on floor defence schemes to try and prevent major catastrophic disruption as seen in 2015 and again in 2020 only to be compromised by the release of absorbent fields for development. THIS SITE SHOULD NOT BE CONSIDERED FOR THE LOCAL PLAN!!!! 3. The local plan doesn't consider the infrastructure that will impact on Saddleworth Road/Scar Bottom Lane, no room for expansion of the roads. The traffic lights in West Vale are already congested particularly at peak times and would not handle increase volumes of traffic this will in turn lead to higher volume of air pollution, Calderdale council have a policy in place to reduce this pollution. Severe health issues would increase with the loss of the clean air. The local schools are full and over capacity as any further developments the local plan has made no allowance for any increase for child places. The same goes for Doctors & Dentists! 4. Greetland has a disproportionate amount of developments compared to other areas of Calderdale and no plans for local employment opportunities in the local plan!

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

Sound Reason:

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU803**

Site ref (if applicable): **LP0026**

Person ID: **1243003**

Name: **Mr Richard Corney**

Organisation:

Agent ID:

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

Points of Objections

Air Pollution Flooding Infrastructure Wildlife Traffic Congestion Loss of Public Space

1 Air Pollution The severe increase in traffic (potential for 1200 additional cars which could equate to 2400 journeys each day) down an already congested Saddleworth Road. Already in peak periods the traffic backs up Saddleworth Road for at least ¼ mile with engines running! No air quality assessment has been undertaken in this area so we don't even know the extent of air pollution before the proposed development. Greetland Academy has the playground for nursery children right at the side of the road; goodness knows how the proposed development will impact on these vulnerable, very young children which goes against the Government's strategy on air quality.

2 Flooding The area concerned floods at least once a year in varying degrees; the worst instances have been Boxing Day 2015 and recently 9th February 2020, the development will have a significant detrimental impact on flooding. The run-off into Black Brook will cause serious downstream effects, for example, the floods of 9th February saw Greetland Cricket Club, Heath Rugby Club and Clayhouse Park all under water; so it is hard to understand how any flood plan could mitigate against the risk of even more severe flooding in West Vale leading to major issues for all the businesses and residents. It is impossible to understand how the proposals in the local plan can be in any way aligned to the recent declaration by Calderdale Council of a climate emergency. These proposals will inevitably lead to a flooding emergency, probably not what the Council had in mind by its declaration.

3 Infrastructure The development has only one road in and out and all the residents would have to use their cars as the development is not on a regular bus route; again going against Government Transport Policy. Local schools are over-subscribed meaning parents will have to use their cars to take children to schools out of the area. All doctors' surgeries are currently full and one is soon to close again impacting on the two remaining local ones. Other developments in the area have been mainly 3 and 4 bedroom houses (not affordable housing for local people). This type of housing attracts commuters who typically work in Leeds or Manchester and will therefore have to travel to the motorway via West Vale or Ripponden neither of which can cope with traffic as it is today!

4 Wildlife The local wildlife will be decimated by any further development particularly birdlife such as Herons, Kestrels, Kingfishers which are seen very regularly flying around the area.

5 Traffic Congestion It is already extremely difficult to pass through the traffic lights at West Vale and the development will only add to the congestion both in West Vale and also Ripponden.

6 Loss of Public Space The area concerned is a very valuable green space for people of all ages to enjoy daily

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

Comments:

Additional Evidence Link:

Comment ID **HRU804**

Site ref (if applicable): **LP0026**

Person ID: **1242261**

Name: **Mrs Yvonne Lovatt**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

None of the residents of Greetland have received any notifications of any of these planning proposals. Many residents only found out by a post on facebook. Surely the people who it effects the most have a right to know!!

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

Sound Reason:

GREEN BELT. The green belt should be protected. The land is a wildlife corridor and home to foxes, deer, hedgehogs, owls, heron and bats, some of these animals are protected. The land is used by walking groups, individuals and children. It is good for our health and well being. If this development goes ahead Greetland will have no green space left. Brown fields should always be used first! FLOOD PLAIN. The land is a natural flood plain and natural springs flow down to the Greetland hillside to the proposed site. The land is always wet and boggy and prone to flooding. Building on this site would only increase other areas to flood. AIR POLLUTION. The proposed development will bring extra vehicles to the roads with them extra air pollution which the local community especially our children will be breathing in. Traffic is regularly at a stand still on Saddleworth Road, the traffic lights in West Vale can't cope now let alone if this development goes ahead. INFRASTRUCTURE. The proposed development is completely disproportionate to the size of the village. Greetland is a village not a town. The local schools are full. Dentists have long waiting lists. Doctors are full to capacity. Roads are turning into car parks due to the volume of traffic.

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 **HRU805**

Site ref (if applicable): **LP0026**

Person ID: **1243003**

Name: **Mr Richard Corney**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

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

Sound Reason:

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

not have to drive to enjoy the countryside.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU809**

Site ref (if applicable): **LP0026**

Person ID: **1243147**

Name: **Mrs Sue Corney**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

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

Sound Reason:

Points of Objections Air Pollution Flooding Infrastructure Wildlife Traffic Congestion Loss of Public Space
1 Air Pollution The severe increase in traffic (potential for 1200 additional cars which could equate to 2400 journeys each day) down an already congested Saddleworth Road. Already in peak periods the traffic backs up Saddleworth Road for at least ¼ mile with engines running! No air quality assessment has been undertaken in this area so we don't even know the extent of air pollution before the proposed development. Greetland Academy has the playground for nursery children right at the side of the road ; goodness knows how the proposed development will impact on these vulnerable, very young children which goes against the Governments strategy on air quality. 2 Flooding The area concerned floods at least once a year in varying degrees ; the worst instances have been Boxing Day 2015 and recently 9 th February 2020, the development will have a significant detrimental impact on flooding. The run off into Black Brook will cause serious downstream effects, for example, the floods of 9 th February saw Greetland Cricket Club, Heath Rugby Club and Clayhouse Park all under water ; so it is hard to understand how any flood plan could mitigate against the risk of even more severe flooding in West Vale leading to major issues for all the businesses and residents. It is impossible to understand how the proposals in the local plan can be in any way aligned to the recent declaration by Calderdale Council of a climate emergency. These proposals will

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU817**

Site ref (if applicable): **LP0026**

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?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU830**

Site ref (if applicable): **LP2006**

Person ID: **1243416**

Name: **Ms Elizabeth Hutchinson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Flood Risk. I live halfway up the hillside between Rochdale Road and Saddleworth Road and already have water run off flooding my house several times a year now. This has become more of a problem in recent years and is likely to continue with warmer and wetter climate changes. The water running off this hillside relies on drainage into the green sites at the bottom of the valley. If this disappears there will be an increase in incidence of flooding to homes and businesses. Health and Wellbeing. This plan slices away at green space already relied on by locals for exercise. It is well documented that access to green spaces has significant positive impact on physical and mental wellbeing. Impact on wildlife. This plan will cause a destruction to wildlife. There exists a small ecosystem in this area of land which provides habitat for a range of plant life, insects, birds and animals including butterflies, damselflies, moths, grey heron, buzzards, kingfishers and roe deer all of which I have spotted in this area. Air Pollution. This plan will result in the addition of hundreds of vehicles and add to the already congested West Vale. It will have a knock on effect to Elland and routes in and out of Halifax. This will increase the levels of air pollution and noise pollution. No mention on plans to strengthen infrastructure to serve the increase in the population. Eg. Schools, GP, dentists, Road networks and public transport. Someone is going to get rich on the back of this plan and it isn't going to be Calderdale residents who will be poorer for the reasons above.

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

Duty to Co-operate Reason:

Suggested Modifications:

Remove the building proposed on the green space

Comments:

Additional Evidence Link:

Comment ID **HRU831**

Site ref (if applicable): **LP0026**

Person ID: **1243415**

Name: **Mr Paul Sutcliffe**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

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

Sound Reason:

LP0026, LP0177, LP0952 and LP1625 are so close in proximity that they should be viewed jointly as well as individually. They are all in the Greetland ward so why have they been recorded on this plan as Elland. Main points of objection 1: Flooding 2: Loss of green belt and impact on wildlife corridor 3: Air Pollution and Traffic 4: Infrastructure 5: Urban sprawl Flooding We have seen first-hand the devastation caused by the recent floods (Boxing Day 2015 and 8 th -9 th February 2020). Every proposed site flooded. The upland sites LP0026, LP0952 and LP0952 were rivers, the land already saturated by the vast amounts of natural springs this area has. The lower level part of LP0177 was indistinguishable from the river. The flood plains that these sites provide are critical and flood regularly ; soaking up excess water at times of rainfall, allowing space for the water to flow and be stored on open land in times of flood, even after the river has burst its bank, and protecting land further downstream from potential flooding. The development of this land will increase flood risk further downstream towards Westvale, Elland and Brighouse (Evidence of which can already be seen on Social media sites, Calendar and national news outlets). To develop on these sites would contradict the DEFRA plan and the NPPF. The DEFRA 25year plan states that "National flood management involves the use of a variety of measures including storing water on open land". NPPF 14 (157b) states that plans should work to safeguard land from development that is required or likely to be required for current and future flood management. The current policy and legislation on flooding states - "due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere. Chapter 14, paragraph 163 of the NPPF states: -" When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere It is abundantly clear that any development on these sites would directly oppose all these pieces of legislation and policies and would hugely increase the risk of flooding to both surrounding properties and the wider community in Greetland, West Vale and even as far as Elland. Any development of these sites and reduction in the capacity of these flood plains will only ensure that the flooding we now see will be more frequent and cause even more damage. This is not acceptable or fair therefore these sites should be removed from the local plan. Loss of Green Belt and Wildlife Corridor Calderdale's Green Belt Review map of 2020 clearly shows that all proposed sites in the Greetland ward are 'Most Sensitive Green Belt Parcels'! Does this mean the council disregards its own statements? Esther McVey, our current Housing Minister's written policy on Green Belt land states "protecting the Green Belt goes beyond protection against development" NPPF chapter 13 states that there are 5 purposes to green belt land- CMBC has already stated that this land strongly fulfils

these 5 purposes. NPPF ch13 paragraph 143 states "Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances". Protecting the green belt is very important. To include these sites in the local plan goes against all the above policies and there is no evidence of any special circumstances to support development on this land. The sites are a wildlife habitat for many different species. CMBC has already stated that a constraint is that Black Brook running through LP0177 is a UK BAP priority habitat. NPPF Chapter 15 states that planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes and sites of biodiversity. It also states - to protect and enhance biodiversity and geodiversity, plans should: identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including wildlife corridors. Developing these sites will put this precious wildlife corridor and all its inhabitants at great risk directly opposing the NPPF legislation and the DEFRA 25 Year Plan. This site should therefore be removed from the local plan.

Air Pollution and Traffic Congestion Air pollution and traffic congestion obviously go hand in hand. The junction of Saddleworth Road and Stainland Road in West Vale is already a bottle neck and far too congested and unable to cope with the traffic volume that passes through it on a daily basis. WSP Parsons Brinckerhoff Report on this Transport Network identifies that traffic congestion at the juncture of Stainland Road-Saddleworth Road would increase by approximately 105% traffic congestion at the juncture of Stainland Road-Rochdale Road would increase by over 100% Public Health England (PHE) (11th March 2019) reports that air pollution is the biggest environmental threat to health in the UK, with between 28,000 and 36,000 deaths a year attributed to long-term exposure. There is strong evidence that air pollution causes the development of coronary heart disease, stroke, respiratory disease and lung cancer, and exacerbates asthma. Professor Paul Cosford, Director of Health Protection and Medical Director at PHE, said: "Now is our opportunity to create a clean air generation of children. Key interventions local authorities can take include redesigning cities so people aren't so close to highly polluting roads." Professor Cosford said: We recommend that at a local level, any new policy or programme of work which affects air pollution should aim to deliver an overall benefit to the public's health. Greetland School and Sunnybank Pre School are right on Saddleworth Road at the boundary of LP0177. The increase in traffic of over 100% and therefore pollution, that will be an outcome of development on this site ignores all the recommendations of PHE and put many people's health at risk especially that of our children which is totally unacceptable.

Infrastructure Greetland Primary Academy, West Vale Primary School and Brooksbank High School are all full. With a proposed 600 houses, using Calderdale MBC's figure for school places of .36 per household (IDP section 9.14) this indicates another 206 school places would be needed. Where are these places to be found? Local Dentist has a waiting list of 600 for NHS places. The nearest NHS dentist was recently found (July 2019) 11 miles away in Kirklees. Local GP surgeries are already full. No plans have been put in place to cope with the expected population rise. Waiting times can already go beyond seven days and GP's are already pushed to 'breaking point'.

Urban Sprawl The following is from Calderdale Council's website regarding green belt land and urban sprawl: 'Green Belt - The functions of the Green Belt are to: check the unrestricted sprawl of large built-up areas; prevent neighbouring towns from merging into one another; assist in safeguarding the countryside from encroachment; preserve the setting and special character of historic towns; and assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. At what point do you stop building and filling in the gaps? Is the future name of our area going to be called BRIGELL WEST VALE GREET BARK ISLAND?

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

Duty to Co-operate Reason:

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

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

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU838**

Site ref (if applicable): **LP0026**

Person ID: **955884**

Name: **Mrs Dinah Boylan**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Green belt should be protected as per NPPF. Planning should have had one application for sites LP0026, LP177, LP0952, LP1625 as the all run into one another. Planning states this is Elland. This is not Elland. The planning states LP1625 is a natural barrier preventing urban sprawl and a boundary of the village, this will be lost forever with serious implication for the future. I would suggest these plans are both illegal and immoral.

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

Sound Reason:

Traffic - there could be in excess of 1000 cars with all these 4 sites for which neither Greetland or West Vale could not prepare for. West Vale is unable to cope with the volume of traffic now despite tinkering with the traffic lights. The impact the additional traffic will effect air quality- our childrens future, our mental health. The roads are narrow and unable to take two way traffic in areas. Saddleworth road and Rochdale road (which will be used as an alternative) is regularly reduced to one lane as cars park on both sides, especially noticeable at school times. The area becomes gridlocked. Calderdale have already declared a climate emergency, how can they justify these harmful plans. The younger generations are the ones who will have to deal with the levels of toxic fumes which will be constantly spewing from the cars into the school playing fields and classrooms. The struggling NHS will have to pick up the bill, but the children will have to travel far to get a Drs appointment, theres no space locally. I have photographs of the fumes from the factory in the valley- Sia Fibril. Has an air quality control been done on this, best time is early in the morning. Schools, Drs, Dentists are already full, where will these people go for the care they are entitled to. One only has to see the news to see what damage we have done and are doing to our precious landscape. We have a climate emergency yet seem hell bent on increasing the problem. Building on flood soakaways which in turn adds to more water run off to flood plains, which will have houses on (increasing our house insurance), water then has to find an overspill somewhere, this means a tragedy further down the line. We live in area abundant in wildlife, some common species and many more rare species. How can they survive?What provisions have been made for them?

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

Duty to Co-operate Reason:

Calderdale have not co-operated - residents were not informed by them. They have listed the one plan as four. They have the area wrong, we are not Elland, we live in a village- Greetland. This has been a very difficult site to negotiate. Calderdale is not co-operating with NPPF, DEFRA's 25 year plan to develop a nature recovery network, not providing residents with access to open sites, not safeguarding the countryside. There is a disproportionate amount of building concentrated in one area.

Suggested Modifications:

Only one modification required - remove LP0026, LP0177, LP0952 AND LP1625

Comments:

Additional Evidence Link:

Comment ID **HRU840**

Site ref (if applicable): **LP0026**

Person ID: **1243410**

Name: **Mrs Gina Walsh**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

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

Sound Reason:

Disproportionate amount of building in the Greetland area. As sites 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. Previous potential sites which were considered and consequently rejected (report CC37) stated that it would give a "disproportionate increase to Barkisland village". The increase based on the same dataset above would have been 16.6%. which is far less than the huge potential increase of up to 33.8% in Greetland. If this plan was to be passed, surely that would show a great inconsistency in policy and legality regarding planning applications. NPPF (para 133/ 134) also states that aim of Green Belt policy is 'to prevent urban sprawl' and 'to prevent neighbouring towns merging into one another.' The location of this proposed site would go against that ; there would be less clear boundaries between Greetland and Barkisland and the distance from local amenities would become an issue. The Inspector's letter of 16 th July 2019 to the Council notes (para 14) that: ' Local plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.' The site might be 'within a 0-15 minute journey of a town centre; is within 600m of Public Open Space; and within a 15 minute journey to a GP surgery' these simple benefits are irrelevant when it takes into account that the massive increase in traffic from the combined sites will increase travel time substantially, the local GP surgery is full and may no longer be within 15 minutes due to the increase in resulting traffic; that the majority of the public open space is actually part of the local plan to be built on; that the 'cleaner air' that Calderdale is fighting for will be heavily polluted by the increase in traffic and associated pollution from our already crumbling infrastructure. Where are the benefits? NPPF (para 94) also states: 'It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: 28 a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.' Greetland does currently have sufficient school places to meet the needs of the existing community but not for the needs of potentially 600 more families. I can clearly state that no consideration or preparation has taken place to resolve the issue of school places with the local schools and, as our immediate schools are academies, they cannot be forced to expand. The only benefits I can see are short-sighted ways of meeting council targets and lining the pockets of developers ; no benefits for the existing community or for the people who would live in these houses. Flood areas The NPPF states that planning policies and decisions should promote public safety and take into account wider security and defence requirements by: ' a) anticipating and addressing possible malicious threats and natural hazards... This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area .' As stated previously, LP0026, LP0177, LP0952 and LP1625 must be viewed collectively. Although the land cited on the local plan LP0026 does not flood to the same extent as other sites mentioned, this site soaks up a huge amount of surface water presently (see photo attached) and if this land was built on, who knows where the water would go. We should not be building on high risk flood areas, or in extremely close proximity to high risk flood areas in Calderdale. We are not like the rest of the country! We are a high risk flood area, within a high risk flood area! The news today (15/2/20) is full of stories of flooding in our area with the army currently in Calderdale trying to prevent a repeat of the devastation from Storm Ciara

last weekend. Labour Council leader, Tim Swift, is urging the Government to grant Calderdale urgent assistance by recognising it as a 'Tier 1' authority getting extra funding support because it is one of a small number of areas of the country at "sustained risk" of flooding.' Not a flood risk as stated in the local plan but a flood certainty- an area which will flood repeatedly and has over the last 5 years. Additionally, the NPPF states that, ' due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere .' The council's housing targets are not area specific so houses do not need to be built in Greetland on Green Belt in high risk flood areas. Due to the topography of our area ; sloping grassland, the trees, the flat flood plains and underground springs, we are not at threat of it happening as we are already seeing localised flooding. Building houses on any of the flood plains mentioned in the local plan will only turn this into a catastrophic problem like other villages / towns in the Calder Valley are experiencing. Houses built in a high-risk flood area are not sustainable as the NPPF requires them to be. Millions of pounds are already being spent to aid flood prevention and there are numerous reports of houses /businesses not being able to get insurance due to risk of flooding. These are not the types of houses which Calderdale needs. This does not solve the housing crisis ; it just causes Calderdale more problems and costs more money. Air pollution 'There are legal requirements and aspirational targets for levels of different air pollutants. The government recognises that protective health - and tackling air pollution - requires action, and is committed to improving the UK's air quality and reducing harmful emissions. The draft Clean Air Strategy, published in May 2018, sets out the case for action and demonstrates the government's determination to improve our air quality.' The proposed plan completely contradicts the Clean Air strategy, as the amount of land allocated on Saddleworth Road is disproportionate to the amount of land Calderdale has to allocate as a whole. The air pollution which will initially be caused during any building work and then from 600+ new houses and potentially an additional 1200 cars on the road also must take into account the pollution caused by the factories opposite this site in particular: Bosch Industrial Estate and Sonoco Factory. The overall air pollution will be harmfully concentrated on this one road, a road with an unusually high concentration of children so close by for so much time. This again appears to be a short term solution without really thinking about the long term impacts this will have on the health of the residents and more importantly, their children.

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

Duty to Co-operate Reason:

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

Suggested Modifications:

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

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5608421>

Comment ID **HRU845**

Site ref (if applicable):

Person ID: **960062**

Name: **Mr Dean McIntyre**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

I previously submitted my concerns regarding the proposed residential developments on the Saddleworth Road, Greetland area when these were initially proposed. Due to living locally, I am concerned at the scale of the proposed developments and the impact that this would have on the local area. I do accept however that there is a requirement for housing as we move forward and that the Greetland area will have to have some further development. I believe that the proposed developments taken together are too much for this area based upon the following. As such I object against each proposal especially when taken as a whole. I accept that smaller scale development in the area as well as other areas in Calderdale is required, but more importantly is sustainable. Less than 150 houses in this area would be a more sustainable. Again the rest spread throughout the District would have less impact throughout the District. My objections regarding some of the proposed developments are similar. The main issue is the scale of development in this corridor. The impact of proposals LP0177(200), LP0952 (246), LP0026 (67) and LP1625(30) which would mean 543 houses being built in the Saddleworth Road corridor would have a significant impact on the amenities in the area as per the below. Traffic Congestion - The junctions of Saddleworth Road, Greetland and Rochdale Road, Greetland where they join Stainland Road, are already congested on a daily basis especially at rush hour. The impact of over 540 houses would be significant. Taking into account, most households have two cars, this would mean over 1000 more cars in this already congested area. This would mean increased traffic at the junctions of Saddleworth Road and Stainland Road, and Stainland Road and Rochdale Road. An increase of 105% and 100 % respectively according to the plan proposals. With this will come increased air pollution and potential increase danger to pedestrians based upon the increase in traffic on Saddleworth Road. Other side roads will be used as -"rat runs" i.e. Sunnybank Drive / Sunnybank Road to Rochdale Road and Brian Royd Lane to Rochdale Road when Saddleworth Road becomes too congested, which will be a daily occurrence if these houses were built. Schools ; A significant expansion of the Greetland Academy would be required to meet the new demand. Based upon the proposals the number of new pupils would be significant. I would suggest the main school site on School Street cannot be extended much more, which would impact on the Saddleworth Road annex. There is room for school expansion here, but parking is already an issue and would be significantly worse with school expansion. More housing means more children, means bigger schools on limited sites and means more parking issues in both areas. This also means an increased danger to children and residents through inconsiderate parking and driving and using Sunnybank Drive/Sunnybank Road and Brian Royd Lane as a cut through to both schools. Environmental / Flood plain issues ; Site LP 0177 is proposed on a flood plain area. On 9/2/20 the river again broken its bank and the fields are flooding again. Second time in at least 5 years! I have video footage of the significant flooding to this area. This is not a once in a lifetime occurrence, but a now regular occurrence. Site LP 0952 and site LP 1625 on the plans states that these proposed areas are subject to flooding from surface water. I simply cannot understand the logic behind proposals to build houses on areas susceptible to regular flooding. Calderdale is one of the hilliest areas in Yorkshire, so why would there be a proposal to build new houses on a flood plain area and in areas susceptible to excessive surface water issues when there are many other areas within the District that are not susceptible to this and which are not on a flood plain? The cost of the previous flooding and the now recent floods will run into millions for the council and residents. Environmental Factors - Part of the development plan states that environmental protection is a major consideration. I would suggest that development on the scale proposed and in the three areas LP 0952, LP 0177 and LP 1625 would have a significant impact on the local environment and take away the local countryside from local residents. LP 0177 and LP 0952 are wildlife

habitats with the latter also being an area of deciduous woodland. LP 0177 and LP 1635 are also archaeological sites of interest. Crime ; At the present time, the Greetland, West Vale and Stainland area is a safe area to live. Crime is relatively low compared to other areas within Calderdale. The addition of over 500 new houses is likely to increase in the local area, which at the present time is relatively low in Calderdale. Such significant developments would attract criminals, both local criminals and travelling criminals. Amenities - Doctors surgeries will be affected with the large increase in patients. Accepting this may expand, I believe that this will still be negative in impact and may not be able to expand to take the increase in people. The impact on local people would be negative. I believe that the surgery is excellent at present and you can access services if required. Other factors ; Green Belt and Housing developers interested ; I have read the rationale as to why some of the previous proposed sites have now been shelved for development. Of note, factors highlighted on most are that they are on green belt sites and that there are no proposed developers interested. Interesting. The proposals in this area are on green belt land and I suspect that money is a factor as to why these areas have yet again been brought back to the table. Greetland is a sought after area, hence the reason why developers would jump at the chance of building houses in this area (more profit), and the council will receive more revenue based upon the housing bands. I am not naive and nor are other people, but this is a concerning factor for myself and no doubt other residents. Is money a factor as to why these proposals have been reinstated, not benefit to the area?

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU865**

Site ref (if applicable): **LP0026**

Person ID: **1243202**

Name: **Mr Lee Roberts**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Nothing as been taken into consideration concerning the floodplain, in 2015 (boxing day floods) the site flooded by biblical proportions that flood destroyed 3 bridges in our local area plus hundreds of homes and businesses where affected by it, we were told it was a once in a hundred year flood, if it wasn't for the natural floodplain on lp0026 holding back millions of gallons of water heaven knows how much more damage would have occurred, this land flooded again 2 weeks ago during storm Ciara, the floodplain did its job again holding back millions of gallons of water, it also flooded yet again last week during storm Dennis, it held back the torrents of water which pour down the hillsides from Barkisland, upper Greetland and Stainland, if this land was built on where on earth would all this water end up? somewhere further down the valley no doubt in someone else's cellar, living room, how many homes or businesses would be destroyed? even on dry days in the summer the water still pours down the hillsides the fields are still water logged!

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

Sound Reason:

Air pollution The air pollution from over a thousand extra vehicles using the main arteries, Stainland road, Saddleworth road and Rochdale road, at peak times the traffic backs all the way up Stainland road, we live up Saddleworth road by Greetland academy and the traffic is regularly backed up to there all the way from the traffic lights, in the opposite direction traffic backs up from the lights up to the 'scissor junction ' and back up into Elland, the main roads are very narrow and are struggling under immense pressure at the moment to cope with the existing traffic, also the amount of extra air pollution it will contribute too considering there are schools with young children nearby, poisoning our children poisoning their future. The proposed site is also a very valuable green belt wildlife corridor which supports a wealth of wildlife which includes bats (which are a protected species) woodpeckers, kingfisher, dippers, heron, fox, deer, newts and owls, the owls nest in the mature trees which are onsite, we as a community as well as people from surrounding villages use this area to relax unwind and to recharge our batteries it would be ridiculous if we had to all get in our cars and drive to another area of calderdale to do this, adding to more congestion and more air pollution.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5608881>

Comment ID **HRU869**

Site ref (if applicable): **LP0026**

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" [1].. - [2] [3]. Environmental health and environmental protection are very much related [4] The loss of Green Belt, Open Space together with the addition of possibly 2000 more domestic vehicles, to enable travel to places of employment, education, or social and pleasure, outside the immediate area, would certainly not make for a better protected environment.

Other Factors Other factors I would ask to be considered are; I have found that Calderdale's publicity surrounding their Local Plan proposals to have been very limited, giving the appearance of an absence of complete openness. I do not believe the attempts at consultation with the community have adequate or thorough. Unlike the previous website comments procedure, I have found the website difficult to navigate much less reliable, making it difficult to register comments. Calderdale's Local Plan Position Paper reported that there is - "considerable public disquiet over the allocation of land for housing on the south side of Saddleworth

Road this disquiet does not seem to be well targeted other than objections to Calderdale MBC" Calderdale has also received petitions from the residents of Greetland pointing out their dismay and objections to the initial Local Plan. Perhaps it might be prudent for the Council to review it's more current housing requirements, as a result of changes in national and international situations, together with a brownfield site in West Vale and other areas in Calderdale now becoming available for development. Because the same problems and arguments apply, I would like to add designated areas LP1625, LP0177, LP0026, and LP1407 to my objections. Considering all the areas designated in the current Local Plan for Saddleworth Road, together with the existing development over a long number of years, it would suggest that Saddleworth Road, Greetland appears to have been unreasonably discriminated against, when comparing the areas size for the vast amount of development. The development of brownfield sites should be a priority according to the CPRE, there are more than enough brownfield sites to fulfil the requirements without encroaching into Green Belt. Accessibility Access to and from Saddleworth road is difficult. West Vale is a bottleneck, as roads from four directions merge. Stainland road from Saddleworth Road, meanders through some single track country roads, and at Ripponden comes out at a busy T junction. The road is well used by HGVs, servicing Bosch in the valley, Sonoco, and quarries. Bus services are very limited, with West Vale being the closest hub to regular bus services. Green Belt NPPF Section 13 Protecting Green Belt Land Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: 1) to check the unrestricted sprawl of large built-up areas (2) to prevent neighbouring towns merging into one another (3) to assist in safeguarding the countryside from encroachment (4) to preserve the setting and special character of historic towns (5) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Calderdale Council, in its own evidence, concludes that this area of Green Belt performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt. Esther McVey's (former Housing Minister up to Nov 2019) written policy on Green Belt land quotes: "protecting the Green Belt goes beyond protection against development" The limited area of Green Belt remaining in Greetland should be retained because; Green Belt land has been removed from Local Plan proposals in other areas due to the ribbon effect. Because this is relevant to the land at the south side of Saddleworth Road, it should also be removed, otherwise it smacks of discrimination by Planning. On Calderdale's Local Plan in November 2016 the Green Belt survey for this area came out very strongly, and stated to be a "highly sensitive area" It continues to be farmland for cattle, sheep, and horses. Helps to safeguard the countryside from encroachment and the merging of neighbouring towns. Helps to emphasise urban regeneration. Additional comments In regards to highways, education, transport and medical, the facilities are totally inadequate to be able to sustain any massive development. Much of the Green Belt in the Greetland area has already been consumed by housing development over the years, to a disproportionate degree. Work by CPRE suggests that there are enough brownfield sites in Yorkshire and Humberside to keep councils going for 89 years to meet their 5 year housing targets. It would appear that population growth is likely to be amended substantially downward in view of recent European events. The Local Authority should seriously look again at other possibilities. Alternative proposed use for this site. None, to remain as Green Belt and open space.

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

Duty to Co-operate Reason:

Suggested Modifications:

The Green Belt at Saddleworth Road HX4 should be retained as Green Belt, and existing Brownfield sites planned for housing and included in the LP.

Comments:

Additional Evidence Link:

Comment ID **HRU882**

Site ref (if applicable): **LP0026**

Person ID: **1243517**

Name: **Mr Andrew Mandebura**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

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

Sound Reason:

Infrastructure Section 4.18 of the Cabinet report of 14 October 2019 - "Potential modifications to the draft Local Plan following the receipt of the Planning Inspector's post-stage 1 hearings letter" quotes: - "Exceptional circumstances must be demonstrated to justify the release of land from the Green Belt. Furthermore, careful consideration needs to be given to sites in the Green Belt to ensure that they support sustainable development. In this respect key considerations include the extent which the site would be accessible to existing public and active travel modes, and whether the development would be of sufficient scale to support the delivery of new infrastructure and comprehensive masterplanning." There is currently one bus service, the 343, operated hourly by Yorkshire Tiger which passes along Saddleworth Road and into West Vale. This is invariably a small single decker bus and does not provide a sufficient public transport solution in line with the proposals above. In addition, the current junction in West Vale between Saddleworth and Stainland roads does not adequately handle the current volume of traffic at peak times. This results in long waiting times which will only increase with an increase of additional housing. No changes to infrastructure in this regard have been proposed to handle the additional traffic and this junction will not benefit from the A629 development project. Therefore, I would assert that the neither does this plan support sustainable development or indicate comprehensive masterplanning. Finally, according to Council data on primary school admissions 60 places were allocated to new starters at The Greetland Academy in 2019/20. 33 of these were awarded on distance while 26 were awarded on the basis of siblings already at the school. If the planned admissions are also taken into account at Norland (15), West Vale (26) and Barkisland (30); this brings the total number of new primary school places within the range of the new development to 131. At this stage it has not been detailed how school infrastructure will be developed to cope with existing requirements in addition to the new development which will fall in this catchment area. Once again an indication of a lack of comprehensive masterplanning. As academies West Vale and Greetland are also not bound by the council to expand. Flooding The recent heavy rains brought by Storm Ciara and Storm Dennis have flooded the land proposed for development. Paragraph 149 of the National Planning Policy Framework 2019 states that - "Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk (p.46) and also states in paragraph 150 that new developments should - "avoid increased vulnerability to the range of impacts arising from climate change" The plans as detailed have no reference to the mitigation of flood risk which has shown to be a significant danger as they lie in an area assessed by the Environment Agency to be - "High Risk" Flooding areas - <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map?eastings=408233&northings=421102> The removal of

soil and land which absorbs water to be replaced by concrete and tarmac is likely to exacerbate this issue. Air Pollution As alluded to above. The increased congestion from possibly 1200 additional commuters will lead to a deterioration in the air quality. This will be compounded by the removal of trees for the development. In addition, this decrease in air quality will be right next to a primary school housing young children causing health issues which are well documented such as asthma.

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

Duty to Co-operate Reason:

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

Suggested Modifications:

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

Comments:

Additional Evidence Link:

Comment ID **HRU894**

Site ref (if applicable): **LP0026**

Person ID: **1242153**

Name: **Mrs Samantha Connett**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

No the proposal for the site fails to acknowledge many planning guidelines/ advice given on environmental and social factors. Upon reading the national policy planning framework, I have found many points that contradict what the council is trying to enforce, the main one I believe is below. Proposals affecting the Green Belt Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. A local

planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are: a) buildings for agriculture and forestry; b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it; c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces; e) limited infilling in villages; f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: " not have a greater impact on the openness of the Green Belt than the existing development; or " not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority. The council also failed to make the most affected people aware that these sites have been added back into the local plan when they were removed in 2017. Most people have only found out through social media and word of mouth, many residents who aren't on social media won't have found out about this.

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

Sound Reason:

No Flooding -This site is completely unsuitable for development. It is well known for flooding as it naturally takes all the water that flows from the higher parts of Greetland as well as a large amount of unground springs, seen by myself a week after the floods from storm Ciara on 09/02/2020. The level of devastation caused by this storm in the Calder Valley is only going to become more frequent as we face the battle of climate change, to build houses on such volatile land is completely unthinkable, If this land was developed the risk of the flooding would be devastating as the water usually soaked up by this land would be diverted elsewhere. Over thirty million pounds has so far been spent on flood defences in Calderdale, but as we face the threat from storm Dennis the Army had been called in to help protect us from flood water, but yet the council still wants to build on natural flood plains. Flooding cannot be mitigated against in this area. The land as it stands is helping to prevent further disaster, and must be left as it is to prevent further damage to our homes and community. To risk the homes and livelihoods of the community, when the community is so opposed to it is wrong as it is us who would suffer and end up having to pick up the pieces of our lives when, not if we're left with the repercussions of this development. The proposal does not meet national policy with regards to flooding. The NPPF states in paragraph 155 that "Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere". The recent floods we had on 09/02/2020 only strengthen my point. I will add evidence of the floods on this plot of land below. We are forever having interruption on our roads by the council having to do repairs on the water system, the water going into these as a result of the flood plain being destroyed would put even more pressure on this, leading to more roadworks and more road congestion. Clean Air Policy ; The quantity of houses proposed on this site would mean far greater emissions and air pollution in West Vale, the traffic at the 2 sets of crossroads in West Vale which nearly all driving residents of Greetland will use at least twice daily is stand still traffic at the best of times. the amount of cars this development would bring would only make this worse and drive up the pollutants in the air. Calderdale Council have declared a climate emergency, so how is it a justifiable decision to release greenbelt land and destroying the natural benefits that it brings, with reducing air pollution. There are many more suited brownfield sites within Calderdale that could be used instead. The Green Belt - Loss of large area of Green Belt The NPPF states that para When determining

planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused. on these grounds alone this site should be removed from the local plan. Taking away something so natural and therapeutic that benefits local people by getting in touch with nature and to get children out into open spaces should be the last resort and with so many brownfield sites still available I believe this goes against many of the policies on the NPPF. A report recently submitted to the Adult Health & Social Care Scrutiny Board stating the need to retain Green Spaces for the Health and Wellbeing of Calderdale residents. This report was submitted by the Head of Planning. (This report is on Calderdale MBC's Website) Infrastructure - the roads in and around Greetland are at breaking point on a good day, let alone when we have endless amounts of roadworks to contend with. the roads simply cannot take the proposed number of cars which all of these houses would bring with them. Both The Greetland Academy and West Vale Primary are full to capacity, as well as the feeder high school Brooksbank. Stainland Road Medical Centre would also struggle to attend to the additional patients this would bring with it, the local dentist has a 600 place waiting list for NHS patients. Allocation of land - Greetland is a village. So why is it included in with Elland in the local plan? Ripponden and Brighouse haven't been grouped. I believe this to be a deliberate attempt to mask the disproportionate quantity of building works being allocated to Greetland. while other wards have no sites added to the local plan. I believe this to be an unsustainable amount for this village, put that together with them all on one road and it's unbelievable. LP0026, LP0177, LP0952 and LP1625 are all on Saddleworth Road. Greetland is a community in its own right and when shown the amount of planned build in this one small area it is unacceptable. Greetland is HX4 and a village whereas Elland is HX5 and a town, we shouldn't be grouped together. Urban Sprawl - can cause increased traffic, worsening air and drinking water, threats to groundwater supplies, high rates of polluted runoff and increased flooding. The flooding on 09/02/2020 shows we don't need anymore reason to chance risking more flooding in our area.

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

Duty to Co-operate Reason:

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

Suggested Modifications:

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

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609115>

Comment ID **HRU901**

Site ref (if applicable): **Lp0026**

Person ID: **1115722**

Name: **Mr David Blagbrough**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Increase of traffic to already over used road

Do you consider the plan to be Sound?:

Sound Reason:

All land in this area is a flood risk the wildlife in area would be affected. Local school is at full capacity doctors surgery is at full capacity, at school time the road is extremely busy, the school is close to road and any further traffic would increase already bad emissions at the road side

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

Duty to Co-operate Reason:

FLOOD PLANE AREA

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU911**

Site ref (if applicable): **LP0026**

Person ID: **1243615**

Name: **mrs SAMANTHA mcfadzean**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

1. There were no working party meetings ahead of the Councils Cabinet Meeting of 4th October 2019 at which the decision to increase the housing numbers was made. Our local Councillors were therefore prevented from discussing the issues ahead of the cabinet meeting. 2. The local Plan does not address the implications of the National Planning Policy Framework, especially NPPF Para 177 and the associated PPG in the sustainability of Greenbelt Sites. For example under this site assessment it shows out of 17 sustainability assessments, this allocation has 10 uncertain and 1 negative Assessment.

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

Sound Reason:

The council has failed to differentiate between housing need and requirement as it has not evidenced its economic and employment growth forecasts. It appears that the plan has a grossly disproportionate emphasis on the Greetland community, with the 600 proposed houses off Saddleworth road. This is neither fair, reasonable or a balanced share to Greetland's size. The plan would create Urban Sprawl in our area which would have many negative consequences for Residents, Local Businesses and the environment. Such as: 1. Traffic - We already have a traffic congestion issue on Saddleworth Road, Rochdale Road and Stainland Road at key times, this plan would just exacerbate these problems. 2. Air Pollution - the increase

in traffic will lead to an increase in air pollution, particularly affecting the elderly and young children, the later of which attend the infants school located on Saddleworth Road below the sites included in the Plan.

3. The local School, GP and Dentist have no capacity to service the increased number of residents the Plan will create. There would need to be significant investment in Infrastructure however there is no provision in the Infrastructure Delivery Plan for the expansion of primary school places in Greetland and only an additional 75 secondary school places which is totally inconsistent with the NPPF guidelines. According to the Council's own analysis in its review of the Calderdale Green Belt in 2017 Plot LP0026 performed well in three of its five key purposes of Green Belt as identified in the NPPF. These are to check the unrestricted sprawl of large built up areas, to prevent neighbouring towns merging into one another and to assist in safeguarding the countryside for encroachment. It states that Green Belt have a positive role to play in fulfilling six objectives of which this plot meets five of them, so why has this plot been included in the Plan? The council has failed to provide evidence as follows: Building houses on this plot would extend the built up area of Greetland and undermine the objectives of the Green Belt. It would also contribute to the extension of Greetland towards Barkisland compromising Greetland as a Community, thus creating Urban Sprawl! Due to the nature of this parcel of land the Council concede that a hydrological assessment would be needed prior to any development. The site is poorly drained, is wet even in the height of summer and has a number of springs which flow through it. The installation of SUDS and green roofs is unlikely to compensate for the loss of agricultural pasture. If this land were developed it would promote water run off into Black Brook and increase flooding frequency, exacerbating the problems that we usually endure and have recently seen in our area due to Storm Ciara and Dennis. The Council's own Infrastructure Delivery Plan states 'effective flood risk management is achieved partly by avoidance of inappropriate development in high risk zones'. Recently even the Prime Minister has stated that there should be no building on Green Belt Flood Risk areas. All the trees in LP0026 have tree protection orders on them, the wildlife in particular the bats would suffer as a result of this development. I do not agree with the Council's assessment that the ecological damage would be acceptable! Large open spaces are needed for the mental and physical health and well being of all, urban sprawl has many negative consequences for residents and the environment. It states the access to this site LP0026 would be from Scar Bottom Lane. There is an existing gate in to the field which currently my neighbours and I have shared access over. If the proposals go ahead and over 60 houses are built on this site then approximately 60 to 120 cars will be using this access which is unacceptable as it is only a car width. Scar Bottom Lane is extremely narrow, when the buses use this road it essentially becomes one way traffic only, the farmer is continuously rebuilding his stone boundary walls due to accidents on this length of road. Another access should not be opened into Scar Bottom Lane, it would not cope with the increased traffic! Highways - The Council in its draft Infrastructure Delivery Plan it states 'There is no need to provide improvements to the West Vale junction.' I do not know how they have come to this conclusion. The current traffic problems encountered in this area cause a huge bottle neck of traffic at key times, the traffic lights are currently running at 117% and the maximum they should be running at is 93%! How can the plan to add 600 houses to Saddleworth Road not require improvements? Environmental Health - The Council claims it will mitigate against the environmental impact of increased Noise and Air Pollution but does not state how it will do this!

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

Duty to Co-operate Reason:

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

made it clear what they will do to make the Plan compliant.

Suggested Modifications:

The Council need to exclude LP0026 from the Local Plan and keep it as green belt and not develop it for housing in order to make the plan sound.

Comments:

Additional Evidence Link:

Comment ID **HRU913**

Site ref (if applicable): **LP0026**

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

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

There were no working party meetings ahead of the Councils Cabinet Meeting of 4th October 2019 at which the decision to increase the housing numbers was made. The local Councillors were therefore prevented from discussing the issues ahead of the cabinet meeting. The local Plan does not address the implications of the National Planning Policy Framework, especially NPPF Para 177 and the associated PPG in the sustainability of Greenbelt Sites. For example under this site assessment it shows out of 17 sustainability assessments, this allocation has 10 uncertain and 1 negative Assessment.

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

Sound Reason:

The council has failed to differentiate between housing need and requirement as it has not evidenced its economic and employment growth forecasts. The plan has a grossly disproportionate emphasis on the Greetland community, with the 600 proposed houses off Saddleworth road. This is neither fair, reasonable or a balanced share to Greetland's size. The plan would create Urban Sprawl in our area which would have many negative consequences for Residents, Local Businesses and the environment. Such as: Traffic - We already have a traffic congestion issue on Saddleworth Road, Rochdale Road and Stainland Road at key times, this plan would just exacerbate these problems. Air Pollution - the increase in traffic will lead to an increase in air pollution, particularly affecting the elderly and young children, the latter of which attend the infants school located on Saddleworth Road below the sites included in the Plan. Infrastructure - The local School, GP and Dentist have no capacity to service the increased number of residents the Plan will create. There would need to be significant investment in Infrastructure however there is no provision in the Infrastructure Delivery Plan for the expansion of primary school places in Greetland and only an additional 75 secondary school places which is totally inconsistent with the NPPF guidelines. According to the Council's own analysis in its review of the Calderdale Green Belt in 2017 Plot LP0026 performed well in three of its five key purposes of Green Belt as identified in the NPPF. These are to check the unrestricted sprawl of large built up areas, to prevent neighbouring towns merging into one another and to assist in safeguarding the countryside for encroachment. It states that Green Belt have a positive role to play in fulfilling six objectives of which this plot meets five of them, so why has this plot been included in the Plan? The council has failed to provide evidence as follows: Building houses on this plot would extend the built up area of Greetland and undermine the objectives of the Green Belt. It would also contribute to the

extension of Greetland towards Barkisland compromising Greetland as a Community, thus creating Urban Sprawl! Due to the nature of this parcel of land the Council concede that a hydrological assessment would be needed prior to any development. The site is poorly drained, is wet even in the height of summer and has a number of springs which flow through it. The installation of SUDS and green roofs is unlikely to compensate for the loss of agricultural pasture. If this land were developed it would promote water run off into Black Brook and increase flooding frequency, exacerbating the problems that we usually endure and have recently seen in our area due to Storm Ciara and Dennis. The Council's own Infrastructure Delivery Plan states 'effective flood risk management is achieved partly by avoidance of inappropriate development in high risk zones'. Recently even the Prime Minister has stated that there should be no building on Green Belt Flood Risk areas. All the trees in LP0026 have tree protection orders on them, the wildlife in particular the bats would suffer as a result of this development. We do not agree with the Council's assessment that the ecological damage would be acceptable! Large open spaces are needed for the mental and physical health and well being of all, urban sprawl has many negative consequences for residents and the environment. It states the access to this site LP0026 would be from Scar Bottom Lane. There is an existing gate in to the field which currently my neighbours and I have shared access over. If the proposals go ahead and over 60 houses are built on this site then approximately 60 to 120 cars will be using this access which is unacceptable as it is only a car width. Another access should not be opened into Scar Bottom Lane, it would not cope with the increased traffic! Highways - The Council in its draft Infrastructure Delivery Plan it states 'There is no need to provide improvements to the West Vale junction.' I do not know how they have come to this conclusion. The current traffic problems encountered in this area cause a huge bottle neck of traffic at key times, the traffic lights are currently running at 117% and the maximum they should be running at is 93%! How can the plan to add 600 houses to Saddleworth Road not require improvements? Environmental Health - The Council claims it will mitigate against the environmental impact of increased Noise and Air Pollution but does not state how it will do this!

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

Duty to Co-operate Reason:

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

Suggested Modifications:

In order for the Local Plan to be sound, LP0026 should be excluded from the plan and kept as Green Belt.

Comments:

Additional Evidence Link:

Comment ID **HRU916**

Site ref (if applicable): **LP0026**

Person ID: **1243616**

Name: **mrs CLIVE mcfadzean**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

There were no working party meetings ahead of the Councils Cabinet Meeting of 4th October 2019 at which the decision to increase the housing numbers was made. The local Councillors were therefore prevented from discussing the issues ahead of the cabinet meeting. The local Plan does not address the implications of the National Planning Policy Framework, especially NPPF Para 177 and the associated PPG in the sustainability of Greenbelt Sites. For example under this site assessment it shows out of 17 sustainability assessments, this allocation has 10 uncertain and 1 negative Assessment. The council has failed to differentiate between housing need and requirement as it has not evidenced its economic and employment growth forecasts. The plan has a grossly disproportionate emphasis on the Greetland community, with the 600 proposed houses off Saddleworth road. This is neither fair, reasonable or a balanced share to Greetland's size. The plan would create Urban Sprawl in our area which would have many negative consequences for Residents, Local Businesses and the environment. Such as: Traffic - We already have a traffic congestion issue on Saddleworth Road, Rochdale Road and Stainland Road at key times, this plan would just exacerbate these problems. Air Pollution - the increase in traffic will lead to an increase in air pollution, particularly affecting the elderly and young children, the latter of which attend the infants school located on Saddleworth Road below the sites included in the Plan. Infrastructure - The local School, GP and Dentist have no capacity to service the increased number of residents the Plan will create. There would need to be significant investment in Infrastructure however there is no provision in the Infrastructure Delivery Plan for the expansion of primary school places in Greetland and only an additional 75 secondary school places which is totally inconsistent with the NPPF guidelines.

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

Sound Reason:

The council has failed to differentiate between housing need and requirement as it has not evidenced its economic and employment growth forecasts. The plan has a grossly disproportionate emphasis on the Greetland community, with the 600 proposed houses off Saddleworth road. This is neither fair, reasonable or a balanced share to Greetland's size. The plan would create Urban Sprawl in our area which would have many negative consequences for Residents, Local Businesses and the environment. Such as: Traffic - We already have a traffic congestion issue on Saddleworth Road, Rochdale Road and Stainland Road at key times, this plan would just exacerbate these problems. Air Pollution - the increase in traffic will lead to an increase in air pollution, particularly affecting the elderly and young children, the latter of which attend the infants school located on Saddleworth Road below the sites included in the Plan. Infrastructure - The local School, GP and Dentist have no capacity to service the increased number of residents the Plan will create. There would need to be significant investment in Infrastructure however there is no provision in the Infrastructure Delivery Plan for the expansion of primary school places in Greetland and only an additional 75 secondary school places which is totally inconsistent with the NPPF guidelines. According to the Council's own analysis in its review of the Calderdale Green Belt in 2017 Plot LP0026 performed well in three of its five key purposes of Green Belt as identified in the NPPF. These are to check the unrestricted sprawl of large built up areas, to prevent neighbouring towns merging into one another and to assist in safeguarding the countryside for encroachment. It states that Green Belt have a positive role to play in fulfilling six objectives of which this plot meets five of them, so why has this plot been included in the Plan? The council has failed to provide evidence as follows: Building houses on this plot would extend the built up area of Greetland and undermine the objectives of the Green Belt. It would also contribute to the extension of Greetland towards Barkisland compromising Greetland as a Community, thus creating Urban Sprawl! Due to the nature of this parcel of land the Council concede that a hydrological assessment would be needed prior to any development. The site is poorly drained, is wet even in the height of summer and has a number of springs which flow through it. The installation of SUDS and green roofs is unlikely to

compensate for the loss of agricultural pasture. If this land were developed it would promote water run off into Black Brook and increase flooding frequency, exacerbating the problems that we usually endure and have recently seen in our area due to Storm Ciara and Dennis. The Council's own Infrastructure Delivery Plan states 'effective flood risk management is achieved partly by avoidance of inappropriate development in high risk zones'. Recently even the Prime Minister has stated that there should be no building on Green Belt Flood Risk areas. All the trees in LP0026 have tree protection orders on them, the wildlife in particular the bats would suffer as a result of this development. We do not agree with the Council's assessment that the ecological damage would be acceptable! Large open spaces are needed for the mental and physical health and well being of all, urban sprawl has many negative consequences for residents and the environment. It states the access to this site LP0026 would be from Scar Bottom Lane. There is an existing gate in to the field which currently my neighbours and I have shared access over. If the proposals go ahead and over 60 houses are built on this site then approximately 60 to 120 cars will be using this access which is unacceptable as it is only a car width. Another access should not be opened into Scar Bottom Lane, it would not cope with the increased traffic! Highways - The Council in its draft Infrastructure Delivery Plan it states 'There is no need to provide improvements to the West Vale junction.' I do not know how they have come to this conclusion. The current traffic problems encountered in this area cause a huge bottle neck of traffic at key times, the traffic lights are currently running at 117% and the maximum they should be running at is 93%! How can the plan to add 600 houses to Saddleworth Road not require improvements? Environmental Health - The Council claims it will mitigate against the environmental impact of increased Noise and Air Pollution but does not state how it will do this!

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

Duty to Co-operate Reason:

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

Suggested Modifications:

Exclude LP0026 from the Local Plan. Save our Green Belt and prevent West Vale becoming another Mytholmroyd!

Comments:

Additional Evidence Link:

Comment ID **HRU918**

Site ref (if applicable): **LP0026**

Person ID: **1243618**

Name: **Mr Sheldon McFadzean**

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. For example under this site assessment it shows out of 17 sustainability assessments, this allocation has 10 uncertain and 1 negative Assessment. There were no working party meetings ahead of the Councils Cabinet Meeting of 4th October 2019 at which the decision to increase the housing numbers was made. The local Councillors were therefore prevented from discussing the issues ahead of the cabinet meeting.

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

Sound Reason:

It appears that the plan has a grossly disproportionate emphasis on the Greetland community, with the 600 proposed houses off Saddleworth road. This is neither fair, reasonable or a balanced share to Greetland's size. The plan would create Urban Sprawl in our area which would have many negative consequences for Residents, Local Businesses and the environment. For Example: Traffic - We already have a traffic congestion issue on Saddleworth Road, Rochdale Road and Stainland Road, this plan would just exacerbate these problems. Air Pollution - the increase in traffic will lead to an increase in air pollution, particularly affecting the elderly and young children. Infrastructure -The local School, GP and Dentist have no capacity to service the increased number of residents the Plan will create. There is no provision in the Infrastructure Delivery Plan for the expansion of primary school places in Greetland and only an additional 75 secondary school places which is totally inconsistent with the NPPF guidelines. Why has this plot been included in the Plan? According to the Council's own analysis in its review of the Calderdale Green Belt in 2017 Plot LP0026 performed well in three of its five key purposes of Green Belt as identified in the NPPF. These are to check the unrestricted sprawl of large built up areas, to prevent neighbouring towns merging into one another and to assist in safeguarding the countryside for encroachment. It states that Green Belt have a positive role to play in fulfilling six objectives of which this plot meets five of them! The council has failed to provide evidence as follows: Building houses on this plot would extend the built up area of Greetland, creating Urban Sprawl and undermining the objectives of the Green Belt. It would also contribute to the extension of Greetland towards Barkisland compromising Greetland as a Community. Due to the nature of this parcel of land the Council concede that a hydrological assessment would be needed prior to any development. The site is poorly drained, is wet even in the height of summer and has a number of springs which flow through it. The installation of SUDS and green roofs is unlikely to compensate for the loss of agricultural pasture. If this land were developed it would promote water run off into Black Brook and increase flooding frequency, exacerbating the problems that we usually endure and have recently seen in our area due to Storm Ciara and Dennis. The Council's own Infrastructure Delivery Plan states ' effective flood risk management is achieved partly by avoidance of inappropriate development in high risk zones'. Recently even the Prime Minister has stated that there should be no building on Green Belt Flood Risk areas. All the trees in LP0026 have tree protection orders on them, the wildlife in particular the bats would suffer as a result of this development. I do not agree with the Council's assessment that the ecological damage would be acceptable! Large open spaces are needed for the mental and physical health and well being of all, urban sprawl has many negative consequences for residents and the environment. It states the access to this site LP0026 would be from Scar Bottom Lane. There is an existing gate in to the field which currently my neighbours and I have shared access over. If the proposals go ahead and over 60 houses are built on this site then approximately 60 to 120 cars will be using this access which is unacceptable as it is only a car width. Scar Bottom Lane is extremely narrow, when the buses use this road it essentially becomes one way traffic only, the farmer is continuously rebuilding his stone boundary walls due to accidents on this length of road. Another access should not be opened into Scar Bottom Lane, it would not cope with the increased traffic! Highways - The Council in its draft Infrastructure Delivery Plan it states 'There is no need to provide improvements to the West Vale junction.' I do not know how they have come to this conclusion. The current traffic problems encountered in this

area cause a huge bottle neck of traffic at key times, the traffic lights are currently running at 117% and the maximum they should be running at is 93%! How can the plan to add 600 houses to Saddleworth Road not require improvements? Environmental Health - The Council claims it will mitigate against the environmental impact of increased Noise and Air Pollution but does not state how it will do this!

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

Duty to Co-operate Reason:

I have significant concerns about the way in which the process of producing the Local Plan has been conducted. Not enough effort has been made to communicate the process of the Local Plan to residents and raise awareness of the consultation. The Council has not made it clear what they will do to make the Plan compliant.

Suggested Modifications:

Exclude LP0026 from the Local Plan.

Comments:

Additional Evidence Link:

Comment ID **HRU919**

Site ref (if applicable): **LP0026**

Person ID: **1243617**

Name: **Mr Blaine McFadzean**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

1. The local Plan does not address the implications of the National Planning Policy Framework, especially NPPF Para 177 and the associated PPG in the sustainability of Greenbelt Sites. For example under this site assessment it shows out of 17 sustainability assessments, this allocation has 10 uncertain and 1 negative Assessment. 2. There were no working party meetings ahead of the Councils Cabinet Meeting of 4th October 2019 at which the decision to increase the housing numbers was made. The local Councillors were therefore prevented from discussing the issues ahead of the cabinet meeting.

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

Sound Reason:

Traffic & Highways - We already have a traffic congestion issue on Saddleworth Road, Rochdale Road and Stainland Road, this plan would just exacerbate these problems. The Council in its draft Infrastructure Delivery Plan it states 'There is no need to provide improvements to the West Vale junction.' I do not know how they have come to this conclusion. The current traffic problems encountered in this area cause a huge bottle neck of traffic at key times, the traffic lights are currently running at 117% and the maximum they should be running at is 93%! How can the plan to add 600 houses to Saddleworth Road not require improvements? Air Pollution - the increase in traffic will lead to an increase in air pollution, particularly affecting the elderly and young children, the later of which attend the infants school located on Saddleworth Road below the sites included in the Plan. Infrastructure - The local School, GP and Dentist have no capacity to service the increased number of residents the Plan will create. There would need to be

significant investment in Infrastructure however there is no provision in the Infrastructure Delivery Plan for the expansion of primary school places in Greetland and only an additional 75 secondary school places which is totally inconsistent with the NPPF guidelines. The plan has a grossly disproportionate emphasis on the Greetland community, with the 600 proposed houses off Saddleworth road. This is neither fair, reasonable or a balanced share to Greetland's size. The plan would create Urban Sprawl in our area which would have many negative consequences for Residents and the environment. The council has failed to differentiate between housing need and requirement as it has not evidenced its economic and employment growth forecasts. According to the Council's own analysis in its review of the Calderdale Green Belt in 2017 Plot LP0026 performed well in three of its five key purposes of Green Belt as identified in the NPPF. These are to check the unrestricted sprawl of large built up areas, to prevent neighbouring towns merging into one another and to assist in safeguarding the countryside for encroachment. It states that Green Belt have a positive role to play in fulfilling six objectives of which this plot meets five of them, so why has this plot been included in the Plan? The council has failed to provide evidence as follows: Building houses on this plot would extend the built up area of Greetland and undermine the objectives of the Green Belt. It would also contribute to the extension of Greetland towards Barkisland compromising Greetland as a Community, thus creating Urban Sprawl! Due to the nature of this parcel of land the Council concede that a hydrological assessment would be needed prior to any development. The site is poorly drained, is wet even in the height of summer and has a number of springs which flow through it. The installation of SUDS and green roofs is unlikely to compensate for the loss of agricultural pasture. If this land were developed it would promote water run off into Black Brook and increase flooding frequency, exacerbating the problems that we usually endure and have recently seen in our area due to Storm Ciara and Dennis. The Council's own Infrastructure Delivery Plan states ' effective flood risk management is achieved partly by avoidance of inappropriate development in high risk zones'. Recently even the Prime Minister has stated that there should be no building on Green Belt Flood Risk areas. All the trees in LP0026 have tree protection orders on them, the wildlife in particular the bats would suffer as a result of this development. We do not agree with the Council's assessment that the ecological damage would be acceptable! Large open spaces are needed for the mental and physical health and well being of all, urban sprawl has many negative consequences for residents and the environment. It states the access to this site LP0026 would be from Scar Bottom Lane. There is an existing gate in to the field which currently my neighbours and I have shared access over. If the proposals go ahead and over 60 houses are built on this site then approximately 60 to 120 cars will be using this access which is unacceptable. There is nothing in the Councils Infrastructure delivery Plan that will address this issue. Environmental Health - The Council claims it will mitigate against the environmental impact of increased Noise and Air Pollution but does not state how it will do this!

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

Duty to Co-operate Reason:

The Council has not made it clear what they will do to make the Plan compliant. I have significant concerns about the way in which the process of producing the Local Plan has been conducted. Not enough effort has been made to communicate the process of the Local Plan to residents and raise awareness of the consultation.

Suggested Modifications:

Exclude LP0026 from the Local Plan.

Comments:

Additional Evidence Link:

Comment ID **HRU925**

Site ref (if applicable): **LP0026**

Person ID: **1243715**

Name: **Mr Timothy Wallace**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

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

Sound Reason:

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU931**

Site ref (if applicable): **LP0026**

Person ID: **1243724**

Name: **Miss Timothy Wallace**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

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

Sound Reason:

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU937**

Site ref (if applicable): **LP0026**

Person ID: **1243732**

Name: **mrs Kathryn Sutcliffe**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

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

Sound Reason:

LP0026, LP0177, LP0952 and LP1625 are so close in proximity that they should be viewed jointly as well as individually. They are all in the Greetland ward so why have they been recorded on this plan as Elland. Main points of objection 1: Flooding 2: Loss of green belt and impact on wildlife corridor 3: Air Pollution and Traffic 4: Infrastructure 5: Urban sprawl Flooding We have seen first-hand the devastation caused by the recent floods (Boxing Day 2015 and 8 th -9 th February 2020). Every proposed site flooded. The upland sites LP0026, LP0952 and LP0952 were rivers, the land already saturated by the vast amounts of natural springs this area has. The lower level part of LP0177 was indistinguishable from the river. The flood plains that these sites provide are critical and flood regularly ; soaking up excess water at times of rainfall, allowing space for the water to flow and be stored on open land in times of flood, even after the river has burst its bank, and protecting land further downstream from potential flooding. The development of this land will increase flood risk further downstream towards Westvale, Elland and Brighouse (Evidence of which can already be seen on Social media sites, Calendar and national news outlets). To develop on these sites would contradict the DEFRA plan and the NPPF. The DEFRA 25year plan states that "National flood management involves the use of a variety of measures including storing water on open land". NPPF 14 (157b) states that plans should work to safeguard land from development that is required or likely to be required for current and future flood management. The current policy and legislation on flooding states -

“due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere. Chapter 14, paragraph 163 of the NPPF states: -“ When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. It is abundantly clear that any development on these sites would directly oppose all these pieces of legislation and policies and would hugely increase the risk of flooding to both surrounding properties and the wider community in Greetland, West Vale and even as far as Elland. Any development of these sites and reduction in the capacity of these flood plains will only ensure that the flooding we now see will be more frequent and cause even more damage. This is not acceptable or fair therefore these sites should be removed from the local plan. Loss of Green Belt and Wildlife Corridor Calderdale's Green Belt Review map of 2020 clearly shows that all proposed sites in the Greetland ward are 'Most Sensitive Green Belt Parcels'! Does this mean the council disregards its own statements? Esther McVey, our current Housing Minister's written policy on Green Belt land states "protecting the Green Belt goes beyond protection against development" NPPF chapter 13 states that there are 5 purposes to green belt land- CMBC has already stated that this land strongly fulfils these 5 purposes. NPPF ch13 paragraph 143 states "Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances". Protecting the green belt is very important. To include these sites in the local plan goes against all the above policies and there is no evidence of any special circumstances to support development on this land. The sites are a wildlife habitat for many different species. CMBC has already stated that a constraint is that Black Brook running through LP0177 is a UK BAP priority habitat. NPPF Chapter 15 states that planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes and sites of biodiversity. It also states - to protect and enhance biodiversity and geodiversity, plans should: identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including wildlife corridors. Developing these sites will put this precious wildlife corridor and all its inhabitants at great risk directly opposing the NPPF legislation and the DEFRA 25 Year Plan. This site should therefore be removed from the local plan. Air Pollution and Traffic Congestion Air pollution and traffic congestion obviously go hand in hand. The junction of Saddleworth Road and Stainland Road in West Vale is already a bottle neck and far too congested and unable to cope with the traffic volume that passes through it on a daily basis. WSP Parsons Brinckerhoff Report on this Transport Network identifies that traffic congestion at the juncture of Stainland Road-Saddleworth Road would increase by approximately 105% traffic congestion at the juncture of Stainland Road-Rochdale Road would increase by over 100% Public Health England (PHE) (11th March 2019) reports that air pollution is the biggest environmental threat to health in the UK, with between 28,000 and 36,000 deaths a year attributed to long-term exposure. There is strong evidence that air pollution causes the development of coronary heart disease, stroke, respiratory disease and lung cancer, and exacerbates asthma. Professor Paul Cosford, Director of Health Protection and Medical Director at PHE, said: "Now is our opportunity to create a clean air generation of children Key interventions local authorities can take include redesigning cities so people aren't so close to highly polluting roads." Professor Cosford said: We recommend that at a local level, any new policy or programme of work which affects air pollution should aim to deliver an overall benefit to the public's health. Greetland School and Sunnybank Pre School are right on Saddleworth Road at the boundary of LP0177. The increase in traffic of over 100% and therefore pollution, that will be an outcome of development on this site ignores all the recommendations of PHE and put many people's health at risk especially that of our children which is totally unacceptable. Infrastructure Greetland Primary Academy, West Vale Primary School and Brooksbank High School are all full. With a proposed 600 houses, using Calderdale MBC's figure for school places of .36 per household (IDP section 9.14) this indicates another 206 school places would be needed. Where are these places to be found? Local Dentist has a waiting list of 600 for NHS places. The nearest NHS dentist was recently found (July 2019) 11 miles away in Kirklees. Local GP surgeries are already full. No plans have been put in place to cope with the expected population rise. Waiting times can already go beyond seven days and GP's are already pushed to 'breaking point'. Urban

Sprawl The following is from Calderdale Councils website regarding green belt land and urban sprawl: ' Green Belt - The functions of the Green Belt are to: check the unrestricted sprawl of large built-up areas; prevent neighbouring towns from merging into one another; assist in safeguarding the countryside from encroachment; preserve the setting and special character of historic towns; and assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. At what point do you stop building and filling in the gaps?

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

Duty to Co-operate Reason:

There are so many constraints and negatives to all these sites that cannot be adequately mitigated against. To develop these sites opposes so many policies, recommendations and pieces of legislation which CMBC appear to have given little or no consideration to.

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609510>

Comment ID **HRU941**

Site ref (if applicable): **LP0026**

Person ID: **1243746**

Name: **Mr Samuel Sutcliffe**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

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

Sound Reason:

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

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

approximately 105% traffic congestion at the juncture of Stainland Road-Rochdale Road would increase by over 100% Public Health England (PHE) (11th March 2019) reports that air pollution is the biggest environmental threat to health in the UK, with between 28,000 and 36,000 deaths a year attributed to long-term exposure. There is strong evidence that air pollution causes the development of coronary heart disease, stroke, respiratory disease and lung cancer, and exacerbates asthma. Professor Paul Cosford, Director of Health Protection and Medical Director at PHE, said: "Now is our opportunity to create a clean air generation of children Key interventions local authorities can take include redesigning cities so people aren't so close to highly polluting roads." Professor Cosford said: We recommend that at a local level, any new policy or programme of work which affects air pollution should aim to deliver an overall benefit to the public's health. Greetland School and Sunnybank Pre School are right on Saddleworth Road at the boundary of LP0177. The increase in traffic of over 100% and therefore pollution, that will be an outcome of development on this site ignores all the recommendations of PHE and put many people's health at risk especially that of our children which is totally unacceptable. Infrastructure Greetland Primary Academy, West Vale Primary School and Brooksbank High School are all full. With a proposed 600 houses, using Calderdale MBC's figure for school places of .36 per household (IDP section 9.14) this indicates another 206 school places would be needed. Where are these places to be found? Local Dentist has a waiting list of 600 for NHS places. The nearest NHS dentist was recently found (July 2019) 11 miles away in Kirklees. Local GP surgeries are already full. No plans have been put in place to cope with the expected population rise. Waiting times can already go beyond seven days and GP's are already pushed to 'breaking point'. Urban Sprawl The following is from Calderdale Council's website regarding green belt land and urban sprawl: 'Green Belt - The functions of the Green Belt are to: check the unrestricted sprawl of large built-up areas; prevent neighbouring towns from merging into one another; assist in safeguarding the countryside from encroachment; preserve the setting and special character of historic towns; and assist in urban regeneration, by encouraging the recycling of derelict and other urban land'.

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

Duty to Co-operate Reason:

Under the Localism Act 2011, Section 33A "Duty to co-operate in relation to planning of sustainable development", Paragraph 3 lays out the duties required of the local council of which points a and b require preparation of local plans. Point d however calls for "activities that can reasonably be considered to prepare the way for activities within any of paragraphs (a) to (c) I question if Calderdale has sufficiently carried out all activities needed to form a sustainable local plan with specific reference to show that release of Green Belt in LP26, LP177, LP952 and LP1625 meets exceptional circumstances?: - i.e. has all brownfield been explored as per NPPF paragraph 137? Has land recently regraded to brownfield on LP177 at the end of Ellistones Lane, and pending vacation of the Freudenberg factory now up for sale) been considered? It is CPRE's view after meeting local residents that they consider these brownfield sites broadly positive. - I also question if there has been adequate exploration of infrastructure requirements and mitigation for a 33.8% growth in a community? -The council has provided a Sustainability Appraisal Report. However, under preferred Option 4, 9 of the 17 objectives analysed have been marked as - "uncertain" Impact. I question how fully the necessary 'activities' needed to form a sustainable plan have been carried out? e.g. risk assessment and necessary mitigation. How can a plan be sustainable and Green Belt destroyed when there are so many question marks?

Suggested Modifications:

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

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609529>

Comment ID **HRU946**

Site ref (if applicable): **LP0026**

Person ID: **1243763**

Name: **Miss Gillian Reid**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Having lived in Greetland since birth (now aged 36) I have seen many changes in our village over the years. None of which I have ever felt compelled to write an official objection to up until now. After seeing the plans LP0026 (The Gate Farm) I am shocked to hear along with other plans LPO952, LP0177 AND LP1625 the enormous amount of building work being planned for such a small, beautiful village. If these plans are to proceed, I feel our local area will become completely unrecognisable as the small and beautiful village we once were. Please find below the reasonings behind my strong objections to this. The reasons are vast so for ease I have split the factors into the following categories: 1.Environmental 2.Economic 3.Social

Environmental The plans for LP0026 along with LP0952, LP0177 and LP1625 all cover our valuable Greenbelt land in Greetland. This land is classified as a 'most sensitive' greenbelt, please find evidence of this in the following link to the Councils Greenbelt Review: https://calderdale.gov.uk/v2/maps/green-belt-review?fbclid=IwAR0-YtEHRsU5_gSN2JMA4zPU97P0GPsWU0_lq263NGHjCx4_m66ibHv8vaQ I simply can not see how the amount of proposed building work (600 homes through the 4 aforementioned sites) can possibly be justified on this beautiful Greenbelt land. This land provides a wildlife corridor, contains a public right of way and reduces the flood potential of not only our own local area but for those downstream of us and is meant to include prevention of urban sprawl. To build on this land will destroy all of these benefits this Greenbelt area offers to both the wildlife and the local community. The Department for Environment, Food and Rural Affairs' (DEFRA) 25-year plan states ' we will protect ancient woodlands and grasslands, high flood risk areas and our best agricultural land' . To build on this site would go be going directly against this statement. There is plenty of wildlife to be seen in and around L0026, this plan would take away their natural habitat which is crucial to their survival, how can we justify taking away these species homes when we have already taken so much from them and are not doing enough with the land we have already taken. In June 2016 The CMBC published their Local Risk Management Strategy. This document states -"It is the local flood risk management strategy's main objectives to take steps to reduce flood risks in Calderdale" One of the ways they proposed to do this was to -"develop a land management strategy that will potentially reduce upland runoff" The proposed building on any of the Greenbelt land will only exacerbate any runoff and flooding on lower lying land and further down the valley i.e. West Vale and Elland. We only have to look at our surrounding areas and effects that floods have on them. For example, Sowerby Bridge and Hebden Bridge. I fear that this development will cause similar tragic situations where businesses and homes of local residence are ruined with the clean-up/prevention bill costing millions. Why would we want to add to this problem when we are working so hard to find solutions to it in other local communities. Our natural land is already preventing this from becoming a problem for many, why not let this continue? Storm Ciara struck Calderdale with further flooding on 09/02/20 flooding

many of the same places as Boxing Day 2015, this is evidence that the area floods more frequently than 'once a century'. The flood plains in this area did their job by decelerating the flow of water down the valley, I dread to think of the outcomes had this land been built on at the time. The CMBC Flood strategy was born following the Boxing Day floods of 2015. Calderdale was the worst affected borough in the UK. Greetland saw localised flooding all along the flood plain (sites LP0952 and LP0177) and the Black Brook. The houses on Woodfield Drive were affected. Multiple sites in West Vale were affected and further downstream the Elland Bridge collapsed and with that a massive £4 million repair bill. Building on our Greenbelt land will only lead to worse flash flooding as this land helps slow the flow of water to the main watercourses. Current legislation on building on flood risk areas can be found here: <http://www.environmentlaw.org.uk/rte.asp?id=105> This contains the following quote 'new development in the flood risk areas would only be allowed when it is exceptionally necessary' I find it very hard to believe it to be 'exceptionally necessary' to build 600 homes in this space when there are plenty of other areas of either brownfield or less sensitive to flooding which can be considered first. A quick look at the website Right Move will show you there are approx. 600 homes for sale within a 3-mile radius of these sites. Whilst these homes are available for anyone wishing to move to the area why is it 'exceptionally necessary' that we build 600 more? To me this only indicates that the demand for houses in this area may not be as high as perceived by CMBC and therefore we do not need to develop on any more of our precious land. Economic As of 31/01/20 the UK is in a Brexit transition period, leaving us with uncertainty for our future economic prospects. The plans for LP0026 and the other 3 mentioned sites have been proposed prior to Brexit and the forecast on population growth rates. This means the plans are already out of date as until this transition period is complete and we know more about our relationship with Europe and the rest of world how can we know how many new homes we may or may not see a need for? Would it not be better to put these plans on hold until we know the outcomes and needs, instead of building for the sake of building? The current roads around Greetland already struggle with the amount of traffic seen through the village and into the already chronic traffic issues of Westvale. Adding a further 600 homes to this already growing problem is only going to make matters worse. I can't even begin to imagine what another potential 600+ cars going through west vale would look like, other than just a complete standstill. The daily struggle to get in and out of Greetland especially at peak times will only be added to. At peak times of school drop off and pick up Saddleworth Road already becomes an absolute nightmare, I'm not sure how the road would physically cope with even more children needing access this school site. The number of vehicles in the road space along with the terrible parking that often occurs around school pick up zones is already an accident waiting to happen, do we really need to add to the danger by adding even more people to the mix? Also, with the added traffic spending much more time standing still with lengthy delays this will all contribute to poor air quality especially around our schools. Is this really what we think will be best for our local children? The area already struggles with the condition of the local roads with the current level of traffic. Why are we not addressing these problems before adding to them? If the council's budget for road maintenance can not stretch to repairing the damage by the current level of traffic where is the sense in adding a further 600+ cars to the road? With a lack of capacity for NHS dentists in the area, adding a further 600 homes is only going to increase the number of people with poor oral health due to lack of local availability. There will also be a strain on the local GP surgeries where it is already difficult to get an appointment for many. Social This greenbelt land gives people chance to enjoy nature whilst contributing to both their physical and mental wellbeing. Surely taking away part of these stunning surroundings will have a negative impact on the health and quality of life of those who enjoy it regularly. The air will be more polluted, stress and anxiety levels will increase due to fear of further flooding, and there will be an increase in hospital admissions due to insufficient numbers of GP appointments.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU957**

Site ref (if applicable): **LP0026**

Person ID: **1243806**

Name: **mr andrew jackson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609636>

Comment ID **HRU966**

Site ref (if applicable): **LP0026**

Person ID: **1241940**

Name: **Mrs Goda Pateman**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

were they not analysed thoroughly enough so as to give a conclusive answer? The statement ' UNCERTAIN impact' covers both of the above scenarios. This does not add to clarity.

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

Sound Reason:

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

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

Duty to Co-operate Reason:

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

Suggested Modifications:

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

Comments:

Additional Evidence Link:

Comment ID **HRU971**

Site ref (if applicable): **LP0026**

Person ID: **1228589**

Name: **Mrs Debbie Chew-Moulding**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

The NPPF states -“Once established Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified , through the preparation or updating of plans.”“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy: a) makes as much use as possible of suitable brownfield sites and underutilised land; Has this been fully exhausted? b) optimises the density of development, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport Has this been fully exhausted in already allocated housing sites within the borough, can this be increased? c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground. Has this occurred? The reasons for additional housing is due to the economic strategy and increase in economic growth? Can additional sites be accommodated in neighbouring authorities as part of the Leeds City Region approach? Does the economic strategy need to be revised and updated as a result of Brexit and therefore would there be a need for additional development on this Greenbelt site? The inspector acknowledges that the -“relationship between employment growth and new housing is complex.-“ Turely's report (2019) on -“Modelling the economic implications of the proposed housing requirement Calderdale Council” contributes to how the labour force is assumed to behave, however, it does not appear to have considered accommodating the housing in neighbouring authorities. It is felt that the Council has not fully exhausted all options in order to prevent development on Green Belt land. When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport . The site reports states the land "has relatively good access to a range of services and facilities, although it is beyond 2km to the nearest railway station". The Council use of terminology "relatively" does not co-incide with the NPPF guidance that the site is -“ well served by public transport.”It is also emphasised that this land has not been previously developed. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open ; the essential characteristics of Green Belts are their openness and their permanence. The 5 key Purposes of Green Belts as the following: to check the unrestricted sprawl of large built-up areas; The site is a large area of greenfield land, which will contribute to the sprawl of the existing built up area. to prevent neighbouring towns from merging into one another; to assist in safeguarding the countryside from encroachment; (Development of the greenfield land will lead to a loss of Grade 3 Agricultural land, which is currently used and is of 'good to moderate' quality of land). to

preserve the setting and special character of historic towns; and, to assist in urban regeneration, by encouraging the recycling of derelict and other urban land (The sites proposed are Greenfield) It is considered that allocation of this site for development is not consistent with the guidelines in the NPPF.

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

Duty to Co-operate Reason:

Suggested Modifications:

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

Comments:

Additional Evidence Link:

Comment ID **HRU972**

Site ref (if applicable): **LP0026**

Person ID: **1243813**

Name: **Mr Andrew Sumner**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Does not comply with the NFPP

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

Sound Reason:

Green Belt should be protected at all costs. It is home to so much protected wildlife, we should not be considering building and disrupting their home life! Flood plain - the whole area is a natural flood plain and should be left to drain naturally so as not to add additional flooding to the lower valley, ie West Vale, Elland and Brighouse. Pollution - it's outrageous to consider adding further pollution to an area where pollution levels are already high. Infrastructure - schools are already bursting at the seams as are the local doctors and dentists! West Vale will not cope with the increase in volume of traffic as it's already a nightmare to drive through.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU980**

Site ref (if applicable): **LP0026**

Person ID: **1243601**

Name: **Mr Mark Connett**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

No The proposal for the LP0026 fails to acknowledge many planning guidelines and/or advice given on environmental & social factors. Upon reading the national policy planning framework, I have found many points that contradict what the council is aiming to keep/put in place, the main one I believe is below. Proposals affecting the Green Belt Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are: a) buildings for agriculture and forestry; b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it; c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces; e) limited in filling in villages; f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: "" not have a greater impact on the openness of the Green Belt than the existing development; or "" not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority. To the best of my knowledge the council have failed to notify those closest to the site aware they were even added back in into the plan way back in 2017 I don't believe social media and word of mouth should be the way for the local people to find out. I feel it's a lack in communication at the very least.

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

Sound Reason:

No Flooding -Calder Valley is well known for flooding let alone the site in question which naturally takes a lot of the surface water that flows from the higher parts of Greetland. The proposal does not meet national policy. The NPPF states that "Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere". The recent floods we had on In February of 2020 only strengthen the point I am trying to make. We are constantly having interruption on our road network by the council having to continually maintain and repair the water system, the water going into these drains as a result of the flood plain being destroyed, this would put even more pressure on this, leading to more roadworks and even greater congestion. Clean Air Policy ; The sheer quantity of houses proposed on this site would mean far higher emissions and air pollution in west vale, on commutes to and from Halifax and beyond. Calderdale Council

have declared a climate emergency yet are potentially willing to release greenbelt land with the intention to build a large amount of houses whilst destroying the natural benefits of the trees absorbing and storing the Carbon dioxide that we are creating. This site is also directly surrounding a preschool and the key stage 1 site of The Greetland Academy. Saddleworth Road is already a hugely congested road and that's before development of more houses that would use this road. From September 2020 I will have a child at each of these schools so I feel very passionate about how the children attending these schools will be directly affected from the decline in air quality around them for up to 7 hours a day. The proposition that this site allocation is where they spend most of their time seems highly unjustified when there are many other places in Calderdale more suited. The Green Belt - Loss of large area of Green Belt and Wildlife Corridor The NPPF states that When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused on these grounds alone this site should be removed from the local plan. The Wildlife Corridor has a well-used public footpath that travels the whole length of the proposed Local Plan build site, as well as this the area is home to wild deer, foxes, squirrels, field mice, barn owls, kingfisher and much more. The brook itself is a healthy natural water-course with a thriving population of wild brown trout. Taking away something so natural and therapeutic that benefits local people by getting in touch with nature and to get children out into open spaces should be the last resort and with so many brownfield sites still available I believe this goes against many of the policies on the NPPF. A report recently submitted to the Adult Health & Social Care Scrutiny Board stating the need to retain Green Spaces for the Health and Wellbeing of Calderdale residents. This report was submitted by the Head of Planning. (This report is on Calderdale MBC's Website) Infrastructure - The road network in Greetland is already at breaking point on a good day, let alone when we have endless amounts of roadworks to contend with. the roads simply cannot take the proposed number of cars which all of these houses would bring with them. it takes me a good 20 minutes to do a 0.6 mile journey to the motor way on a morning. Both The Greetland Academy and West Vale Primary are full to capacity, as well as the feeder high school Brooksbank. Stainland Road Medical Centre would also struggle to attend to the additional patients this would bring with it, the local dentist has a 600 place waiting list for NHS patients. Allocation of land - I fail to understand why Greetland, Elland & Stainland have been grouped together, I believe this to be a deliberate attempt to mask the disproportionate quantity of building works being allocated to Greetland. while other wards have no sites added to the local plan. I believe this be disproportionate to the Greetland area, put that together with them all on one road and it's ridiculous. LP0026, LP0177, LP0952 and LP1625 are all on Saddleworth Road. Greetland is a community in its own right. Greetland is HX4 and a village whereas Elland is HX5 and a town I don't think we shouldn't be grouped together. The government requires land for the local plan to be designed in the whole of Calderdale there is no requirement to assign housing to an area that has such high flood risk, let alone land that routinely floods which will only become more frequent through climate change. density of houses could be increased in areas where land is not susceptible to flooding. Boris Johnson has called for councils to stop building on flood plains as well as the new SoS for Env. George Eustice has also pointed to this being a long term problem on them grounds alone this site along with LP0026, LP1625 & LP0952 should be removed from the local plan due to long term flooding.

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

Duty to Co-operate Reason:

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

Suggested Modifications:

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

Comments:

Additional Evidence Link:

Comment ID **HRU988**

Site ref (if applicable): **LP0026**

Person ID: **1243824**

Name: **miss zoe pickles**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

A total lack of consultation prior to formulating the LP for the inspector. As a resident of Greetland and one that lives adjacent one of the the sites I have received no notification of such planning. My only means of being informed was via word of mouth in the community. Surely this is not the way such a significant development should be found out about?

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

Sound Reason:

Air pollution: There would be a significant increase in traffic on roads that already badly congested. Public transport is not sufficient in the area to suggest the majority of new residents would not be adding to the congestion. This is especially concerning given the proximity of Greetland Academy and the number of children that would be badly affected by such pollution in addition to the noise pollution. Flooding - I don't even feel that this needs commenting on. You would have to be a fool to build on land that is currently a floodplain or land that helps intercept rainwater from lower in the valley. This land has struggled in recent weeks to cope with the rainwater. With climate change contributing to more and frequent rain this situation will only get worse especially if this land is build on. Infrastructure: As mentioned above the public transport is not adequate for the area. People would be using one road in and out. Local schools are over subscribed which would mean parents driving further distances to take children to their school and back. All doctor surgeries are full. The infrastructure in the area simply can't cope with any additional housing of the proposed scale. Most new housing in this area is not affordable to locals. Rather those that are commuting to larger near by cities take up resident thus adding even more congestion.

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

Duty to Co-operate Reason:

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

Suggested Modifications:

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

Comments:

Additional Evidence Link:

Comment ID **HRU996**

Site ref (if applicable): **LP0026**

Person ID: **1241730**

Name: **Mrs S Hirst**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

In my opinion the Council have failed to meet its three core principals of Community Involvement namely, Clarity, Inclusivity and Integrity. If it was not for the support of the local community many people would be unaware that the sites have been put back into the Local Plan and that a further consultation period has been made. Exactly what is expected of the general public is also unclear. Phrases such -“Is this Sound” have very little meaning to general public. The use of acronyms, legal and planning -“jargon” make the plan far from user friendly. 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. Removal of this Green Belt land could, set the precedence for removing even more of the land from the Green Belt and for development to take place all along the valley. Any development of this Green Belt area would have a major impact on the landscape and dramatically change the character of the locality forever. The development of this area would also mean a considerable loss of Open Space. The Council have stated in their report that removal of this land would have -“no loss/no impact” on the area. There seems to be no consideration that taking the Saddleworth Road Development as a whole, would mean a loss of nearly 25 hectares of open Green space which would have a detrimental effect on the local community. The area is regularly used by walkers, cyclists, horse riders and families. The area is becoming even more popular due to a number of initiatives by the owners of the industrial plant. The site has a public right of way to the west of it. Whilst the developers have stated that this will be retained, it does not take into account what effect the development would have on the character and tranquillity of this area. Walking through a housing estate is not the same as walking through untouched green belt fields.

FLOODING The fields within this site all provide land for the run off from the Moorland at the top of the valley. This is clearly demonstrated when we have heavy rain fall. Building on top of this natural soak away would leave no where for the rainfall to collect. Whilst the developers may well be able to drain the sites successfully there appears to be not account taken of where that water will then go and what potential that has for flooding elsewhere in the valley. Given the recent catastrophic flooding the area experienced on February 9 th this year ; the second time in less than 4years, greater care needs to be paid to the building on flood plains and natural soak always.

ENVIRONMENTAL HEALTH The creation of so many houses is going to have a large impact on the amount of pollution created. The development, across all the sites on Saddleworth road, has the protentional to add over 1000 cars to the road. Currently pollution figures are not collected for Saddleworth Road due to -“its open nature” allowing pollution to disperse. However, this natural -“escape route” will be eroded if this considerable area of land is developed. Currently traffic can be cued nearly half a mile up Saddleworth Road waiting to get through the traffic lights in West Vale. The possibility of an increase in cars will mean more cars on the roads, with more engines idling and pumping out more pollution. This is particularly worrying due to the local infant school being next to the road. Monthly Pollution readings for West Vale obtained from 2019 Air Quality Annual Status Report show that these monthly readings regularly exceed the 40mg/ limit, which has been set by the Council. More traffic will only increase these numbers which will be against their own targets.

INFRASTRUCTURE The MP for Calderdale 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 is unusual in that it split over two sites which are approximately half a mile apart. The intake is based on the proximity to the school site on Saddleworth Road. With the increase in housing on this road it could potentially mean that children living next to the School on Rochdale road could not secure a place. Potentially it could mean parents having to drive their children to schools away from the village thus adding to the congestion and pollution. The public transport is very limited, buses to Halifax run once every hour, do not operate in an evening and have limited service at a weekend. The buses frequently miss and consequently you are unable to rely on them as a means of commuting to work. The main concern though is how the increase in traffic will impact on the area and the lack of any foresight as to what impact this have. The Site Report states that -“Mitigation measures are likely to be required at the Stainland and Saddleworth road Junction” however it does not detail what

the -“mitigation” will be. Whilst the Infrastructure plan gives details of local road -“improvements” which are due in this area, they are not of a scale which help alleviate the congestion at this junction. It is also worthwhile noting that the M62 has just undergone extensive works to make it a -“smart motorway” which should help reduce congestion. However further schemes to convert areas to -“smart motorways” is now on hold pending Government review into its safety. Using the Sustainability Appraisal Report it can be seen that this site has 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:

Suggested Modifications:

Comments:

Additional Evidence Link:

Main Issues and Council Response

Legal Compliance

Main Issues:

1. The proposal does not meet NPPF para 177.
2. The Plan has not been prepared in line with the Statement of Community Involvement, and there has been very little consultation with local residents. Some supporting information was not available during the consultation period. No opportunity for local councillors to discuss increasing the housing requirement.
3. Question whether the Sustainability Appraisal has been prepared properly or used effectively
4. Unnecessary and unsustainable to build homes on this site - traffic congestion, flooding and air pollution.
5. Development will increase flood risk, including from underground springs, and increasing flood risk downstream. The Plan does not comply with NPPF in this regard. No reference to flood mitigation. Poor drainage. Complex water system with natural springs. Site is a natural and essential soak away. The Plan does not comply with current policy and legislation on flooding. Clay soil in the area make SuDS unsuitable. The land is a flood plain. Houses should be directed to areas at lower risk of flooding.
6. Council should demonstrate that brownfield sites have been considered. The Brownfield Register is dated 2018.

7. No legal justification for releasing land from Green Belt. Objectively assessed need does not amount to exceptional circumstances. Council should not release unacceptable sites to meet a housing target. Lack of exceptional circumstances. Result in urban sprawl.
8. The site is home to protected species, a designated Wildlife Corridor and conflicts with the Wildlife and Countryside Act 1981 and other Regulations regarding countryside and wildlife.
9. Cumulative impact of development. Unfair distribution/disproportionate amount of development in Greetland.
10. Air pollution.
11. Loss of Green Belt, open space and countryside cannot be mitigated against.
12. The housing requirement should be revisited in light of Brexit and changing economic circumstances.
13. Council has failed to demonstrate that development will not negatively effect existing communities.
14. These plans are not in the spirit of Calderdale Vision 2024.
15. Local road network - congestion and capacity, particularly at West Vale. Highways England suggest site should be brought forward after completion of RIS scheme. No assessment has been undertaken of the local road network.
16. No sound reasons why this site has been reintroduced at this stage.
17. The Plan fails to comply to the overarching principles of the NPPF.
18. Development of the site would have a constraining effect on any expansion plans for the adjacent Sia Fibral/Bosch site.
19. Development of the site will have a negative impact on mental health.
20. Infrastructure - Lack of/pressure on existing amenities, services and facilities in the local area, e.g. schools, shops, doctors, public transport, utilities.
21. Disproportionate level of development in Greetland.
22. The presence of a housebuilder or developer on board should not be a reason to select a site for allocation.
23. Loss of right of way.

Council's Response:

1. It is not clear in what regard the Local Plan does not meet para 177 NPPF. The plan has been drawn up following the NPPF and the regulatory framework.
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. This issue has been responded to under 'Soundness'.
4. These issues have been responded to under 'Soundness'.
5. These issues have been responded to under 'Soundness'.
6. This issue has been responded to under 'Soundness'.
7. These issues have been responded to under 'Soundness'.
8. This issue has been responded to under 'Soundness'.
9. This issue has been responded to under 'Soundness'.
10. This issue has been responded to under 'Soundness'.
11. This issue has been responded to under 'Soundness'.
12. This issue has been responded to under 'Soundness'.
13. The 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.
14. This issue has been responded to under 'Soundness'.
15. This issue has been responded to under 'Soundness'. The site has been positioned in Years 9 & 10 in the housing trajectory.
16. The Site Summary in the Site Assessment Report explains why this site is being proposed as an Additional New Housing Site.
17. This issue has been responded to under 'Soundness'.
18. This issue has been responded to under 'Soundness'.
19. This issue has been responded to under 'Soundness'.
20. This issue has been responded to under 'Soundness'.
21. This issue has been responded to under 'Soundness'.
22. The selection of sites has been undertaken in accordance with the Site Allocations Assessment Methodology Statement, Publication Draft 2018 (EV51.1). The presence of a housebuilder or developer was not an overriding reason for the allocation of a site. However, the Council is mindful of the requirement in NPPF to ensure the Local Plan identifies specific deliverable sites for years 1 -5, and specific, developable

sites or broad areas for growth for the later years of the Local Plan, to meet housing need.

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

Test of Soundness

Main Issues:

1. Loss of Highly Sensitive Green Belt, Lack of exceptional circumstances. Council failed to specify and evidence harm to the Green Belt if a higher housing figure is adopted. Need to demonstrate consideration of alternatives. Densities on other sites should be increased to reduce the need for Green Belt release.
2. Ecology - impact on wildlife including wild deer, foxes, squirrels, field mice, barn owls, bats, the Wildlife Corridor, impact on Black Brook UK BAP Priority Habitat. Cumulative effect of all the sites along Saddleworth Road. Development will raise levels of light and noise pollution with detrimental impact on wildlife.
3. Inadequate local road network, specifically capacity, congestion, road safety and on street parking. The transport modelling fails to identify output from the Stainland Road-Saddleworth Road junction. Elland Station will not alleviate congestion at West Vale. Proposed mitigation is inadequate. Development along Saddleworth Road will have a detrimental impact on the West Vale junctions, further exacerbating an existing issue.
4. 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 and lack of committed investment. Combined sewer overloads discharge into the Black Brook. No current plans to upgrade the sewer system. Travel times to facilities will be longer than stated once this site is developed. Lack of ability for schools to expand.
5. Creation of Urban Sprawl - impact on health and wellbeing, increase in pollution, increased car dependency.
6. Air pollution - Additional traffic, impact on air quality, particularly impacting on children. Monthly readings of air quality in West Vale regularly exceed the limit set by the Council. Noise pollution from increased traffic. Development goes against Climate Change Emergency.
7. A planning application for an adjacent site was refused in July 2019.
8. The Sustainability Appraisal scores would suggest there are two more suitable sites which should be replacements for LP0952 and LP0177. Question application of the Sustainability Appraisal in the site assessment process.
9. Sites should be allocated that in more suitable locations, nearer amenities.
10. Sites should be allocated to meet needs of the older population.
11. The additional local plan sites will be to meet the needs of "incomers".
12. There are no sites for employment in the Greetland and Stainland ward. This will increase commuting.
13. Flooding -increased risk of flooding, including from underground springs, and increasing flood risk

downstream. Poor drainage. Complex water system with natural springs. Knock on effects caused elsewhere. Site is a natural and essential soak away. The Plan does not comply with current policy and legislation on flooding. Clay soil in the area make SuDS unsuitable. The land is a flood plain. Houses should be directed to areas at lower risk of flooding.

14. No consideration of brownfield sites. The Brownfield register is not up to date. The site at West Vale Works should be included in the Local Plan.

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

16. Loss of open space, impact on footpath. This will lead to a detriment to the health of the community.

17. The Local Plan should be paused until the Brexit transition period has ended and the effects on growth can be better understood. Objectively assessed need is too high as it relates to out of date population projections, which have been superseded by lower ONS projections. Housing requirement is overstated. Financial forecasting used to determine the number of houses is not sound and should be revised.

18. Has the Council asked other authorities to accommodate some of Calderdale's housing requirement?

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

20. Loss of agricultural land.

21. Site access unsuitable.

22. Site is outside the settlement envelope and would be an intrusion in the open landscape. Would be an isolated form of development.

23. This plan does not align with the strategic direction of Calderdale Vision 2024, and will destroy local green spaces and the habitat for animals potentially effecting mental well-being.

24. Concern that this site has been unfairly assessed.

25. Allocation at odds with climate emergency.

26. Optimise the density of development including increasing densities on other allocations.

27. The Council use of terminology "relatively" does not coincide with the NPPF guidance that the site is "well served by public transport."

28. Potential for increased crime in the area.

29. The Council has failed to differentiate between housing need and requirement, as it has not evidenced its economic and growth forecasts. Employment estimations are over exaggerated, particularly in retail, health care and public services.

30. The Plan fails to comply with the overarching principles of the NPPF.

31. Where is evidence that the Northern Powerhouse will generate unprecedented economic growth?
32. Development of the site would have a constraining effect on any expansion plans for the adjacent Sia Fibril/Bosch site.
33. Economic assumptions should be revised, resulting in lower levels of housing required
34. Settlement hierarchy work does not refer explicitly to Greetland and West Vale.
35. The sites on Saddleworth Road were added after the draft Local Plan was agreed at full Council.

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. 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.
2. The Conservation Section (Ecology) has indicated that development would be acceptable subject to various mitigation measures which have been included as site specific considerations. This includes retention of boundary trees, planting native dense scrub and species rich hedgerows. 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 issue of impact of light and noise pollution has not been raised by the Conservation Section (Ecology), however 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.
3. 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. The traffic modelling has informed the Council about the implications of the development strategy and has helped with the identification of interventions within the IDP and the Transport Strategy.

4. The Infrastructure Delivery Plan is a compendium of projected infrastructure provision and it helps to ensure that this infrastructure is provided in a timely manner and in a coordinated and sustainable way. It sets out the infrastructure that will support the level of development that is proposed in the Calderdale Local Plan. The IDP is a living document, updated on at least a yearly basis and contains a chapter on healthcare, education provision, utilities and public transport. Water supply and treatment is not a constraint on growth. Yorkshire Water has a responsibility to supply potable water and take away waste water. Phasing of development may be necessary to enable improvements to the capacity of some WWTW's.

5. Document EV 09 Exceptional Circumstances for the Release of Green Belt (2018) considers the process that the Council has followed in relation to the potential need to release land from the Green Belt. It can be seen that a methodical approach has been built into each stage of the process and that ultimately this process has dovetailed with the Government's emerging policy on exceptional circumstances. The proposed changes to the Calderdale Green Belt are clearly a last resort and have been minimised. Furthermore, the boundary changes are essential to achieving a sustainable future for Calderdale – one that reconciles economic, social and environmental sustainability. The policies within the Local Plan support the achievement of the Local Plan Transport Objective, 'To ensure the provision of a sustainable, safe and efficient transport system which reduces car dependency and improves quality of life through a balance of promoting economic growth, enhancing environments and improving transport access for communities'. To achieve these objectives the Council is developing a range of strategies and interventions, and the Local Plan has a role to play in supporting these, but also ensuring development proposals meet these objectives and contribute more widely to an integrated 'active mode' network.

Chapter 12 of the Local Plan (Health and Well Being) and guidance contained within the NPPF highlight the role of the planning system in supporting health, social and cultural wellbeing and creating healthy, inclusive communities. A health impact assessment (HIA) helps to ensure that health and wellbeing are being properly considered in planning policies and proposals. Where sites contain public footpaths, schemes will be expected to incorporate this in their layout, or if ultimately necessary, arrange for a suitable diversion.

6. Environmental Health has not raised any concerns in terms of the impact of development on air pollution levels in the area. However, the Low Emissions Strategy (2017) EV03; Air Quality Action Plan (2018) EV03 and Air Quality Technical Paper (2018) EV04, contain strategies and actions plans which are working together to help reduce and manage emissions and improve air quality. Noise pollution has been highlighted as a concern by the Council's Environmental Health Section, and consideration of traffic noise on dwellings will be required. A Noise Impact Assessment is also required.

7. The planning application was recommended for approval by officers, but refused at Planning Committee, and withdrawn at appeal. The application was for extension to the existing campsite to the west of the site, and officers considered that the proposed benefits arising from the proposal would outweigh the potential harm to the Green Belt in this instance.

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

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

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

11. The Local Plan seeks to balance the housing growth with economic aspirations, to reduce in-commuting.

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

13. The NPPF makes it clear that 'inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere'. Supported by the Calder Catchment Strategic Flood Risk Assessment 2016 (SFRA), the Local Plan is focused upon managing flood risk from all sources and applying a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change. The site is not located in a high risk flood area, it is within Flood Zone 1. Where flooding constraints have been highlighted on parts of the site through the site analysis process and the SFRA screening exercise, these areas have been removed from the developable area of allocations. Full reasons have been given in the site assessment summary where the developable area of a site has been reduced due to flood risk. Given the size of the site, a Flood Risk Assessment would be required in order to assess any risk of flooding and propose mitigation measures to reduce such risks. The Drainage and Flooding Section consider that although land drainage issues have been reported in the past, the site is suitable for development after a Hydrological Assessment is carried out. The provision of green and blue infrastructure such as SuDS and green roofs has also been recommended to mitigate against the loss of a greenfield site and the potential impacts on infiltration.

With regard to clay soil being unsuitable for SuDS, it should be noted that many different SuDS techniques can be implemented. As a result, there is no one standard correct drainage solution for a site.

14. The allocation process requires a willing land owner and developer in order to demonstrate the deliverability of the sites and therefore whilst there are aspirations to use as much brownfield urban land as possible this may not always be demonstrably deliverable. In terms of the site assessment process, in order to identify the most sustainable sites a 'sequential' approach to housing allocations has been adopted that prioritises brownfield sites in the urban area, only using the most sensitive Green Belt when all alternative sites were used. The Council's most up to date Brownfield Land Register was published on 31 December 2018. A revised register is currently being prepared. The site referred to (West Vale Works) is an allocation in the Local Plan - LP1088.

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

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

17. The Planning Practice Guidance states that the 2014-based household projections should be used as the

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

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

19. The paper to the Local Plan Working Party 17th August 2016 attached to evidence document EV09 considers the distribution of development throughout the Local Plan process. The Council considers its distribution of development to be justified and supportive of sustainable development. The Local Plan is supported by a large amount of evidence, and together with the site assessment process, it has been demonstrated that the level of housing growth can be accommodated. The Local Plan is supported by the Infrastructure Development Plan which sets out the infrastructure requirements resulting from the growth proposed in the borough. It is a compendium of projected infrastructure provision and it helps to ensure that this infrastructure is provided in a timely manner and in a coordinated and sustainable way.

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

21. The Highways Development Management section has considered comments regarding unsuitable access via Scar Bottom Lane, but consider that it could be brought up to adoptable standards at its junction with Saddleworth Road.

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

23. It is considered that the approach of the Local Plan is consistent with Vision 2024.

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

25. 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).

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

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

27. Accessibility modelling has been undertaken by West Yorkshire Combined Authority which takes into account the most recent integrated transport networks and public transport timetables. The methodology used for assessing accessibility is within the appendices of the Site Assessment Methodology document. The site has good accessibility to public transport with the site being within 400m of a bus stop with a service at least every 30 minutes.

28. 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.

29. 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 figure was derived.

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

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

32. Neither Environmental Health nor Business and Economy colleagues have suggested that development of this site for residential development would have a constraining effect on the neighbouring employment site.

33. 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.

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

35. The sites included within this consultation were agreed at a meeting of Cabinet on 14 October 2019.

Duty to Co-operate

Main Issues:

1. Development of Highly Sensitive Green Belt land would effect character of the area, be detrimental to ecology and residents, and be illegal with regards to flooding and Green Belt policy.
2. Cumulative impact of development of all sites around Saddleworth Road should be considered.
3. Ineffective public consultation.
4. The proposals do not conform to current legislation with regard to Green Belt and flood risk. There are brown land areas that could be developed first. The Brown Field Register has not been updated since 2018
5. Creation of Urban Sprawl - impact on health and wellbeing, increase in pollution, increased car dependency. This site must be considered with LP0177, LP0952 and LP1625 as they are interrelated.
6. Inadequate local road network, specifically capacity, congestion, road safety and on street parking.
7. Impact on air quality.
8. Increased risk of flooding, the Council has a duty to comply with policy and legislation on flooding.
9. 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.
10. Concerns about the way in which the Local Plan has been formulated and worries about the influence and involvement of major developers in selecting sites.
11. Constraints and negative effects cannot be mitigated against. Not viable to build houses here.
12. Non compliant with NPPF.
13. No evidence that the duty to cooperate has been complied with.
14. Economic forecast is out of date.
15. No evidence that the views of agencies have been sought.
16. Ecology - loss of wildlife and habitat
17. Brownfield sites should be utilised first.
18. Housing need should be transferred to neighbouring authorities.
19. The sites on Saddleworth Road were added after the draft Local Plan was agreed at full Council.

Council's Response:

1. These issues have been responded to under 'Soundness'.
2. This issue has been responded to under 'Soundness'.

3. This issue has been responded to under 'Legal Compliance'.
4. These issues have been responded to under 'Soundness'.
5. This issue has been responded to under 'Soundness'.
6. This issue has been responded to under 'Soundness'.
7. This issue has been responded to under 'Soundness'.
8. This issue has been responded to under 'Soundness'.
9. These issues have been responded to under 'Soundness'.
10. The planning system requires the involvement of willing developers and land owners, as well as consultation with communities and other partners. Developers have put forward legitimate proposals to demonstrate the deliverability of sites.
11. The Council considers appropriate mitigation measures have been provided as detailed in the 'Reports Required' and 'Site Specific Considerations'.
12. It is not clear in what regard the Local Plan is not compliant with NPPF.
13. 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.
14. 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.
15. This issue has been responded to under 'Legal Compliance'.
16. This issue has been responded to under 'Soundness'.
17. This issue has been responded to under 'Soundness'.
18. See Submission Document SD 13 Duty to Cooperate Statement Including Statements of Common Ground (January 2019).
19. This issue has been responded to under 'Soundness'.

Suggested Modifications

1. Remove this site from the Local Plan.
2. Utilise brownfield sites.

3. Sites along Saddleworth Road to be viewed collectively.
4. Redistribute housing to other areas.
5. Set out to Government that the Council is refusing to accept a higher housing requirement.
6. Revisit the Plan.
7. Scrap economic projections. Prepare post Brexit economic forecast.
8. Increase densities on sites in Brighouse.
9. Neighbouring authorities should accommodate some of Calderdale's need.
10. Commission survey of all brownfield sites.

Council's Response:

1. No change required - The allocation of the site is considered to be consistent with the Council's site allocation methodology and positioning in the trajectory as set out in the Housing Technical Paper. Document EV 51.1 Site Allocations Assessment Methodology - Publication Draft (2018) details the process the Council has followed in relation to the site assessment process. The document outlines the various stages of assessment from initial site identification to the implementation of the Sequential Approach.
2. No change required - 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.
3. No change required - The paper to the Local Plan Working Party 17th August 2016 attached to evidence document EV09 considers the distribution of development throughout the Local Plan process. The Council considers its distribution of development to be justified and supportive of sustainable development.
4. No change required - 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.
5. No change required - In order for its Local Plan to be found sound the Council must make provision for the housing requirement identified in the SHMA to be either met within the district or in neighbouring districts. As the surrounding authorities have agreed through the Leeds City Region Statement of Common Ground to meet their own housing requirement this latter option is precluded.
6. No change required - The Local Plan is currently being examined by a Government appointed Inspector.
7. No change required - 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.
8. No change required - Density multipliers were considered in order that the site capacities were reflected as accurately as possible, and without overstating capacity. The density multipliers agreed by the SHLAA Working Group were based on those included in 'Tapping the Potential' published in 2000. These have been

used in assessing the housing allocations in order to determine indicative site capacity. The revised housing requirement is to be partially met through an increase in densities on some of the mixed use sites.

9. No change required - The Calderdale SHMA (2018) (EV36) demonstrates that Calderdale is a predominantly self-contained housing market, albeit with linkages to other areas. Therefore, the Local Plan aims to accommodate all the objectively assessed needs identified for housing within Calderdale. A similar approach of meeting their own needs is being taken by neighbouring authorities. See Submission Document SD 13 Duty to Cooperate Statement Including Statements of Common Ground (January 2019).

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

Document Section: Site number LP0177 Land adjacent Ellistones Place, Saddleworth

Representations

Comment ID **HRU1008**

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

Person ID: **1243836**

Name: **Ms Helen Williams**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

Flood plain. Air quality. Road congestion. No school places. No GP provision.

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

Duty to Co-operate Reason:

Suggested Modifications:

Consider air quality with queueing traffic, and propose a solution. Consider impact of building on floodplain, and propose mitigations. Propose solutions to school and GP provision.

Comments:

Additional Evidence Link:

Comment ID **HRU1010**

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

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, and is not consistent with national policy, for the reasons stated in the document below

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/5609667>

Comment ID **HRU102**

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

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:

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 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 fields LP0177 Ellistones Place Saddleworth Road, Greetland suffered severe flooding (pictures attached). The flooding was so severe by Woodfield Drive that one resident was able to paddle his canoe on it. Any building on this land would cause flooding of the houses at Woodfield Drive and in West Vale and therefore does not comply with current flooding policy and legislation as outlined above. Calderdale Council Planning Department has a duty of care to comply with current policy and legislation on flooding. Furthermore several months ago Saddleworth Road adjacent to these fields burst as it was unable to absorb the water flow and the road had to be closed off for several days contributing to a car accident on this busy road (this is not the first time water has forced it's way through the road causing disruption). 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, current Housing Minister's written policy on Green Belt land and quote: -“My department is working with DEFRA (Department of Environment, Food & Rural Affairs) and Natural England on the once-in-a-generation Environment Bill which will establish a comprehensive legal framework for environmental improvement and make net gains for biodiversity mandatory for new development. Of course one of the most important environmental safeguards we have is the Green Belt. And I want to be clear that our commitment to this is as strong as ever, with any changes only happening in exceptional circumstances ; protecting the Green Belt goes beyond protection against development”- Exceptional circumstances in The Government White Paper -“Fixing our Broken Housing Market”-Parag 1.39 states that: The Government wants to retain the high bar to ensure the Green Belt remains protected, but we also wish to be transparent about what this means in practice so that local communities can hold their councils to account therefore we propose to amend and add to the National Policy to make it clear that: authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including :- making effective use of suitable brownfield sites and the

opportunities offered by state regeneration:- - There has been no evidence of this and planners in Calderdale's Planning Department have stated several times - "Developers do not want to build on brownfield sites" this is against government policy and does not constitute exceptional circumstances. I refer to the judicial review - *Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council* (2015) EWHC 1078 (Admin), Jay J - where Richard Turney appeared for the claimant "Mr Turney ... submitted that the fact that a particular site happens to be suitable for housing development cannot, without more, constitute an exceptional circumstance justifying an alteration of the Green Belt. I agree with Mr Turney insofar as this goes .. Suitability simpliciter cannot logically be envisaged as an exceptional circumstance". - This land is classified as "highly sensitive green belt" on the Local Plan. In 2016 regarding the first Local Plan a petition with 161 signatures objecting to building on our beautiful Green Belt was presented to Calderdale Council Planning Department and 30% of the total objections submitted from the whole of Calderdale residents were from the Greetland area alone. - This appears to have been ignored. 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 which Calderdale Council have adopted.

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. The NPPF sets out the aim of Green Belt policy which is - "to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence." (NPPF 79). Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: (i) to check the unrestricted sprawl of large built-up areas (ii) to prevent neighbouring towns merging into one another (iii) to assist in safeguarding the countryside from encroachment (iv) to preserve the setting and special character of historic towns (v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The Council, in its own evidence, concludes that the overall parcel within which the site is located performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt but, most decisively, would see the coalescence of Greetland and West Vale and the deterioration of the identity of both places undermining the Council's Settlement Hierarchy. Notwithstanding this, the quantum of housing proposed in and around the site is undeliverable during a single plan period in plan-making terms and unsustainable in infrastructure terms in relation to the capacity of existing highways, schools and local services. Accordingly, this site in the existing Green Belt should be removed from the Plan as the exceptional circumstances for its release do not exist. Furthermore the proposed site does not meet national policy with regards to flooding as detailed above. Clean Air Policy ; even higher numbers of traffic would cause further pollution in what is already a bottleneck area of high congestion with Sunnybank Nursery and Pre school playground just a few feet away from the busy congested road putting the health of our children at risk. Greetland has been incorporated with Elland, whereas the likes of Mytholmroyd, Ripponden and Brighouse all stand alone. I feel the the Council have done this to hide the fact of the disproportionate amount of building they have allocated to Greetland, for example Elland which is the Portal you have to go into to access Greetland is split into six parcels, out of the six, four of the allocated slots are for Greetland: LP0026, LP0177, LP0952 and LP1625 all up Saddleworth Road. Greetland is a community in its own right and when shown the amount of build in this one small area it is totally disproportionate. This is the reason Greetland has been incorporated in with Elland, to disguise the volume of build in this area. Greetland is HX4 and a village whereas Elland is HX5 and a town.

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

Duty to Co-operate Reason:

1) Does not comply with current policy and legislation on flooding as any build on this land would lead to flooding in surrounding areas; if the water is funnelled away the only place it can go is West Vale which would surely flood. 2) There are no justifiable exceptional circumstances for change of use of this Green Belt land; by Calderdale Council own assessment it is highly sensitive Green Belt land and meets all 5 purposes. 3) This is already a highly congested road; adding further traffic would be putting our children's health and well-being at risk. 4) This is a most unsuitable site for development with the flooding', nursery playground on the roadside, highly sensitive Green Belt and a wildlife corridor and it beggars belief that this site has been put back on the Local Plan having already been turned down several times for planning attempts over the years because of the unsuitability for development.

Suggested Modifications:

N/A

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5593693>

Comment ID **HRU1025**

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

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:

This amendment to the Local Plan is not in line with strategic planning requirements to utilise brownfield sites for building does not meet national planning guidelines in terms of building on flood planes/run off areas has not gone through any consultation process with local councillors or communities - it has just appeared!

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

Sound Reason:

This site is not fit for building for many reasons - It forms a run-off area and flood plane for the valley as a whole - and has done for hundreds of years. The numerous springs along the valley join Black brook at the base of this field and building on the area could have huge implications - for the people who live in the houses themselves but also further down the valley in West Vale and Elland - which already struggle with flooding issues on a regular basis. Building on a site this large will result in a massive increase in road vehicles joining Saddleworth Road. From here - it will add to the already horrendous congestion in West Vale or will increase traffic through adjoining villages of Barkisland and Ripponden. Ripponden already struggles with commuter traffic to and from the M62. Increasing road vehicles will increase air pollution. This has already been identified as an issue by Calderdale Council. The infant school is low in the valley (and already subject to bad road congestion) and will be directly affected by further pollution. Local amenities are already stretched and there is little given in explanation as to how the local School (full), doctors, dentists, etc will cope? Black Brook itself is a local amenity. It is a haven of peace going through the valley - tracing the routes used in olden days when the valley was full of working mills - only a few of which remain. The mills were there to utilise the water which was in abundance (see the first point!) The

area is full of wildlife - deer, herons, kingfishers, foxes, rabbits, etc. - why should we remove their habitats when there are brownfield sites available for building?

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

Duty to Co-operate Reason:

This plan has been amended by individuals who do not live in the area, did not consult anyone in the area, and do not really care what happens - as long as its not in their backyard! The Communities and Councillors in this area wish to be consulted and heard on this matter and SHOULD have been .

Suggested Modifications:

Remove this site from the local plan. Consider brownfield sites for building.

Comments:

Additional Evidence Link:

Comment ID **HRU1038**

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

Person ID: **1243855**

Name: **Mrs Tracie Taylor**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The above mentions the need for community involvement. If this plan were to be approved this would have a detrimental effect on the local community. A large amount of large open space would be lost. This space is used by local residents and those from further afield. It is a wildlife corridor and is home to many birds (including kingfishers, dippers, herons and owls) and mammals (hedgehogs and mice). In a time when we are seeing a decline in such species it seems unreasonable to move what is a very important wildlife corridor. Any such development would need to be supported by a well developed infrastructure. This is not the case. At present West Vale is subject to ongoing roadworks. These are adding considerable times to journeys. The journey time has increased over recent years without additional houses. The local school is also over subscribed every year and that would mean more people having to travel further to an appropriate school - meaning more cars on the road. air pollution is another consideration. The local plan talks about up to 600 extra houses. This could be 1000+ extra cars, producing more air pollution in a residential area. It is recognised that air pollution can exaggerate such conditions such as asthma and COPD.

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

Sound Reason:

This is not consistent with national policy - taking away green belt land when there is sufficient brown belt land available. in addition to this the plan refers to the possibility of flooding in this area as once in 100 years. We have lived here 20 years and this particular area has flooded on at least 4 occasions. With the recent rainfall any properties on this area would most definitely be subject to funding. If the previous course of action happens then these residents will be able to apply for funding to support their recovery. Quite right but where will this additional money come from? Any properties built here are not sustainable.

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 **HRU1040**

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

Person ID: **1243857**

Name: **mr ralph brook**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Please see attached file

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609688>

Comment ID **HRU1041**

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

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:

This element of the plan for the proposed development on greenbelt land in Greetland as listed under LP0177 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.

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

Sound Reason:

I object to the plan and object to it and highlight the fact it is NOT sound for the following reasons. Loss of the Green Belt within Greetland Esther McVey's policy says that; "protecting the green belt goes beyond protection against development" and therefore, this proposal goes against this directly as other suitable brownfield sites that do exist in Greetland have not been explored sufficiently and proposed as alternative development considerations. Clearly all policies and findings suggest a common view that we must focus an importance of protecting our greenbelt spaces. Referring to National Planning Policy Framework (NPPF) chapter 13, paragraph 143 says that: - "Inappropriate development is, by definition, harmful to the green belt and should not be approved except in very special circumstances". Given all other associated - "issues" with this stretch of greenbelt land, such as infrastructure, flooding, and community impact, then I would objectively suggest that there are NO EXCEPTIONAL circumstances that could in any way justify this development on the greenbelt in Greetland and the massive negative impact it will cause. Further: referring to the NPPF chapter 13 paragraph 137: "before concluding that exceptional circumstances exist to justify changes to greenbelt boundaries, the strategic policymaking 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 proceeding paragraph, and whether the strategy: a) makes as much use as possible of suitable brownfield sites and underutilised land" Suitable Brownfield sites are available in Greetland and have NOT been exhaustively considered as alternative land for development. The negative impact on wildlife and the health and well-being of the local community will be immeasurable if this development happens. Suffice to say that this Greetland greenbelt land is used by a large number of local residents on a daily basis. The need to preserve this - "highly sensitive greenbelt" (actual classification on the Local Plan) its local wildlife and being a place of healthy recreation, exercise, wellness and enjoyment further support the call for this proposal to be scrapped and alternative brownfield land in Greetland be approved for any development. Flooding Chapter 14, paragraph 163 of the NPPF says: - "when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere" Calderdale Council has failed to comply with policies on flood risk management. and environmental issues have been ignored by this Council. Under question is the Calderdale Council's Sustainability Appraisal process that supports the release of these Greetland Green Belt development sites with the 'Land adjacent Ellistones Place' (Ref: LP0177) being part of the wider Calderdale Local Plan 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". Military support has been called into Calderdale on Saturday 15 th February 2020 whilst we brace ourselves for the onslaught of Storm Dennis and following the risk to life and devastation of the floods created by Storm Ciara last weekend. The impact on the Calder Valley and the actual effects onto Saddleworth Road, and down into the proposed development site LP0177 is clear. The local and national news is covering the huge flood impact on our local community in Calderdale. Huddersfield Examiner Website Headline Story February 15 th 2020: - "Storm Denis Flood Fears In Calderdale, Prompts Army Response to Protect homes" Yorkshire Post Website February 15 th 2020 - "Armed Forces Arrive In Calderdale to SUPPORT flood response and Storm Dennis preparations" The Belfast Telegraph February 15 th 2020: - "Army to Help - "Exhausted" Flood-Hit Residents in Yorkshire" (all relating to Calderdale) I again refer to the NPPF (paragraph 95) and highlight POLICY surround development proposals that could impact and adversely effect public safety and security and that of our defence: 'Planning policies and decisions should promote public safety and take into account wider security and defence requirements by: a) anticipating and addressing possible malicious threats and natural hazards... This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and b) recognising and supporting

development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.' Clearly these proposed sites that flood regularly would be far more at risk due to the development of this green belt. 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. This proposed development is a RISK to life and the change in the landscape, due to the development, will further fuel the ongoing worsening of flooding in this area due to climate change and previous development of natural landscapes. Community The development will have a negative impact on the community. The entire Greetland 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 every day. I walk our two dogs along the entire Greetland greenbelt and it's a great example of, what should be, protected greenbelt land that offers massive health and well-being benefits to local residents and also a thriving environment to the abundant wildlife. From the NPPF, it clearly says "To protect and enhance biodiversity and geodiversity, plans should: a) identify, map and safeguard components of local wild-life rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity". Clearly this development is at odds with this directive as it would damage local wildlife altering and negatively impacting biodiversity as well as habitats and the landscape. Alternative land in Stainland has been previously removed from the Calderdale Local Plan. This land in Stainland would have avoided all such negative impacts. Therefore, the Calderdale Local Plan and the local planning authority have failed to adhere to this legislative policy. Infrastructure The entire proposed development in Greetland under the Calderdale Local Plan of approximately 600 homes is simply unsustainable from a physical infrastructure perspective. The local schools are full, the local GP surgery is under massive pressure and the road infrastructure cannot cope with current traffic levels. The pressure on the traffic light controlled junctions within West Vale, with traffic feeding from Saddleworth Road, Stainland Road and Rochdale Road, is unsustainable and the aforementioned road structure is almost not fit for purpose with current traffic levels. When there are any issues on the M62 between junction 22 and 24 (fairly frequently) then these routes become completely gridlocked. An extra estimated 1200 cars just feeding into this from the Greetland sites as proposed with the Calderdale Plan will not only add increased congestion issues but also have a bigger impact on the environment and also increase the risk to pedestrian safety and wellbeing.

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

Duty to Co-operate Reason:

Given that the plan is in breach of the NPPF Policy, then if the "Duty to Co-operate" is a negative action by Calderdale Council, the Planning Department and the Calderdale Local plan, then "No" the plan does not comply. However, I feel this is such an ambiguous question that feels set out to intimidate and confuse local people and try to avoid objections. Might I also add that the lack of knowledge and communication to local residents about this "re-submission" of these lands within Greetland is not acceptable and should form a basis of an independent enquiry. The fact that a local group of residents has created a pressure group on social media, been featured on Regional TV News, been featured in Local Press and has organised protests at the Halifax Town Hall and on the greenbelt in question, shows that feelings are very strong about protecting this land and making sure the environment and infrastructure in Greetland is not negatively impacted by this misplaced development proposal.

Suggested Modifications:

All land within Greetland should be pulled from this plan and all brownfield land should be fully used as an alternative.

Comments:

Additional Evidence Link:

Comment ID **HRU1047**

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

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:

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 with many gardens of properties in the area being flooded. Building on this land would add to the existing flooding problems throughout Calderdale. **LOSS OF GREEN BELT** Greetland has many brown field sights which should be built on first. There are a limited number of green belt sites in the village, so they should be protected at all cost. The land is used by residents, children and walking groups to enjoy local nature which has positive benefits on health and wellbeing, within walking distance for the community to enjoy. **WILDLIFE** The local wildlife will be devastated by this development including birds such as Herons, Kestrels, Kingfishers, Owls and also Bats which are seen regularly in the area, along with Foxes, Deer **TRAFFIC CONGESTION** This development has only one road in and out which is already congested, and the new residents would need to use their cars as there are no regular busses and local schools are oversubscribed meaning parents would have to use their cars to take children to schools out of the area. It is already extremely timely to pass through the traffic lights at West Vale and the development will only add to the congestion both in West Vale and Ripponden. **AIR POLLUTION** There is already congestion on Saddleworth Road with cars sat in stationary traffic with engines running throughout peaks times. This new development has the potential to put an additional 1200 cars on the road all adding to the air pollution which will be breathed in by the children playing in the school yards next to the roads. **INFRASTRUCTURE** Greetland is a village not a town and the current infrastructure is simply not geared up to cope with 600+ houses in the area. Schools are full with no space to expand their buildings and facilities further. Doctors are full to capacity and Dentists already have long waiting lists. The traffic issues have been cited above.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1048**

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

Person ID: **1243596**

Name: **Mr Stephen Smallburn**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Lack of consultation on the revised Local Plan.

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

Sound Reason:

The Plan doesn't take into consideration the increased probability of local flooding if the flood plain is altered as a result of the proposed number of houses to be built on this site. Access and egress to the proposed site would be difficult onto Saddleworth Road especially at times when the road is being used as an alternative route to Huddersfield and Halifax when there are problems on the M62. Already stretched amenities eg Doctors, schools and public transport would be unable to cope with the increased volume of people as a result of the proposed development. Gate Head Lane provides access down to the river for the local community and is used on a very regular basis. The lane is narrow and increased traffic would make it unsafe. There is a great deal of wildlife to be seen in this area foxes, deer, herons and frogs which could be lost as a result of the development. Any development would increase the urban sprawl which has crept up the valley from West Vale and there is a danger that the villages of Greetland and Barkisland will lose their identity forever. Air pollution continues to be a growing issue and further housing development will have a negative impact on the local community.

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

Duty to Co-operate Reason:

The resubmission of the Local Plan was made without further consultation.

Suggested Modifications:

There needs to be a review of the Economic Development Plan prior to Local Plan being agreed based on the many changes that have taken place in the UK over the past three years.

Comments:

Additional Evidence Link:

Comment ID **HRU1051**

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

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 **HRU1057**

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

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 have not been looked at and given that the amount of building proposed in Greetland is disproportionate to other areas in Halifax in addition to the previous reasons stated, I believe that the proposed plans are therefore not sound.

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

Duty to Co-operate Reason:

10 Elland Additional Housing Sites : I am at a loss to understand how Greetland can be categorised as Elland and find the heading very misleading. I wonder if this was to enable plans to go under the radar, so to speak, of concerned residents of Greetland. The fact that I only found out about the plans to build on the proposed sites and the extent of the development which will impact myself and my neighbours directly, due to us living directly opposite site LP0177, through a Facebook post, I feel, does not comply with the Duty to Co-operate.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1067**

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

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 Fibril/ Bosch. This is due to employer being unreasonably constrained to invest in the site due to emission legislations. The existing stack would be approximately 50m from the proposed site. The result could see a major employer to the area leaving Calderdale to develop an alternative site which does not support employment growth. The development will impact on access to open space which will negatively impact on mental health. Amenities Paragraph 94 of the NPPF states that ' It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: 28 a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and b) work with schools. The Local Plan in Greetland has not seen any of this work done in relation to the local junior schools. As far as parents and the local community are aware the local school has not been consulted on the Local Plan. Due to the fact that The Greetland Academy and West Vale School are academies, they cannot be pushed to expand, this is in direct opposition to the National Planning Policy Framework, and therefore not compliant. We know that the primary school is already oversubscribed. The scale of proposed development would completely overwhelm an already oversubscribed school. Children already living in Greetland may face a situation where there is no place available to them at their local junior school. There is also a very real increased risk posed to the children of Greetland Academy, should the proposed development go ahead. The local Doctors surgery is full and so do not have the capacity to take on more people in terms of health car. Therefore the development is not sustainable with the local economy unable to support the increase in population. Flooding Calderdale has experienced how unpredictable the water system is particularly in this area, we are constantly reminded of the topography of our landscape and the surrounding areas, and the impact it already has on our lives. Over thirty million pounds has so far been spent on flood defences in Calderdale, and still we have to have the Army called in to help protect us from flood water. It is not right to build on the land in Greetland put forward in the Local Plan. Flooding cannot be militated against in this area. The land as it stands, is helping to prevent further disaster, and must remain as it is. To even suggest altering the way in which this land functions is an inappropriate and irreversible gamble. It is not fair to gamble with the lives of the community, when the community is so opposed to it. The NPPF states that the Local Plan should take account of climate change over a long period of time, including factors such as flood risks, changes to biodiversity and landscape. The NPPF also states that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. To so dramatically change the function of the landscape of the sites put forward for development in Greetland would completely disregard the risk climate change poses to the community on the form of flooding. The entire proposed site falls within a flood zone, over a 5th is graded flood zone 3a, where we have seen the impact of flooding in 2015 and more recently in February 2020. The

risk of severe wide area flooding is increasing and therefore remains a high risk. To build on this site would compromise the flood storage area and no surface water drainage network, 10m cordon or green roofs will mitigate the risk of flooding as we have clearly seen up and down the Calder Valley. I would consider it immoral to allow home owners to purchase new homes with the prospect of not being able to obtain sufficient house insurance due to proximity of flood zones. Black Brook is a haven for wildlife and is a UK BAP priority habitat. Any development including access roads will have a negative impact to wildlife including deer and herons even with a proposed 10 m cordon due to noise, traffic light pollution. How can the Council consider developing a green belt land with such a rich wildlife and a high risk of flooding when there are other sites available?

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

Sound Reason:

Green Belt I am not satisfied that the Council has demonstrated exceptional circumstances to justify the release of land from the Green Belt which would destroy valuable agricultural land. Section 11 in the NPPF outlines what is meant by the efficient use of land. It states that the Local Plan must follow planning policies and make decisions which encourage the efficient use of land by re-using land that has previously been developed (brownfield land). This has not effectively been carried out in the area. We have a number of undeveloped brownfield sites in the area, which have not been properly pursued. Traffic With the associated increase in traffic it would compound the road infrastructure especially around the junction with Saddleworth Road and Stainland Road. There has been no investment in this bottleneck where public transport offers no mitigation since buses are also trapped within the queuing traffic resulting commutes into Halifax in excess of 15 minutes and journeys to Hospitals approaching 60 minutes. The transport infrastructure is unable to support this development with access to the rail network being beyond 2 km. The Highways England have themselves suggested that the development of this site not to commenced until the completion of the Road Investment Strategy and then more enhancement is needed beyond 2030. Air Pollution With the increase in standing traffic from the 1200 cars (based on two cars per household from the proposed 600 houses) will also impact on air pollution around dwellings, schools and nursing homes. Such a disproportionally high increase in air pollution will have unthinkable implications for the children of our community. If the government has set targets to reduce air pollution then it does not make sense to allocate such a vast proportion of the overall planning to one area, along one road, where the pollution in the air will become concentrated and toxic. Economic growth The increased housing allocation within the Local Plan is based on projected economic growth, however as both the Inspector and the Council have acknowledged this calculation on based on assumptions. I would like to quote Councillor Sutherland when he addressed the Cabinet during a meeting on the 14th October 2019; "There were not many opportunities for the Council to make decisions in Planning, and once greenbelt sites were built on, there would be no opportunities to change this which would have a lasting impact on Calderdale. In essence, what were the tangible benefits on these sites and how would these be balanced and tested? - "With no evidence on economic growth, Green belt land is proposed to be developed which is unjustified. In a perverse way, residential dwellings close to industrial buildings will have a negative impact such as Sia Fibril/ Bosch. This is due to employer being unreasonably constrained to invest in the site due to emission legislations. The existing stack would be approximately 50m from the proposed site. The result could see a major employer to the area leaving Calderdale to develop an alternative site which does not support employment growth. The development will impact on access to open space which will negatively impact on mental health. Amenities Paragraph 94 of the NPPF states that ' It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: 28 a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and b) work with schools. The Local Plan in Greetland has not seen any of this work done in relation to the local junior

schools. As far as parents and the local community are aware the local school has not been consulted on the Local Plan. Due to the fact that The Greetland Academy and West Vale School are academies, they cannot be pushed to expand, this is in direct opposition to the National Planning Policy Framework, and therefore not compliant. We know that the primary school is already oversubscribed. The scale of proposed development would completely overwhelm an already oversubscribed school. Children already living in Greetland may face a situation where there is no place available to them at their local junior school. There is also a very real increased risk posed to the children of Greetland Academy, should the proposed development go ahead. The local Doctors surgery is full and so do not have the capacity to take on more people in terms of health care. Therefore the development is not sustainable with the local economy unable to support the increase in population. Flooding Calderdale has experienced how unpredictable the water system is particularly in this area, we are constantly reminded of the topography of our landscape and the surrounding areas, and the impact it already has on our lives. Over thirty million pounds has so far been spent on flood defences in Calderdale, and still we have to have the Army called in to help protect us from flood water. It is not right to build on the land in Greetland put forward in the Local Plan. Flooding cannot be militated against in this area. The land as it stands, is helping to prevent further disaster, and must remain as it is. To even suggest altering the way in which this land functions is an inappropriate and irreversible gamble. It is not fair to gamble with the lives of the community, when the community is so opposed to it. The NPPF states that the Local Plan should take account of climate change over a long period of time, including factors such as flood risks, changes to biodiversity and landscape. The NPPF also states that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. To so dramatically change the function of the landscape of the sites put forward for development in Greetland would completely disregard the risk climate change poses to the community on the form of flooding. The entire proposed site falls within a flood zone, over a 5th is graded flood zone 3a, where we have seen the impact of flooding in 2015 and more recently in February 2020. The risk of severe wide area flooding is increasing and therefore remains a high risk. To build on this site would compromise the flood storage area and no surface water drainage network, 10m cordon or green roofs will mitigate the risk of flooding as we have clearly seen up and down the Calder Valley. I would consider it immoral to allow home owners to purchase new homes with the prospect of not being able to obtain sufficient house insurance due to proximity of flood zones. Black Brook is a haven for wildlife and is a UK BAP priority habitat. Any development including access roads will have a negative impact to wildlife including deer and herons even with a proposed 10 m cordon due to noise, traffic light pollution. How can the Council consider developing a green belt land with such a rich wildlife and a high risk of flooding when there are other sites available?

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1069**

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

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/5609693>

Comment ID **HRU108**

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

Person ID: **955050**

Name: **Mr Thomas Connor**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Lack of due diligence and failure of duty of care.

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

Sound Reason:

Failure by the Council to comply with Council policies on pollution control and flood risk management. Environmental issues ignored by Council which currently has a very poor Environmental track record.

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

Duty to Co-operate Reason:

Poor Public notification and little time allowed for proper consultation.

Suggested Modifications:

Look for more suitable site with lower environmental impact to comply with Government and Council policies.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5594275> ; <http://calderdale-consult.objective.co.uk/file/5595396> ; <http://calderdale-consult.objective.co.uk/file/5595398> ; [http://calderdale-](http://calderdale-consult.objective.co.uk/file/5595398)

Comment ID **HRU1080**

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

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 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 Storm Ceira brought 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 the site has been under water through much of February 2020. Even if the development does not extend to the valley bottom, the extra surface water created by these houses, and the extra load on the drainage system (which already cannot cope, nor are maintained properly by the council) would massively contribute to further problems. Water has to go somewhere and we're losing soakaway land. Even if the new developments don't flood, other properties will. Calderdale Council should take the opinion of their own drainage engineers. They will tell you it's already a very problematic area for them. Greetland is full of culverts and underground water courses, aside from Black Brook. - The traffic congestion on Saddleworth Road is already terrible. Most notably, when people are doing the 'school run' or if there's a problem on the M62, the queue to West Vale lights can back up to somewhere around Daleside, 0.8 miles from the traffic lights! Even on a normal day without M62 incidents the weekday wait time is unacceptable. To add hundreds of houses to this area (each with an average of 1.5 cars I believe?) is unthinkable. See attached photos. - Pollution and noise 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. - Planning permission has been denied here at least once, possibly twice. With good reason.

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 this site, 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. There is no mention of Natural England being consulted about the effect on local wildlife.

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609697>

Comment ID **HRU1082**

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

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	HRU1084	Site ref (if applicable):	LP0177
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 "LP0177 - Main Points of Objection"			
Do you consider the plan to be Sound?: No			
Sound Reason:			
Please see attached pdf document "LP0177 - 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 "LP0177 - Main Points of Objection"			

Suggested Modifications:

N/A

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609699>

Comment ID **HRU110**

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

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:

It ignores all planning advice/requirements regarding environmental and social issues.

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

Sound Reason:

It is not justified as the mitigations listed, in order to overcome the substantial list of site constraints, are wholly inadequate. No proper account is taken of the significant flooding risks, the preservation of wildlife habitat, the need to preserve green belt and its significant amenity value on this site or the infrastructure issues, e.g. schools, medical facilities and traffic congestion.

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

Duty to Co-operate Reason:

Suggested Modifications:

The only realistic modification is the removal of this site from the Plan.

Comments:

Additional Evidence Link:

Comment ID **HRU1104**

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

Person ID: **1243870**

Name: **Mrs Melissa Bairstow**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Green Belt I am not satisfied that the Council has demonstrated exceptional circumstances to justify the

release of land from the Green Belt which would destroy valuable agricultural land. Section 11 in the NPPF outlines what is meant by the efficient use of land. It states that the Local Plan must follow planning policies and make decisions which encourage the efficient use of land by re-using land that has previously been developed (brownfield land). This has not effectively been carried out in the area. We have a number of undeveloped brownfield sites in the area, which have not been properly pursued. Traffic With the associated increase in traffic it would compound the road infrastructure especially around the junction with Saddleworth Road and Stainland Road. There has been no investment in this bottleneck where public transport offers no mitigation since buses are also trapped within the queuing traffic resulting commutes into Halifax in excess of 15 minutes and journeys to Hospitals approaching 60 minutes. The transport infrastructure is unable to support this development with access to the rail network being beyond 2 km. The Highways England have themselves suggested that the development of this site not to commenced until the completion of the Road Investment Strategy and then more enhancement is needed beyond 2030. Air Pollution With the increase in standing traffic from the 1200 cars (based on two cars per household from the proposed 600 houses) will also impact on air pollution around dwellings, schools and nursing homes. Such a disproportionally high increase in air pollution will have unthinkable implications for the children of our community. If the government has set targets to reduce air pollution then it does not make sense to allocate such a vast proportion of the overall planning to one area, along one road, where the pollution in the air will become concentrated and toxic. Economic growth The increased housing allocation within the Local Plan is based on projected economic growth, however as both the Inspector and the Council have acknowledged this calculation on based on assumptions. I would like to quote Councillor Sutherland when he addressed the Cabinet during a meeting on the 14th October 2019; "There were not many opportunities for the Council to make decisions in Planning, and once greenbelt sites were built on, there would be no opportunities to change this which would have a lasting impact on Calderdale. In essence, what were the tangible benefits on these sites and how would these be balanced and tested? - "With no evidence on economic growth, Green belt land is proposed to be developed which is unjustified. In a perverse way, residential dwellings close to industrial buildings will have a negative impact such as Sia Fibril/ Bosch. This is due to employer being unreasonably constrained to invest in the site due to emission legislations. The existing stack would be approximately 50m from the proposed site. The result could see a major employer to the area leaving Calderdale to develop an alternative site which does not support employment growth. The development will impact on access to open space which will negatively impact on mental health. Amenities Paragraph 94 of the NPPF states that ' It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: 28 a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and b) work with schools. The Local Plan in Greetland has not seen any of this work done in relation to the local junior schools. As far as parents and the local community are aware the local school has not been consulted on the Local Plan. Due to the fact that The Greetland Academy and West Vale School are academies, they cannot be pushed to expand, this is in direct opposition to the National Planning Policy Framework, and therefore not compliant. We know that the primary school is already oversubscribed. The scale of proposed development would completely overwhelm an already oversubscribed school. Children already living in Greetland may face a situation where there is no place available to them at their local junior school. There is also a very real increased risk posed to the children of Greetland Academy, should the proposed development go ahead. The local Doctors surgery is full and so do not have the capacity to take on more people in terms of health car. Therefore the development is not sustainable with the local economy unable to support the increase in population. Flooding Calderdale has experienced how unpredictable the water system is particularly in this area, we are constantly reminded of the topography of our landscape and the surrounding areas, and the impact it already has on our lives. Over thirty million pounds has so far been spent on flood defences in Calderdale, and still we have to have the Army called in to help protect us from flood water. It is not right to build on the land in Greetland put forward in the Local

Plan. Flooding cannot be militated against in this area. The land as it stands, is helping to prevent further disaster, and must remain as it is. To even suggest altering the way in which this land functions is an inappropriate and irreversible gamble. It is not fair to gamble with the lives of the community, when the community is so opposed to it. The NPPF states that the Local Plan should take account of climate change over a long period of time, including factors such as flood risks, changes to biodiversity and landscape. The NPPF also states that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. To so dramatically change the function of the landscape of the sites put forward for development in Greetland would completely disregard the risk climate change poses to the community on the form of flooding. The entire proposed site falls within a flood zone, over a 5th is graded flood zone 3a, 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 states that ' It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: 28 a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and b) work with schools. The Local Plan in Greetland has not seen any of this work done in relation to the local junior schools. As far as parents and the local community are aware the local school has not been consulted on the Local Plan. Due to the fact that The Greetland Academy and West Vale School are academies, they cannot be pushed to expand, this is in direct opposition to the National Planning Policy Framework, and therefore not compliant. We know that the primary school is already oversubscribed. The scale of proposed development would completely overwhelm an already oversubscribed school. Children already living in Greetland may face a situation where there is no place available to them at their local junior school. There is also a very real increased risk posed to the children of Greetland Academy, should the proposed development go ahead. The local Doctors surgery is full and so do not have the capacity to take on more people in terms of health care. Therefore the development is not sustainable with the local economy unable to support the increase in population. Flooding Calderdale has experienced how unpredictable the water system is particularly in this area, we are constantly reminded of the topography of our landscape and the surrounding areas, and the impact it already has on our lives. Over thirty million pounds has so far been spent on flood defences in Calderdale, and still we have to have the Army called in to help protect us from flood water. It is not right to build on the land in Greetland put forward in the Local Plan. Flooding cannot be militated against in this area. The land as it stands, is helping to prevent further disaster, and must remain as it is. To even suggest altering the way in which this land functions is an inappropriate and irreversible gamble. It is not fair to gamble with the lives of the community, when the community is so opposed to it. The NPPF states that the Local Plan should take account of climate change over a long period of time, including factors such as flood risks, changes to biodiversity and landscape. The NPPF also states that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. To so dramatically change the function of the landscape of the sites put forward for development in Greetland would completely disregard the risk climate change poses to the community on the form of flooding. The entire proposed site falls within a flood zone, over a 5th is graded flood zone 3a, where we have seen the impact of flooding in 2015 and more recently in February 2020. The risk of severe wide area flooding is increasing and therefore remains a high risk. To build on this site would compromise the flood storage area and no surface water drainage network, 10m cordon or green roofs will mitigate the risk of flooding as we have clearly seen up and down the Calder Valley. I would consider it immoral to allow home owners to purchase new homes with the prospect of not being able to obtain sufficient house insurance due to proximity of flood zones. Black Brook is a haven for wildlife and is a UK BAP priority habitat. Any development including access roads will have a negative impact to wildlife including deer and herons even with a proposed 10 m cordon due to noise, traffic light pollution. How can the Council consider developing a green belt land with such a rich wildlife and a high risk of flooding when there are other sites available?

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1112**

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

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:

CONSIDER ALL OF THE FOLLOWING OBJECTION POINTS TO BE RELEVANT FOR ALL OF THE PROPOSED DEVELOPMENTS IN THE GREETLAND AREA- LP0026, LPO177, LPO952, LP1625. The following points cover all four sites as they are in such close proximity to each other and the negative implications are the same for each site. The local plan does not comply with the National Planning Policy Framework, at the beginning of the policy the three overarching objectives are mentioned: a) an economic objective ; to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure; b) a social objective ; to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and c) an environmental objective ; to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy. These three overarching objectives contain lots of points that the local plan fails to comply with. This greenbelt land is NOT the right type of land in the right place. The provision of the infrastructure will be considerably compromised by the local plan, the area cannot cope with increased volume of traffic on the roads. The local plan does not support communities health, social and cultural well being, by taking away an area of land that is used for walkers, children to get fresh air this is definitely the opposite. The health of the community will be compromised by the huge traffic pollution increase. It mentions 'open-spaces' in the social objective, the open-spaces in Greetland will be lost if the developments are to go ahead, thus the opposite of this point. The third objective mentions contributing to protecting and enhancing our natural environment. The local plan is on greenbelt land that would destroy the homes of the local wildlife corner, not protecting in any way! For these reasons, along with many more I do not consider the local plan to be sound or legally compliant in any way. I do not consider the plan to be sound and have the following reasons for my objections: -Greenbelt and wildlife -Pollution and traffic congestion - Flooding - Infrastructure Greenbelt and Wildlife To quote the NPPF 136 Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified . I do not believe that the reasons for the local plan are exceptional circumstances and are definitely not justified or evidenced. This land should be protected for the reasons it was made Greenbelt land in the first place. This is a wildlife corner home to many different wildlife species. This is land used by walking groups and children, it is good for health and well being to walk in the open-air and with mental health issues on the rise it is vital that this area of free space is not lost. NPPF 174 174. To protect and enhance biodiversity and geodiversity , plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and

locally designated sites of importance for biodiversity⁵⁶; wildlife corridors and stepping stones that connect them; " By building on greenbelt land the local plan is not protecting or enhancing the wildlife-rich habitats that are contained on this fabulous land. To quote the NPPF 137 137- makes as much use as possible of suitable brownfield sites and underutilised land; Brownfield sites- There are plenty of brownfield sites in Halifax that need to be considered first, I have looked at the Brownfield Register and it is not updated, showing a lack of priority for this. I do not feel that the suitable Brownfield sites have been considered first. There is a demolished mill at the bottom of Saddleworth Road, surely this should be a site for development before Greenbelt land! Pollution and Traffic Congestion 180. Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment . The location at the moment is already horrifically congested. West Vale is a bottle-neck of traffic especially at peak times. The traffic pollution created by the extra proposed number of houses will most likely cause danger to health, especially to the children attending the Pre school and Infant school on Saddleworth Road. This goes against the governments strategy on air quality. Planning and flood risk 155. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere . The proposed area of development is on an area prone to flooding. The weekend of the 10 th February saw extensive flooding in this area. There is lots of photographic evidence to show that the proposed area for development will already be prone to flooding. Where will all this water go ? The extreme current weather conditions have already proven to have devastating consequences in Calderdale. Calderdale Council have declared a 'Climate Emergency' but then are planning on building houses on flood plains, this will increase flood risks in West Vale and Elland. This is ludicrous. Infrastructure As there is only one main road in and out this is going to cause major congestion issues. The other roads into Greetland are often narrow and already very congested, such as in Norland. The proposed plans on site LP0026 will cause major issues given that already the road is very narrow and two cars have trouble passing each other as it is. If this is to be an access point for an extra 60-70 houses it will definitely cause more issues than it already does. Greetland is currently a village, not a town. There are not enough shops to deal with the amount of proposed houses. I am currently on a waiting list for the local dentist, there is already a waiting list pages long. There is not enough space at the Dentist or Doctors to deal with this vast number of new residents. The local schools are also already full. This does not comply with the NPPF statement following - 94. It is important that a sufficient choice of school places is available to meet the needs of existing and new communities The local plan will therefore have a disastrous effect on the infrastructure of Greetland itself. The local bus service is currently inadequate for the area. I worry that when my son is of high school age he will be unable to get a place on a school bus, are there plans to expand this service ? I do not believe that there is a shortage of houses in this area or an unemployment problem or an issue of homeless families ? Greetland can not possibly cope with the demands and negative impact that these developments will bring on a village. I would like to see the four sites in the Greetland area be removed from the local plan. They do not comply with the National Policy Planning Framework and are not sound.

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

Sound Reason:

CONSIDER ALL OF THE FOLLOWING OBJECTION POINTS TO BE RELEVANT FOR ALL OF THE PROPOSED DEVELOPMENTS IN THE GREETLAND AREA- LP0026, LP0177, LP0952, LP1625. The following points cover all four sites as they are in such close proximity to each other and the negative implications are the same for each site. The local plan does not comply with the National Planning Policy Framework, at the beginning of the policy the three overarching objectives are mentioned: a) an economic objective ; to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by

identifying and coordinating the provision of infrastructure; b) a social objective ; to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and c) an environmental objective ;to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy. These three overarching objectives contain lots of points that the local plan fails to comply with. This greenbelt land is NOT the right type of land in the right place. The provision of the infrastructure will be considerably compromised by the local plan, the area cannot cope with increased volume of traffic on the roads. The local plan does not support communities health, social and cultural well being, by taking away an area of land that is used for walkers, children to get fresh air this is definitely the opposite. The health of the community will be compromised by the huge traffic pollution increase. It mentions 'open-spaces' in the social objective, the open-spaces in Greetland will be lost if the developments are to go ahead, thus the opposite of this point. The third objective mentions contributing to protecting and enhancing our natural environment. The local plan is on greenbelt land that would destroy the homes of the local wildlife corner, not protecting in any way! For these reasons, along with many more I do not consider the local plan to be sound or legally complacent in any way. 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To protect and enhance biodiversity and geodiversity , plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity⁵⁶; wildlife corridors and stepping stones that connect them; " By building on greenbelt land the local plan is not protecting or enhancing the wildlife-rich habitats that are contained on this fabulous land. To quote the NPPF 137 137- makes as much use as possible of suitable brownfield sites and underutilised land; Brownfield sites- There are plenty of brownfield sites in Halifax that need to be considered first, I have looked at the Brownfield Register and it is not updated, showing a lack of priority for this. I do not feel that the suitable Brownfield sites have been considered first. There is a demolished mill at the bottom of Saddleworth Road, surely this should be a site for development before Greenbelt land! Pollution and Traffic Congestion 180. Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment . The location at the moment is already horrifically congested. West Vale is a bottle-neck of traffic especially at peak times. The traffic pollution created by the extra proposed number of houses will most likely cause danger to health, especially to the children attending the Pre school and Infant school on Saddleworth Road. This goes against the governments strategy on air quality. Planning and flood risk 155. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere . The proposed area of development is on an area prone to flooding. The weekend of the 10 th February saw extensive flooding in this area. There is lots of photographic evidence to show that the proposed area for development will already be prone to flooding. Where will all this water go ? The extreme current weather conditions have already proven to have devastating consequences in Calderdale. Calderdale Council have

declared a 'Climate Emergency' but then are planning on building houses on flood plains, this will increase flood risks in West Vale and Elland. This is ludicrous. Infrastructure As there is only one main road in and out this is going to cause major congestion issues. The other roads into Greetland are often narrow and already very congested, such as in Norland. The proposed plans on site LP0026 will cause major issues given that already the road is very narrow and two cars have trouble passing each other as it is. If this is to be an access point for an extra 60-70 houses it will definitely cause more issues than it already does. Greetland is currently a village, not a town. There are not enough shops to deal with the amount of proposed houses. I am currently on a waiting list for the local dentist, there is already a waiting list pages long. There is not enough space at the Dentist or Doctors to deal with this vast number of new residents. The local schools are also already full. This does not comply with the NPPF statement following - 94. It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. The local plan will therefore have a disastrous effect on the infrastructure of Greetland itself. The local bus service is currently inadequate for the area. I worry that when my son is of high school age he will be unable to get a place on a school bus, are there plans to expand this service? I do not believe that there is a shortage of houses in this area or an unemployment problem or an issue of homeless families? Greetland can not possibly cope with the demands and negative impact that these developments will bring on a village. I would like to see the four sites in the Greetland area be removed from the local plan. They do not comply with the National Policy Planning Framework and are not sound.

Do you consider 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 **HRU1115**

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

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 Storm Ciara on 9th Feb 2020. I have attached pictures for your reference of site number LP0177. The houses on Woodfield Grange stand very close to the flood plain as it is, I can only imagine the catastrophic damage

caused to these houses and the families that live in them if the flood plain and surrounding hill side was to be built on. As stated in the NPPF paragraph 155. ' Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.' Building on sites such as LP0592, LP0026 and LP1625 would only worsen this scenario as these areas act as a natural soak away to rain fall and surface water. If these sites were to be built on, surface water would flow directly down on the flood plain, which is already stretched during heavy rainfalls. To give you an idea of the amount of surface water on the aforementioned sites please see attached photos looking out onto the field on LP0592 which were taken on 09/02/20 only 20 minutes apart. The first at 10:45am, the second at 11:05am. Note how the swell of water has increased on the field so rapidly in that time, and how quickly that water would drain away, down the hillside and down to the new proposed housing. From there flow down towards Woodfield Grange and carry on further to the neighbouring towns of Elland and Brighouse. From the NPPF- ' 158. The aim of the sequential test is to steer new development to areas with the lowest risk of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.' - Flood plains are labelled as such for a reason, they are there to contain flood water and any breached rivers and streams. To take this away would be detrimental to the neighbouring communities. The council, and developers have obviously underestimated the severity of the flooding in this area of Greetland. Greenbelt & Wildlife Corridor As a resident of Greetland my entire life I have always been aware of how lucky I am to live in an area full of green fields, farms and moorlands. It is certainly one of the main reasons Greetland is such a sought-after place to own a property and bring up your children. Parts of the sites considered for this development are classed as sensitive Green Belt areas, and if I may quote the Government's own NPPF, paragraph 133- -" The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence." Taking these green areas away, not only goes against the government's policy by creating urban sprawl it also takes away the green and semi-rural characteristics of our village, not to mention the adverse effects the developments will have on local wildlife native to the area including herons, crested newts, bats and hedgehogs to name but a few. Below is a paragraph from the NPPF- 134. Green Belt serves five purposes: a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. To build on site LP0177 would go against each and every one of these 5 purposes of Green Belt land. In reference to point 'e' I struggle to find the reasoning behind why available brownfield sites have not been considered for this local plan. I do understand that there is a housing crisis to address, and homes do need to be built but I feel that using Green belt areas- including flood plains- is a very poor judgement from our local Council. Infrastructure Aside from the fact this development is suggested for a known flood plain and green belt area, the volume of dwellings suggested across all four sites is overwhelming and disproportionate for Greetland as a village. 600+ houses on already one of the busiest roads in the area would just cause chaos for commuters, school drop off and collection as well potentially turning Sunnybank Drive into a rat run for frustrated drivers trying to access Rochdale road to avoid queues on Saddleworth road. At peak times this road can be very busy, especially as you get closer to West Vale traffic lights and passing the infant school. Adding (I estimate) 1200 cars to this scenario not only would cause peak time traffic to swell ten-fold but also become detrimental to the health and wellbeing of the children at the Sunnybank Pre School and Greetland Academy who would be subject to the car fumes and not to mention the danger that will be posed by the increase in traffic when crossing the road. Information from the World Health Organisation states; ' One reason why children are particularly vulnerable to the effects of air pollution is that they breathe more rapidly than adults and so absorb more

pollutants. They also live closer to the ground, where some pollutants reach peak concentrations ; at a time when their brains and bodies are still developing.' As a mother of young children this subject is a major concern. West Vale is overwhelmed by traffic at all times of day, although the new eateries and drinking establishments have brought more business to the area and West Vale is a hive of activity it does mean most days there is slow moving traffic through both sets of lights. Adding to this volume would make West Vale virtually impassable at peak times. Another concern is services and amenities. The local schools are already at capacity as are the doctor and dental surgeries and would not cope with the demand from extra patients or students.

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

Duty to Co-operate Reason:

little or no information about the proposals

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609718>

Comment ID **HRU1116**

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

Person ID: **1243878**

Name: **Mrs Claire Zoledziejewski**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Risk of Floods's This terminology is used a few times on the proposals. I would suggest this is edited to read 'certainty of floods'. The areas closest to Black Brook on the flood plains have done exactly that for many years, more notably during the 2015 Boxing Day floods that blighted our region and during Strom Ciara on 9th Feb 2020. I have attached pictures for your reference of site number LP0177. The houses on Woodfield Grange stand very close to the flood plain as it is, I can only imagine the catastrophic damage caused to these houses and the families that live in them if the flood plain and surrounding hill side was to be built on. As stated in the NPPF paragraph 155. ' Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.' Building on sites such as LP0592, LP0026 and LP1625 would only worsen this scenario as these areas act as a natural soak away to rain fall and surface water. If these sites were to be built on, surface water would flow directly down on the flood plain, which is already stretched during heavy rainfalls. To give you an idea of the amount of surface water on the aforementioned sites please see attached photos looking out onto the field on LP0592 which were taken on 09/02/20 only 20 minutes apart. The first at 10:45am, the second at 11:05am. Note how the swell of water has increased on the field so rapidly in that time, and how quickly that water would drain away, down the hillside and down

to the new proposed housing. From there flow down towards Woodfield Grange and carry on further to the neighbouring towns of Elland and Brighouse. From the NPPF- ' 158. The aim of the sequential test is to steer new development to areas with the lowest risk of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.' - Flood plains are labelled as such for a reason, they are there to contain flood water and any breached rivers and streams. To take this away would be detrimental to the neighbouring communities. The council, and developers have obviously underestimated the severity of the flooding in this area of Greetland. Greenbelt & Wildlife Corridor As a resident of Greetland my entire life I have always been aware of how lucky I am to live in an area full of green fields, farms and moorlands. It is certainly one of the main reasons Greetland is such a sought-after place to own a property and bring up your children. Parts of the sites considered for this development are classed as sensitive Green Belt areas, and if I may quote the Government's own NPPF, paragraph 133- - "The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence." Taking these green areas away, not only goes against the government's policy by creating urban sprawl it also takes away the green and semi-rural characteristics of our village, not to mention the adverse effects the developments will have on local wildlife native to the area including herons, crested newts, bats and hedgehogs to name but a few. Below is a paragraph from the NPPF- 134. Green Belt serves five purposes: a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. To build on site LP0177 would go against each and every one of these 5 purposes of Green Belt land. In reference to point 'e' I struggle to find the reasoning behind why available brownfield sites have not been considered for this local plan. I do understand that there is a housing crisis to address, and homes do need to be built but I feel that using Green belt areas- including flood plains- is a very poor judgement from our local Council. Infrastructure Aside from the fact this development is suggested for a known flood plain and green belt area, the volume of dwellings suggested across all four sites is overwhelming and disproportionate for Greetland as a village. 600+ houses on already one of the busiest roads in the area would just cause chaos for commuters, school drop off and collection as well potentially turning Sunnybank Drive into a rat run for frustrated drivers trying to access Rochdale road to avoid queues on Saddleworth road. At peak times this road can be very busy, especially as you get closer to West Vale traffic lights and passing the infant school. Adding (I estimate) 1200 cars to this scenario not only would cause peak time traffic to swell ten-fold but also become detrimental to the health and wellbeing of the children at the Sunnybank Pre School and Greetland Academy who would be subject to the car fumes and not to mention the danger that will be posed by the increase in traffic when crossing the road. Information from the World Health Organisation states; ' One reason why children are particularly vulnerable to the effects of air pollution is that they breathe more rapidly than adults and so absorb more pollutants. They also live closer to the ground, where some pollutants reach peak concentrations ; at a time when their brains and bodies are still developing.' As a mother of young children this subject is a major concern. West Vale is overwhelmed by traffic at all times of day, although the new eateries and drinking establishments have brought more business to the area and West Vale is a hive of activity it does mean most days there is slow moving traffic through both sets of lights. Adding to this volume would make West Vale virtually impassable at peak times. Another concern is services and amenities. The local schools are already at capacity as are the doctor and dental surgeries and would not cope with the demand from extra patients or students.

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

Duty to Co-operate Reason:

little or no information about the proposals

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609719>

Comment ID **HRU1120**

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 a flood zone. It is devastating to see this plot regularly flooded after short periods of heavy rainfall, which already threatens adjacent homes and undoubtedly impacts further downstream in West Vale and Elland Bridge, a bridge which partially collapsed in the floods of 2015, costing £5 million to rebuild and this closed a vital traffic route for almost 2 years. The ludicrous plans to build on this land absolutely beggars belief on these points alone. The land also provides essential habitat for our wildlife; we regularly see deer, owls and bats in the fields alongside Saddleworth Road. The traffic along Saddleworth Road is already very heavy; we have a large volume of heavy goods vehicles and tractors frequently using this road and congestion is a daily occurrence around the Greetland Academy School. The road is also used by commuters when the M62 motorway has closures. The noise from the current level of traffic along Saddleworth Road is already considerable. This noise and air pollution would increase dramatically if these plans go ahead. The young children attending the primary school alongside this road would bear the brunt of this air pollution. This land is an integral part of the community at Greetland. This plot is popular with families for walks. 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 **HRU1122**

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

Person ID: **1243884** Name: **Mr Andrew Zoledziejewski** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

I am writing to object to the proposed plan to build on the following sites: "Ç LP0592 (New gate farm) "Ç LP1625 (Silverdale terrace) "Ç LP0177 (Ellistones place) "Ç LP0026 (Gate farm). GREENBELT. These areas are a natural soak and any removal of the floodplain in any capacity would be catastrophic further into West Vale, Elland and Brighouse if this was to disappear the significant loss of greenbelt is extremely worrying. These plots are in a semi rural location and any loss of this greenbelt would create urban sprawl and an extreme lack of green spaces for recreation and not to mention habitats for local wildlife. INFRASTRUCTURE. With Greetland already upto what many would say call full capacity anyway, I have no hesitation in saying that I any of the proposed sites are used for housing development this will be a complete failure in planning, location and the necessary need for houses in any capacity. The schools are already full, the local doctor surgeries waiting times can't count cope with the demand for local area present. Traffic is utter chaos in West Vale, which is an area which cannot be avoided to get to any of the areas in the local Ward. Throw another estimated 1200 cars into the mix if the proposed 600 homes do go ahead and is simply will not work, its barely passable at peak times at present. DISPROPORTION OF HOUSING SITES. The sheer scale and disproportion of the number of homes to build on a single stretch of road is shocking. Why has such a large amount earmarked for such a concentrated area and Greenbelt area at that, when the Ward consists of greetland elland stainland and holywell green. We're supposed to be promoting development on Brownfield first yet in calderdale as a whole you're telling me that every single area of Brownfield has been exhausted and this is the only viable solution. I find that very hard to believe. I understand the need for housing development to be built at this time that I urge you to remove these 4 sites. As time goes on even without the housing development going ahead there is a significant increase in cars on a road. More extreme weather conditions which test our floodplains on a more regular basis. I really think you should reconsider as this will only be made worse and a scale I cant even imagine as the scenes of devastation from the floods on a few weeks ago in west vale and elland alone were beyond belief. When these Greenfield areas go they dont come back and a functional Greenbelt at that, which is what these 4 sites mention are. Please find enclosed photos of evidence of the flooding which occurred on the 09/02/20. And the need to preserve these natural soak always and floodplains. THE GOVERNMENT. The Government attaches great importance to greenbelt, the fundamental aim of greenbelt policy is to prevent urban sprawl by keeping land permanently open. Green Belt serves 5 purposes: a) to check the unrestricted sprawl of large built up area. ***this local plan merges greetland into surrounding areas. b) to prevent neighbouring towns merging into one another. c) to assist in safeguarding the countryside from encroachment. ***the local plans 600 proposed homes in semi rural locations which provide habitats for local wildlife. d) to preserve the setting and special character of historic towns. e) assist in urban regeneration, by encouraging the recycling of derelict and other urban land. ***not all brownfield has been exhausted in calderdale, not even close. Brownfield site just half a mile down the road in west vale, and former Hanson brickworks in elland yet they decide to build on a green belt floodplain.

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

Duty to Co-operate Reason:

Little or no information about proposals.

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609728>

Comment ID **HRU1139**

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:

**Positively Prepared 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 **HRU1143**

Site ref (if applicable):

Person ID: **1243894**

Name: **mr Justin Hirst**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

In my opinion the Council have failed to meet its three core principals of Community Involvement namely, Clarity, Inclusivity and Integrity. If it was not for the support of the local community many people would be unaware that the sites have been put back into the Local Plan and that a further consultation period has been made. Exactly what is expected of the general public is also unclear. Phrases such -“Is this Sound” have very little meaning to general public. The use of acronyms, legal and planning -“jargon” make the plan far from user friendly. I do not know how the -“average lay person” can be expected to form a clear and sound argument. With this in mind I would say that the plan is not at all -“inclusive” and as such would exclude a number of people from being able to express their opinions. The Local Plan Website is extremely challenging to navigate, even for the most computer literate. The Council are showing very little Integrity, with local Councillors and the community not being kept up to date with what is happening. The council has also failed to listen to the community in compiling the plan. Residents were asked to comment on the removal of this site (LP0177) from the Green Belt in 2015 and then on its inclusion in the Local Plan in 2017 . In both instances the overwhelming response from the community was that the land should not be in the Local Plan and should remain within the Green Belt. The sites in Greetland got the highest number of comments compared to the rest of Calderdale. Despite this, the Council, after initially removing the site, has now put it back into the Local Plan with no sound reasoning to support its actions. In addition, concern has been expressed by residents, as to why Greetland has been classified as part of Elland. Greetland is completely separate from Elland and it is misleading for the two areas to suddenly be -“consolidated” Residents of Greetland, on reviewing the Local Plan would have no reason to -“look under” Elland and would miss the opportunity to put forth their comments. Within the -“Settlement Hierarchy” the villages of Greetland/West Vale are not even listed, but the villages at either end of the Greetland (Holywell Green and Barkisland) are listed as Neighbourhood/Small rural areas. In connection with this, there are also questions as to true increase in the amount of housing stock for the Greetland area. In the Councils calculation for -“Distribution of House Growth” Table 3 Infrastructure Delivery Plan

2019) it shows Greetland, along with Elland, Holywell Green & Stainland to have a growth of 8.21%. However, if Greetland and West Vale are viewed on their own ; which they should be ; using the latest Polling District Figures, the increase in housing stock is around 20%. This is too much for a village of this size and with such limited infrastructure. The Council also appear to have -“gone against” a number of policies set out in the National Policy Planning Framework such as: When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations . The council have not demonstrated that development of this Green Belt will outweigh the harm. The Council have simply created a vague list of possible ways to -“mitigate” problems, most of which have no concrete or sound basis and in some cases are just totally incorrect. When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. The land proposed for development is used as a natural storage area which controls the amount of water going down to Black Beck and ultimately helps prevent even more flooding down the valley. In addition, the targeting of non Labour wards (both Liberal & Conservative) within Calderdale, whilst not illegal, is highly suspect at worst.

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

Sound Reason:

LOSS OF GREEN BELT The site is currently designated as being in an area of Green Belt and in a recent survey it was seen to perform well in 3-5 areas. This area of Green Belt is also classified as being highly sensitive. In 2018 the Council deemed that this area of land was of such significantly high importance that it should be removed from the local Plan and yet now feels that the land is suitable for development. The council have not demonstrated any sound reason for this reversal, other than more land is required. The council have also failed produce any evidence, to show that all available Brownfield sites have been exhausted. Indeed, when challenged, they seem unable to produce any current information with regards to Brownfield availability. Their requirement to maintain a Brownfield site register with an annual update has failed (last update was 2018) so it is impossible to see what brownfield sites exist as potential alternatives. Removal of this Green Belt land could, set the precedence for removing even more of the land from the Green Belt and for development to take place all along the valley. Any development of this Green Belt area would have a major impact on the landscape and dramatically change the character of the locality forever. If Calderdale have determined that Greenbelt land of significantly high importance is now building land, then all land in Calderdale, Greenbelt, Sites of Special Scientific Interest, flood plains should also now be considered as building land. The development of this area would also mean a considerable loss of Open Space. The Council have stated in their report that removal of this land would have -“no loss/no impact” on the area. There seems to be no consideration that taking the Saddleworth Road Development as a whole, would mean a loss of nearly 25 hectares of open Green space which would have a detrimental effect on the local community. The site two public rights of ways going through it. They are 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. Whilst the developers have stated that rights of way 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 40mg/ limit, which has been set by the Council. More traffic will only increase these numbers which will be against their own targets.

INFRASTRUCTURE The MP for Calderdale 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. 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 9 uncertain impacts, 4 negatives and only 3 positives. When read in detail I would even question the validity of some of these -“positive” impacts and suggest they are more suited to uncertain or even negative. Given the amount of uncertain and negative points raised, I would question the validity of recommending this site as a suitable and sustainable area for development. Whilst we have been told that each site must have a separate and different submission it has been nearly impossible to do this as each area of land is next to each other. Indeed, to consider each site in isolation is not taking into account the full impact of developing over 24hectares 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:

Engagement with residents has been almost minimal. no letters to home, only internet portal notifications. if someone is without internet, how exactly are they supposed to be engaged.

Suggested Modifications:

exclude from plan update the brownfield register. FORCE developers to take brownfield sites. Once ALL exhausted then greenfield allocate all around the Calderdale area rather than focusing such a large number one one area. actually put similar number within Labour held wards.

Comments:

Additional Evidence Link:

Comment ID **HRU1148**

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

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 Greetland will 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 its 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, 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:

Identify brown site areas first.

Comments:

Additional Evidence Link:

Comment ID **HRU115**

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

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/5594669>

Comment ID **HRU1160**

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

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:

The Local Plan does not address the implications of the National Planning Policy Framework, especially, NPPF Para 177 and the associated PPG in the Sustainability of Greenbelt Sites. According to the NPPF Para 143 under 'Proposals affecting the Green Belt' it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' The very special circumstances are non-existent in this site. This development would definitely contribute to future flooding in the area. The plans have in no way had any in-depth consideration and the impact on the infrastructure, environment and community will be devastating. One of the Greetland councillors - Marilyn Greenwood stated that she was not even told about the Planning Meeting when this plot was added! Greetland Academy has the playground for nursery children right at the side of the road; and you can only guess how the proposed development will impact on these vulnerable, very young children which goes against the Government's strategy on air quality.

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

Sound Reason:

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

West Vale and the development will only add to the congestion both in West Vale and also Ripponden. Once there is a problem on the M62 then this just increases the stress on the road systems causing massive queues which also then increases the deterioration of the air quality 6 Loss of Public Space The area concerned is a very valuable green space for people of all ages to enjoy daily and is extremely popular with walkers, runners, etc. It is a really tranquil spot where people can get away from the stresses of life. Which helps relieving psychological stress on people and ensuring a more rounded and healthy lifestyle. It is also within walking distance of the local community and therefore people do not have to drive to enjoy the countryside.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1188**

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 **HRU119**

Site ref (if applicable):

Person ID: **1241743**

Name: **Mrs Sally Ewing**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

This development would be built on Green Belt land which is also liable to flooding. Both of these issues have been raised by Government as areas to avoid for future development. There are other sites across Calderdale which should be considered first and evidence all Brown belt sites have been incorporated.

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

Sound Reason:

There is no infrastructure to support building of this scale in the local area. School applications would result in children within Greetland at the other side of Rochdale Road being able to secure a place at their village school. Congestion in the West Vale junction directly below is already hugely stressed at peak times, further traffic would result in standing traffic outside the Greetland Academy School and Sunnybank Preschool, impacting air quality significantly. This traffic would extend into air quality around the West Vale school also as it navigates the two junctions.

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

Duty to Co-operate Reason:

No justifiable reason to build on Greenbelt land at this point. No justifiable reason to exacerbate an already flood prone site. The plan is meant to result in large-scale housing being focused in towns with good transport links and infrastructure, neither of these exist at the proposed site.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1193**

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 involves allowing development on Greenbelt land. These areas have been and should continue to be protected and not sold on in order for people and businesses to make money. There is no good reason why this land needs to be used for housing. The environmental impact will be staggering, not only to the local wildlife but also the community. Our environment should not be lost due to the profiteering of big business.

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

Sound Reason:

The areas for housing seem to sit within the Greetland area, there are no houses planned for the Stainland area. The impact that building these houses will impact on the local community for years to come. This is not a right here and now issue, this will be detrimental to the community and environment for years and years to come. Problems such as higher water, air and noise pollution, increased traffic, more fatalities, increased car dependency and dependency on roads and public transport that are already insufficient. Traffic congestion is getting worse and worse, on both Rochdale and Saddleworth roads. There is no way of making this better for current residents so building 600 houses is simply going to make this worse. Air pollution will affect residents massively. By increasing the number of cars and the number of car journeys, this is simply going to make a problem even worse. The schools and local Surgeries are already full, the sewers are already flooding. The areas around the four sites is Grade 3 agricultural land which, by Calderdale's own recognition, is an important commodity in light of climate change. The Woodland Trust has just supported the donation of over 100 trees that are recommended for this area. The fields have natural springs which run through the sites. By digging these up, in order to build houses, there won't be anywhere for this running 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:

I don't feel that Calderdale Council have done enough to make residents aware of the proposed housing plan. As a resident, I only found out about the proposed build through friends and parents at school. The council website is not easy to use and navigate. This is my fifth attempt at submitting my objections to the proposed plan. The website repeatedly crashes or doesn't let you log in.

Suggested Modifications:

The four sites LP0026, LP0952, LP0177 and LP1625 be removed from the plan.

Comments:

Additional Evidence Link:

Comment ID **HRU1199**

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. The community walk the paths along the river. Having somewhere away from noise, cars and pollution is crucial for our wellbeing. To take away these footpaths and open spaces is to deny our young people the opportunity to enjoy the countryside and open air in a safe environment. Infrastructure ; The sewer system is at capacity already. Greetland may have sufficient school places to meet the needs of the existing community but it certainly doesn't for 600 more families. The schools in this area are Academies and can't be forced to expand, this would mean parents using their cars to transport their children to school. The roads into West Vale are already unable to cope with the volume of traffic. All doctors and dentists are full. I have been living in Greetland for 11 years and travel to Ripponden to the doctors and have only just received a place at the dentist in West Vale in December. Air Pollution ; West Vale and Ripponden are already unable to cope with the volume of traffic during rush hours. Saddleworth Road outside the KS1 site of the Greetland Academy is an accident waiting to happen. Cars are double parked from the Nursing Home all the way up past Sunnybank Drive. The volume and speed the HGV travel up and down Saddleworth Road to the Sonoco factory and Bosch factory is already a high risk to children walking to and from school. More traffic on these roads would not only increase the risk of accidents but also the increase in air pollution would cause a serious health risk to the children both walking to school and those already at school playing in the grounds. The increase in air pollution ignores the recommendations of PHE. Children aren't just walking to Greetland school down Saddleworth Road but children walk to Brooksbank High School, the children are all walking where there will be a constant que of vehicles, where the pollution would be harmfully concentrated. Flooding ; 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. Part of this site is a flood plain for the brook. to build anything on this area is simply irresponsible due to the effect it could have on both the residents of any new houses and the residents of existing houses in the vicinity. 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 (or anything else) is built on these fields then the water will simply run off and flood the area below more rapidly.

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 **HRU120**

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

Person ID: **1241752**

Name: **Mrs Julie Connor**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Lack of due diligence. The national planning Policy framework set out strict policy tests, which all local planning are expected to follow in both Plan making and decision making. this is an inappropriate development as it is in a area that is at risk of flooding.

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

Sound Reason:

Duty of care not taken. Other more appropriate sites have not been explored they is no infrastructure to support this number of houses. Increase in Air Pollution Decrease in Air Quality Air pollution is damaging our health and the environment and the increase in air pollution from these additional houses is going to increase dramatically. Damaging our health and the environment. Greetland Academy is adjacent to this site and very close to the main Road, which at busy times is very congested. The Children will be effected by increases in emission from the increased volumes of traffic created by the proposal of this Housing Estate. Nitrogen dioxide, which is a major component of air pollution can irritate and inflame the lining of your airways causing Respiratory conditions. -"People living, working or going to school in local areas could be exposed to dangerous levels of Nitrogen Dioxide across the year. Research from 2017 showed that in the UK over 2000 nurseries, schools, further Education Centres and after school clubs in England and Wales were within 150 metres of road with levels of nitrogen dioxide broke the law" (British Lung Foundation www.blf.org.uk) The construction of this site will generate air and noise pollution. Most of these new houses will have at least one or two cars and even the modernist of cars still omit these dangerous pollutants. We cannot neglect the Health and wellbeing of our future generation. This proposed site is in the wrong location. ,Risk of Flooding and effect this could have on Elland and surrounding area's. (Ref:- <https://flood-map-for-planning.service.gov.uk/confirm-location?easting=409015&northing=420956&placeOrPostcode=HX4%208NZ>) There is strong photographic Evidence of this site being flooded in 2019 may I remind the local council that they have a duty of care to take this evidence on board. The National Planning Policy Framework set out strict policy tests, which all local planning are expected to follow. For both plan- making and decision-making, -"inappropriate developments should be avoided by directing development away from areas most at risk of flooding." The Climate Change Act 2008 requires local Authorities to take proactive steps to mitigate and to adapt to

climate change. Local Authorities, the Environmental Agency and other prescribed bodies are obliged to work together in relation to area-wide strategic flood risk planning under the -“duty to cooperate” in the Localism Act 2011. The proposed site is at the base of a valley a natural area where excess water collects. Effect on the wildlife The proposed site is a natural habitat for wildlife heron, foxes, squirrels frogs toads and newts, on a couple of occasions I have personally seen a deer, Birds such as Jays, woodpeckers, robins, blue tits and owls are seen in this area. Various species of fish are found in black brook. This construction project will damage natural habitat threatening wildlife, Risk of Pollution to watercourses : Soil, waste concrete and toxins in runoff from construction sites or fuels, accidentally spilled during storage or delivery, can enter watercourses. Fine sediments from the bottom or sides of streams can be mobilised during in-stream construction. These pollutants can affect aquatic habitats, plant life, invertebrate and all life stages of fish. This site is currently used for recreation. Dog walkers use the proposed site frequently every day; various rambler's and Stainland lions who run safely on the public footpath also use it. Black brook is used for recreation by Greetland Academy for its annual and traditional -“Duck Race”

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

Duty to Co-operate Reason:

The climate Change Act 2008 requires local Authorities to take proactive steps to mitigate and adapt to climate change. Local Authorities, the environmental Agency and other prescribing bodies are obliged to work together in relation to area-wide strategic flood risk under the "duty to cooperate" in the Localism Act 2011 This is clearly a flood risk and there is strong photographic evidence of the site being flooded, may I remind the council they have a duty of care to take this on board.

Suggested Modifications:

consider an alternative site. Brownfield Industrial site available A redundant brownfield site is available for redevelopment. The mill has been demolished at the west vale traffic lights and there was a proposal for a - “Retirement complex” to be developed. Why is this not part of the local plan, It will bring increase the economic growth to the area the residents are unlikely to have more than one motor vehicle they will not be commuting on the M62 therefore reducing the road congestion. In general, they will have more disposable income to spend locally, and there will be no impact on the local schools and a lower impact on the environment.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5594681> ; <http://calderdale-consult.objective.co.uk/file/5594818> ; <http://calderdale-consult.objective.co.uk/file/5594816> ; [http://calderdale-consult.o](http://calderdale-consult.objective.co.uk/file/5594819)

Comment ID **HRU1208**

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

Person ID: **1243919**

Name: **Mrs Sara Cooley**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Building on flood plains and green belt land is not part of government policy as shown in the NPPF and PPG. The land in this proposed site is always sodden, even in the height of summertime. It is unthinkable to imagine the impact that covering this natural soakaway with tarmac & concrete will have. The recent Storm Ciara left the fields full of water as huge amounts of rain ran down the hill towards Black Brook. The current houses on Woodfield Drive narrowly escaped flooding inside their homes. Without the natural soakaway, these houses will almost certainly flood. The impact will be felt further downstream in West Vale, Elland and onto Brighouse. The impact on wildlife will be dramatic. Herons, kingfishers, deer, badgers & bats are amongst many species who call the trees & fields around Black Brook their home. There is no doubt that many of the animals will leave their homes here permanently due to the disruption caused by construction of new houses. The proposed development will also affect local residents who will no longer be able to enjoy the tranquil, natural countryside on our doorsteps which is one of the reasons many people choose to live here. The proposed public recreation area shown on the developer's map will be unusable due to the water run off from the housing development. It should be noted too that the developer's plan does not include the green roofs that are mentioned in the site specific considerations.

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

Sound Reason:

POSITIVELY PREPARED I do not believe the plan is positively prepared since local infrastructure, including but not limited to, schools, health care & local roads will be able to cope with the increased population in the local area. All local schools are currently running at full capacity and there is no consideration in the plan to extend current schools or build new ones. Traffic will be especially affected since the majority of journeys will be on or around Saddleworth Road. There are few employment opportunities available with walking distance of the proposed development so new residents will need to commute at peak time adding to the already gridlocked traffic in West Vale. This would mitigate the future gains made by the improvements to the A629. Saddleworth Road is also used by many large lorries travelling to and from the Sonoco Recycling plant, local quarries & Bosch factory among others. More traffic would impact these businesses. Public transport is very limited in the area with only 1 bus per hour between Halifax & Huddersfield in each direction. This is not enough to tempt people out of their cars for commuting. The increased in traffic, particularly gridlocked traffic, will negatively affect air quality. This is especially important as the local infant & junior schools are situated next to main roads. This contravenes government policy on air quality. This also contravenes Calderdale Council's commitment to preventing climate change.

EFFECTIVE There is a disproportionate amount of development proposed for Greetland. At the last census Greetland had a population of 11,389 which means that, should all the proposed sites be added to the local plan, the population of Greetland will increase by at least 15-20% in a short space of time which is neither practical nor an effective way to provide sustainable development. Greetland has already undergone significant development in recent decades with the developments of Templars Close, Daleside, Trenance Gardens, High Meadows & Bankfield Grange to name a few. With each development residents see a change to the water courses down the valley. A development on the scale of that proposed here could be catastrophic for many residents locally and further afield in West Vale, Elland & Brighouse.

NATIONAL POLICY As stated previously, building on flood plains and green belt land contravenes government policy. The green fields on this proposed site did a great job recently of holding large volumes of water preventing flooding in houses locally and further afield.

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

Duty to Co-operate Reason:

I have had no formal communication from the council regarding these changes to the agreed Local Plan. Neither have I seen any publicly posted notices with the exception of posts from Calderdale Council on

Facebook. I am concerned that there are many residents who are unaware of these proposed changes to the agreed local plan.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1224**

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

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 very special circumstances.' The very special circumstances are non-existent in this site. This development would definitely contribute to future flooding in the area. The plans have in no way had any in-depth consideration and the impact on the infrastructure, environment and community will be devastating.

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

Sound Reason:

Greenbelt The greenbelt land in Greetland is classed as highly sensitive on the Local Plan and has been designated as a "wildlife corridor". It is important to all and used by many. There are fields leading down to the Black Brook where wildlife (some of it protected) including deer, badgers, herons, barn owls, woodpeckers, kingfishers and bats thrive. The river, trees and farmland provide amongst other activities space for family walks, cyclists, dog walkers, nature rambles by local children. Surely we do not want to lose this space? All of this would be lost should the 600+ properties be built on the green belt land identified. The revisions to the plan (i.e. the addition of the new sites) proves further unsustainable development with a disproportionate amount of new homes proposed across four sites in Greetland with 1,041 additional units of the 1,708 on new housing sites (over 60%) proposed in the Elland area. There are previous plans for a greenway to be extended along the wildlife corridor so that more residents can take advantage of the nature offered by Greetland. Let's do this! I also refer to the National Planning Policy Framework (NPPF) Feb 2019 para 137, point c which covers that building on greenbelt should only be considered in exceptional circumstances. I ask - "Has brown field development in this area really been exhausted?" Can we not re-utilise these sites ahead of greenbelt (for example the plot where a mill has been demolished at West Vale). There would be an increase in noise and light pollution spoiling the rural aspect of our village. Air Pollution The Clean Air Strategy 2018 quotes that while we do need to ensure economic growth, we also need to realise the cost of air pollution on health. The recent research commissioned by Public Health England shows that air pollution affects the population by increasing health and welfare costs by up to £18.6bn by 2035. It is found that the single biggest air polluter is traffic. Such building along Saddleworth Road would lead to an increase in the traffic heading through West Vale traffic

lights. Calderdale Council are aware that the traffic volume at West Vale is already at 117% with daily queues already leading back from the traffic lights up as far as the school. Surely the traffic fumes and sheer volume of more impatient drivers is a risk to the safety, health and wellbeing of the 4-7 year olds who attend the Sunny Bank Annex of Greetland School? We are already waiting for an accident to happen here or from increased volume of traffic further through West Vale at the West Vale School. Flood Plain Do we really want to build on this land which has proved in the past to be subject to flooding from the Black Brook? Calderdale have declared climate emergency! I attach my photograph to show the recent flooding effect on this plot. It seems irresponsible to build here when such flooding would lead to insurance being unavailable followed by questions around why Calderdale Council allowed building here. -"I understand that Councils are stuck between the Government demands for housebuilding and the difficulties of identifying suitable sites however I urge you to look at the planning policy and the relationship between housing numbers and the pressure of flooding"

Cllr Swift. The current village of Greetland is built on a hillside and there are hundreds of springs which appear after heavy rain throughout the year. These springs have increased in volume and quantity since earlier building projects in the Greetland area. All of this excess water heads down through the areas identified for building on their way to the Black Brook. With buildings in the way there will be huge impact both locally and further downstream at Elland Bridge. The water has nowhere else to go! Diverting these springs leads to flooding of land which has not been flooded before. According to www.environmentlaw.co.uk 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 **HRU1234**

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

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:

Site reference number (if applicable) LP0026 Legal Compliance Do you consider the plan to be Legally Compliant. No The plan is not legally complacent as does not comply with the NPPF Sound Do you consider the plan to be Sound. No 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 the plan to be Sound?: **No**

Sound Reason:

It is not sound as 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:

Suggested Modifications:

I would like the local plan removing as it doesn't comply with the NPPF

Comments:

Additional Evidence Link:

Comment ID **HRU1246**

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

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 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 **HRU1251**

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

Person ID: **1243930**

Name: **Mrs June L Wilkins**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

This plan severely compromises Green Belt, contributing to urban sprawl and violating the principle of protection of our green spaces. The need for housing is not extreme or exceptional enough to warrant encroachment on to Green Belt. The council should look at smaller brownfield sites to meet NECESSARY housing and give more consideration to more moderate and environmentally sustainable schemes. Economic and growth consideration, while important, should not be allowed to increase the built up environment when a level of sustainable development is possible without this large scale estate building on Green Belt.

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

Sound Reason:

1. The plan does not sufficiently protect the natural environment. It does not conserve and enhance

biodiversity. The area specified for building runs very close to the Black Brook where I have seen Kingfishers, Herons and Dippers. There are trout in the river and frogs in the wet areas around it. The proximity of humans and their buildings, cars, noise, etc in such large numbers would inevitably result in wildlife being put under pressure. The owls which are often heard nearby would have to search much further afield for their prey as the number of small mammals would inevitably reduce. Planting a few extra trees and improving the footpath just won't look after our biodiversity. 2. Local residents use this area for recreation. It provides a very necessary place for the community to access a green space and walk or run etc helping to keep them fit and healthy both physically and mentally. Access to other walking in this area means walking on busy roads on hard pavements inhaling car fumes, or up hills which elderly find hard, or alternatively getting in a car and driving to somewhere to walk. Not everybody has access to cars and this is not environmentally friendly. Quality of life for the existing community is as important as planning for growth. 3. Saddleworth Road is very busy at peak times and there is often a long stationary queue of traffic leading up to West Vale crossroads. A development of this size with the increase in the number of cars would be polluting and noisy. 4. Flooding. This proposed development would be on very wet water meadow which floods near the river regularly in periods of heavy rain. The recent storms and the resultant flooding serve to illustrate this. While buildings would not in themselves increase the amount of rainfall, the absence of the fields to help absorb and hold it back could lead to surges in the river level and have detrimental effects further long the water network. Elland Bridge had to be reconstructed at great cost following the storms in 2015 and was partially blocked again this year, surely we don't want to have to go through that or similar events again?

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

Duty to Co-operate Reason:

Councillor Marilyn Greenwood says was not informed of the planning meeting at which this version of the plan was discussed.

Suggested Modifications:

1. The size of the development to be aggressively reduced to take the houses and the associated infrastructure well away from potentially threatened wildlife habitat, to reduce the amount of traffic using Saddleworth Road and keep emissions and noise down, to keep most of the water meadow to help protect against future flooding, to allow enjoyment of a green quiet landscape for all. 2. The Council to explore further the preferable option of smaller sustainable brownfield sites, even if it costs more to develop. Once our green space has gone it has gone. We should not throw it out because it is cheaper for a large construction company to build on open land.

Comments:

Additional Evidence Link:

Comment ID **HRU1281**

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

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/5609749>

Comment ID **HRU1286**

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

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 **HRU1293**

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 the Greenbelt Land within these proposed development sites to act as a natural soak away and flood defence. Losing these flood plains would cause the water to simply be diverted elsewhere, causing certain flooding further down the area. The natural flood plains are nature's own defence mechanism why oh why would you take these away? The frequency of flooding is only set to increase with the change in weather conditions we are experiencing through global warming. The natural flood plains are therefore becoming increasingly important to our communities. To build on these sites would not only guarantee flooding issues and untold misery for residents and local businesses but cause increased expenditure for the council and local authorities as they will be required to assist with clean up operations, as has been seen over the last week or so in many parts of Calderdale. Loss of wildlife habitats There is an abundance of wild deer running through the fields, I witness the deer every time I walk my dog on the footpaths of the proposed sites. Along with the deer we have the beautiful kingfisher, heron, squirrels, pheasants, badgers, bats and foxes in the area. Building on the land would remove the habitats of this wildlife, therefore the wildlife would disappear. It saddens me to think my children would no longer witness nature in their community. Lack of infrastructure Greetland Academy is already full. The dentist in West Vale is full for NHS patients. The GP surgery often can't accommodate appointments. Adding an additional 600+ houses is just beyond belief on how the aforementioned will cope. The local roads are already riddled with potholes and are constantly patched. They are constantly under repair as the local drainage system is ineffective and

causes regular surface issues. Add to that a level of increased traffic caused by the development as proposed and the road conditions will be worsened even further. Traffic congestion, air pollution and noise pollution Greetland and West Vale already suffer chronic traffic congestion, with the roads used not only by locals but also by the large wagons travelling to and from the Bosch Industrial Estate and the Sonoco factory. In addition, the road is used as a cut through from Ripponden and the M62. The village is already at breaking point at peak times and the roads cannot cope with the existing volume of traffic, let alone adding to that with these proposed developments. If you have a journey to Elland you need to allow yourself an 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 causing accidents and the safety of families is at risk. 600+ houses equating to on average 2 cars per family, this would be truly engulfing for the local roads. By increasing the congestion in the area, the air pollution will by default increase. This will especially have enormous impact on the young children attending the schools in the area. The playground of Sunnybank Pre-school runs adjacent to 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/5609754>

Comment ID **HRU13**

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

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/5578588>

Comment ID **HRU130**

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

Person ID: **1241732**

Name: **Mr. Cory Greidanus**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

See reasons below.

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

Sound Reason:

Main points of Objection : Flooding Risk Loss of large area of Green Belt and Wildlife Corridor Current Chronic Congestion in West Vale, and the effect on Air Quality Lack of Infrastructure 1. Flooding Risk The risk of flooding to the Greetland and West Vale areas, as well as further downstream into Elland, are of paramount importance in my objections to development on this site. I have lived adjacent to the site in question for the past 18 years, and can confirm that it floods regularly, and often 2 or 3 times in the same year. I am attaching photos that show some of the more severe flooding, photos taken in 2004, 2007, 2012, 2015 and 2019. As the photos show, the flooding is quite severe, and much of the proposed site is under water. This happens regularly, this is not a one-off occurrence. The Environment Agency defines a high-risk flood zone as one where there is a 1 in 100 chance of flooding in any given year. This field floods far more often than that. I've attached a screen shot taken directly from the Environment Agency website, which shows the extent of flooding from surface water across the site. The photos show that this site (LP0177) is a perfect example of a flood plain at work; soaking up excess water at times of heavy rainfall, allowing space for the water to flow and be stored in times of flood, even after the river has burst its bank, and protecting land further downstream from potential flooding. The DEFRA 25 year plan states: "National flood management involves the use of a variety of measures, including tree planting, river bank restoration, building small scale woody dams, reconnecting rivers with their flood plains, and storing water temporarily on open land." Developing this floodplain area would be in direct opposition to National flood management. The exceptional floods of Boxing Day 2015 led to much damage further downstream, and eventually to the collapse of Elland Bridge. The repair bill for the bridge alone came in at £4 million, while the total economic impact to the Calderdale and Kirklees regional economy amounted to a total of approximately £170 million. (Economic Impact Assessment of the Boxing Day Floods (2015) on SMEs in the Borough of Calderdale) If the proposed scale of development along Saddleworth Road is allowed to go ahead, and these valuable flood plains are built over, then the events of 2015 will become a much more regular occurrence, leading to untold costs to the communities of West Vale, Greetland, Elland, and even further downstream. The current policy and legislation on flooding states - "due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere. And Chapter 14, paragraph 163 of the NPPF states: - "When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere" It is clearly the case that any future development of the site LP0177 would itself be under serious threat of severe and repeated flooding, and it would also put

neighbouring communities in much greater danger of flooding. I believe this is a strong enough argument on its own to remove this site from the Calderdale Local Plan.

2. Loss of large area of Green Belt and Wildlife Corridor

Protecting or Wildlife Corridor and Green Belt is very important to me. Esther McVey, our current Housing Minister agreed, when she wrote in her policy on Green Belt land: "protecting the Green Belt goes beyond protection against development"

Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: (i) to check the unrestricted sprawl of large built-up areas (ii) to prevent neighbouring towns merging into one another (iii) to assist in safeguarding the countryside from encroachment (iv) to preserve the setting and special character of historic towns (v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The site LP0177 as it currently exists as a Greenfield site performs strongly with this criteria. Development of this site seems to fly in the face of the NPPF information. DEFRA (Department for Environment, Food & Rural Affairs) says in their 25 year plan: "New development will happen in the right places, delivering maximum economic benefit, while taking into account the need to avoid environmental damage. We will protect ancient woodlands and grasslands, high flood risk areas and our best agricultural land." Developing site LP0177 also contradicts this. Having lived adjacent to the site for 18 years, I regularly see Herons flying past. Tawny owls and deer are regular visitors, as are bats, foxes and hedgehogs, and I have seen badgers also. The Black Brook is home to Brown Trout. We must do everything we can to protect the wildlife in this Wilderness Corridor. The DEFRA 25 year plan also states their aim to: "Develop a Nature Recovery Network to protect and restore wildlife, and provide opportunities to re-introduce species that we have lost from our countryside" Developing this site with 200 homes would destroy this precious Eco-system. "Having access to green spaces can reduce health inequalities, improve well-being, and aid in treatment of mental illness" says the World Health Organisation. We need to be protecting this space, not developing it.

3. Current Chronic Congestion in West Vale, Greetland and the effect on Air Quality

The traffic lights in West Vale, at the junction of Saddleworth and Stainland Roads are a joke. Allowing the Co-op food store to be built right on the junction caused a bad situation to be made much worse. Huge queues extend back up Saddleworth Road (and Rochdale Road) in both directions, as well as up Stainland road every morning, and again each evening. There is simply too much traffic now for this junction to work. Add in an accident on the M62, and suddenly things get far worse again. Major plans may be in place to improve the A629 into Halifax, but these plans will do nothing to alleviate congestion through West Vale and Greetland. If the proposed developments are allowed to go ahead along Saddleworth Road, the congestion will be made much worse yet again. In fact, the WSP Parsons Brinckerhoff Report on Transport Network states that the traffic congestion at the juncture of Stainland Road-Saddleworth Road would increase by approximately 105%. So a traffic junction that is not fit for purpose, and is the bane of my life every morning and evening, (and for every other resident of Greetland, West Vale, Stainland, Elland, Barkisland, and surrounding area that needs to get through this junction every day) is going to be made 105% worse. The proposed development cannot be allowed to go ahead on this site. The effect on Air Quality that all this congestion causes is undeniable. Young children walking to school each day face walking for hundreds of yards past long queues of idling traffic waiting to get through West Vale traffic lights. Greetland Academy actually sits right on Saddleworth Road, as does Sunnybank Pre-school, often with queuing traffic right past the site. West Vale Primary School is right on Stainland Road, surrounded by queues of idling traffic. There are seven existing large companies in the immediate area with Lorries that rely on the motorway, many of which travel up and down Saddleworth road each day, adding to the congestion and the pollution. Air pollution is the biggest environmental threat to health in the UK, with between 28,000 and 36,000 deaths a year attributed to long-term exposure. There is strong evidence that air pollution causes the development of coronary heart disease, stroke, respiratory disease and lung cancer, and exacerbates asthma. This information comes from Public Health England (PHE) in a report from 11 March 2019, in which Professor Paul Cosford, Director of Health Protection and Medical Director at PHE, said: "Now is our opportunity to create a clean air generation of children, by implementing interventions in a coordinated way. By making new developments clean by design we can create a better environment for everyone, especially our children. Key interventions local authorities can take include: redesigning cities so people aren't so close to

highly polluting roads." The proposed development plans along Saddleworth Road are in complete contrast to these Public Health England recommendations. They want to build new communities directly on already highly polluted and congested roads, increasing the threat to all of us. We cannot let these plans go ahead. 4. Lack of Infrastructure Local Schools are full - both Greetland Academy and West Vale primary schools, as well as the secondary school, Brooksbank in Elland. With a proposed 600 houses, using Calderdale MBC's figure for school places of .36 per household (IDP section 9.14) this indicates another 206 places would be needed. And long term residents of Greetland would suddenly see themselves pushed out of the catchment area of their own local school, at the expense of 600 new homes built on Green Belt land surrounding the existing school. Local Dentist has a waiting list of 600 for NHS places. The nearest NHS dentist was recently found (July 2019) 11 miles away in Kirklees. The GP Surgery would be strained to take this proposed capacity. There would also be a further strain on local Hospitals. The proposed plans make no provision for extra school places, let alone Doctors and Dentists. The infrastructure needed to accommodate the size of the proposed development simply does not exist, so the proposed development must not be allowed to proceed. -----

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

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

Duty to Co-operate Reason:

see reasons above.

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5594683> ; <http://calderdale-consult.objective.co.uk/file/5594682> ; <http://calderdale-consult.objective.co.uk/file/5634629>

Comment ID **HRU1300**

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:

The proposal does not adhere to the guidelines in the NPFF with regards to use of Brown Field sites. There seems to be no reason to remove this from the Green Belt. The area is a flood plain for the Black Brook which the plan suggests can be mitigated, however any reduction in the ability of the water to be spread onto the flood plain will push the problem downstream which already has flooding problems this will be

exacerbated. The local infrastructure can not absorb the extra housing, The local school is full as are the Doctor Practices. The site has only one route which is via Saddleworth road which passes through West Vale traffic lights. This is very congested and at peak times the can be up to a quarter of a mile of stationary traffic. This proposed release for housing will increase this substantial and stationary traffic will back up to the Primary School polluting the air next to the playground of the school. The loss of green belt is nor acceptable it is an area which forms part of a green corridor rich in wildlife and used by walkers, dog walker, ornithologist and botanists. It is frequented by Herons, 2 species of woodpecker, Kestrel, Buzzard and a great variety of other birds.

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

Sound Reason:

It does not follow national policy

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

Duty to Co-operate Reason:

The plan was not well publicised with most people finding out about it late by word of mouth.

Suggested Modifications:

This site should remain as Green belt as there is no reason to remove this status as brown field sites are readily available in Calderdale and have not been exploited.

Comments:

Additional Evidence Link:

Comment ID **HRU1304**

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

Person ID: **1243963** Name: **Mr Andrew Tweedale** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

Please find the attached document titled "LP0177 Main Points of Objection"

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

Sound Reason:

Please find the attached document titled "LP0177 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 "LP0177 Main Points of Objection"

Suggested Modifications:

n/a

Comments:Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609761>Comment ID **HRU1309**Site ref (if applicable): **LP0177**Person ID: **1242757**Name: **Miss C Davenport**

Organisation:

Agent ID:

Name:

Organisation:

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

The current housing minister, Esther Mcvay, has stated the below in her policy on Green Belt: "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" The land at the proposed site LP0177 meets all the 5 Green Belt tests so therefore should be protected as there do not seem to be any - "exceptional circumstances" that would warrant it being developed on. There has also been £2 million pounds worth of funding allocated for councils to employ Enforcement Officers to prevent this kind of malpractice from happening and Calderdale Council is one of the councils that have received this funding to the sum of £50,000, in which case this land shouldn't even have been put forward as a possible site as the Enforcement Officer should have made Calderdale Council adhere to the Green Belt policy. 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" The rainfall on 26 th December 2015 and more recently on 8 th February 2020 saw the fields at site LP0177 Saddleworth Road, Greetland suffer severe flooding. Any building on this land would cause more flood water to run further down the Valley to Lower Greetland and West Vale which means that Calderdale Council is not complying with the current policy and legislation as quoted above. On the local plan the land at site LP0177 has been classified as Green Field, however this is a misrepresentation as the land is actually classified in the Calderdale Council Green Belt Review ; Final Report 2017, as a - "most sensitive green belt parcel" The details of the report can be found at the following URL: https://www.calderdale.gov.uk/v2/sites/default/files/Planning-local-plan-green-belt-elland-stainland-greetland_2017.pdf On the local plan the village of Greetland has been bundled in with the town of Elland - this is misrepresentation as Elland is a much larger area than Greetland and is also a HX5 postcode as opposed to the HX4 postcode of Greetland. This is an attempt to hide the large volume of building in a 1/2 mile area of a small village, which is completely disproportionate to the proposed development sites in Elland. Finally, as a resident of Greetland I have not received any form of contact from the council regarding the considered development sites. In Calderdale Council's Statement of Community Involvement, it states in table 6.1 that there will be - "Notification by letter or email to consultees/stakeholders as stipulated in PPS12 and shown in sections 10, 11 and 12" Section 12.1 states - "The following list sets out additional individuals; bodies and organisations that will be consulted or invited to be involved in the course of the preparation of LDDs. These are not specifically referred to in the Town and Country Planning (Local Development) (England) Regulations 2004, or in Government Guidance. Calderdale Councillors; Members of Parliament for Halifax and /or Calder Valley as relevant; Interested

Parties:- landowners, developers, agents, local residents, community groups, and others who have requested to be kept informed of the progress on the Local Development Framework or have specific interests in an LDD under preparation."Therefore as a local resident I should have received notification by letter or email, especially as I live opposite site LP0177 and will be directly affected by it.

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

Sound Reason:

The traffic in Greetland, particularly on Saddleworth Road, is already very heavy busy and the junction with Stainland Road at West Vale regularly has queues of traffic nearly half a mile long. The addition of so many more cars and journeys would strain this further and worsen traffic conditions. The plan to build 200 houses on site LP0177 would mean that based on an average 2 cars per household there will be 400 extra cars using this road in particular. The current infrastructure will be unable to support this and it will affect local residents massively due to the increase in noise and air pollution, as Calderdale Council has adopted the Clean Air Policy 2018 I believe that allowing this development to go ahead would contravene this policy. The local schools and medical practices are not in a position to take in more students and patients, which means that more building will have to be done on potentially more Green Belt sites to accommodate the need for these extra school and patient places. Once we have lost the Green Belt it is gone forever. The damage caused by developing it can never be reversed. I regularly use the public footpaths that cross not just this site but the other Saddleworth Road sites and see lots of species of wildlife that have been on this land for generations. To take away their habitat, especially when some of these species are rare and there are other brownfield sites available to develop which wouldn't damage the ecology of this area, does not seem right, and shows no evidence that there is an exceptional need to warrant changing this land from being a Green Belt area. If anything it is evidence of why this area should remain Green Belt. The valley that Greetland sits in is prone to flooding, and the increase in intensity and frequency of storms that we have been seeing in recent times means that we need flood plains to stay as flood plains in order to avoid even more damage being caused to local residents than there already is. The site of LP0177 is classified as a Flood Zone 3a, which by definition is a high risk area. To build on this flood zone will cause areas lower down the valley, such as West Vale, to experience an increase in the flooding that they already have to deal with. This will affect not only residential properties but also sports clubs, and numerous local businesses. Therefore rather than the local economy benefitting from the proposed developments it is likely to suffer as a result of it.

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

Duty to Co-operate Reason:

The duty to cooperate states that councils and public bodies should -"engage constructively, actively and on an ongoing basis"to develop strategic policies which result in sound local plans, I am unable to find any evidence that Calderdale Council has engaged with the Highways Authority to develop a strategy for dealing with the large volume of extra traffic that will be created by development on site LP0177.

Suggested Modifications:

Take site LP0177 off the current plan and redevelop an existing brownfield site instead such as the former Horsfalls Mill in West Vale which is close to public transport and amenities and therefore won't exacerbate the current traffic and pollution issues as much; as well as already having been built on so it is therefore unlikely to adversely affect the current flooding issues that occur.

Comments:

Additional Evidence Link:

Comment ID **HRU1312**

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

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 "LP0177 Main Points of Objection"

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

Sound Reason:

Please find the attached document titled "LP0177 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 "LP0177 Main Points of Objection"

Suggested Modifications:

N/A

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609767>

Comment ID **HRU1313**

Site ref (if applicable):

Person ID: **1243900**

Name: **Mr Jacob Travis**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The Local Plan does not address the NPPF particularly paragraph 177 and the associated PPG in the Sustainability of Greenbelt Sites. According to NPPF Para 143 it states 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' There are no VERY special circumstances for this site.

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

Sound Reason:

GREEN BELT This plot is in highly sensitive Green Belt and fulfills multiple criteria for Green Belt. It is necessary because it creates a barrier for the countryside and loss of this is likely to lead to further building

along the valley creating urban sprawl to Barkisland. Calderdale stated the Local Plan will only use 2% of the Green Belt but the proposed development in Greetland are 38% of our Green Belt which is ridiculously disproportionate. A recent report has not been made on available brown field sites, I believe the last one was in 2018, so I do not think they have exhausted these opportunities before looking at Green Belt land. In a recent meeting the Counsellor said it's difficult to get developers to use Brown Field sites 'because it was too messy' and developers prefer green field because it's easier and cheaper. These are not VERY exceptional circumstances. . URBAN SPRAWL / DISPROPORTIONATE The 2017 Calderdale Review identified LP0026 as having a 'high potential for unrestricted sprawl'. It is important we prevent Urban Sprawl as it separates our Green Belt from urban development and safeguarding the countryside from encroachment. As mentioned above the proposed developments will take away 38% of Greetland's green belt. Without this protection I am sure that 38% will increase over the year. Calderdale Council has declared a "Climate Emergency" and our green belt is a vital tool in the fight against climate change. Allowing the removal of green belt land is in direct contradiction to existing policies around climate change. Also looking at the inclusion of Elland, Greetland, West Vale and Stainland as one in the plan shows how this urban sprawl has already happened. Firstly I feel they should not be grouped together. Greetland is a village in it's own right and the assignment of this many houses to Greetland, not Elland and not Stainland and not West Vale is completely disproportionate and the council should consider adding housing to the plan for other areas. Building an additional 600 houses in Greetland is nearly a 50% increase to the number of houses here.

FLOODING THESE FIELDS FLOOD. They also act in absorbing much of the water that if developed on will merely flow down the hill and worsen the flooding in the valley bottom we have just seen. 2015 and 2020 have seen horrendous floods which is costing the council millions of pounds to sort out. Allowing development on this site will only worsen the problem, cause further flooding and increase the amount the council is going to have to spend on flood damages in the future years. Also the impact on flooded communities is horrendous, homes are wrecked, livelihoods destroyed and all this development will worsen the problem.

TRAFFIC CONGESTION / HIGHWAYS Greetland already suffers congestion problems and the traffic outside the school in particular is horrendous. There are local plans in place to reduce traffic in Sowerby Bridge by diverting traffic from Ripponden to Greetland along Rochdale and Saddleworth road before the addition all this proposed housing. This will lead to extremely unsafe roads, more potholes on our roads that are already in disrepair and increased travel times for local residents. This will also bring with it high levels of air pollution again contradicting the councils Climate Emergency policies. Small lanes such as Scar Bottom Lane simply can't cope with increased volumes of traffic. These are small country roads that are difficult for multiple cars to negotiate at the best of times.

WILDLIFE There is a huge amount of wildlife residing in the field around Greetland including bats, foxes, deer, newts, and badgers to name but a few. If we build on this land this habitat is lost forever.

ENVIRONMENTAL HEALTH / NOISE / AIR POLLUTION Calderdale council has declared a Climate Emergency yet we are hear discussing the removal of green belt land which will further add to this. I believe there is a minimum air quality level that we should not be breaching but this is not a target to work towards, it is a minimum level. The new buildings and traffic congestion will severely impact the air quality around Greetland reducing the quality significantly. The increased number of cars on the road and work ongoing will have a significant impact on local residents.

INFRASTRUCUTURE The local infrastructure in Greetland can't cope with the additional housing developments. My wife is pregnant and recent went to see her midwife who ordered a blood test be carried out, this needed to be done in the next 2 weeks. There were no appointments at the local surgery in West Vale for 5 weeks so she had to go the hospital in Halifax. The school in Greetland is also not able to cope with the increased number of students that these extensive developments will bring. Parents or children can't be expected to be travelling miles and miles to get their children to school. I don't see any plans from the council to develop the infrastructure further and if they do I presume they will have to build on Green Belt land again which will again be showing urban sprawl and further loss of the green belt in Greetland.

PLAN NOT RELEVANT I would suggest this plan should be revised following the outcome of BREXIT. The need for housing was built around an economic forecast for growth which is no longer relevant. Previous economic growth targets tied in to the number of new houses needed have not been

met and there is nothing to suggest that future levels will meet the forecasts. Therefore proposed housing levels and not accurate, the plan is not relevant and should be revised. I recently moved house within the Greetland area (Rochdale Road to Saddleworth Road) and did not find it difficult to find suitable housing in the area.

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

Duty to Co-operate Reason:

There has been no effort from the local council to inform or engage with the local community on this issue

Suggested Modifications:

Site should be withdrawn from the local plan

Comments:

Additional Evidence Link:

Comment ID **HRU1319**

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

Person ID: **959163**

Name: **Mr Richard Brady**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The method by which LP0177 and all the other sites in Greetland were reintroduced into the local plan is legally flawed in my opinion for two reasons: 1) I would have expected all the previously allocated sites for housing which were not included in the first version of the plan be given equal consideration when further sites were required for inclusion, I would need to be convinced this actually occurred, we have been informed by a local councillor of very short notice being given of a planning meeting at which the decision was made to include LP0177. 2) The process of choosing LP0177 has been impacted by the fact that a developer is already on board. The council stands to quickly receive Â£1.3m of central government funding if they were to grant planning permission for the proposed scheme for LP0177. This is clearly stated in the housing brochure published on behalf of David Wilson Homes on 10/01/20 for the development of LP0177. For those who have not seen this document here is the link, the "bonus payment" of Â£1.3m is mentioned on page 5 <https://fliphtml5.com/bhsxf/jxwt/basic> Although the financial inducement for developing LP0177 is entirely legal it makes the site more attractive than an otherwise better one which has no developer on board, it is therefore distortive of the planning process making the plan potentially not legally compliant.

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

Sound Reason:

NPPF Para 143 under '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.' We do not believe these special circumstances exist for LP0177 and all other proposed sites in Greetland therefore the plan is unsound. Building on green belt is a once only event, it can't be reversed, the ecological damage including the loss of the wildlife corridor at LP0177 and deterioration of air quality must

be taken into account in the plan. FLOODING -Approximately 40% of LP0177 is the field which runs the length of the site alongside Black Brook and serves a floodplain, it flooded badly again earlier this month, a man was seen paddling a canoe on it. The brochure for the housing development on LP0177 already published on behalf of David Wilson Homes includes a comment that "no new homes will be delivered on areas of identified flood risk". Their map of the site shows homes and an access road on the floodplain field south of the Greetland Academy playing field, so the flooded field WILL be built on if planning permission for this scheme is granted. The access road must come very close to the 10 metre exclusion zone mentioned in the site specific considerations. The building on floodplains is not consistent with CMBC's recently declared "Climate Emergency". The David Wilson Homes proposal for LP0177 is remarkably dense with access roads, I am surprised it is still permitted to develop in such a "car focused" environmentally damaging way. The flood risk is increasing throughout Calderdale one reason for which is rainfall run-off on built areas. Everything coming off this new estate would be straight into Black Brook and contributing to flooding further down the valley, all the fields in LP0177 currently perform an important role in holding water back from the run off from earlier developments higher up the hillside. INFRASTRUCTURE proposals have not been included, it is not good enough to say these will follow, David Wilson Homes have not mentioned anything specific in their brochure to build 200+ houses on LP0177. Infrastructure issues include - Schools - full Public Transport - (David Wilson Homes have the cheek to mention the laughable, unreliable, hourly 343 bus service, not sure what the new residents are supposed to do on a Sunday or in the evening, they'll wait a long time at the bus stop before getting their car out like the rest of us). Roads - West Vale lights are already over maximum capacity and are one of the major bottlenecks in Calderdale. Doctors/Dentists - waiting lists Sequencing - There is nothing in the plan which ensures brownfield and any green belt are developed in parallel. It is therefore likely that all the easy, profitable green belt sites such as LP0177 get developed and we turn round to see relatively little on the more complex brownfield sites available. During the period of the plan the house-building targets may well reduce (one stated aim of Brexit is to reduce immigration and anecdotal evidence suggests EU nationals are packing up and finding somewhere better to work & build their lives). The plan does not consider this scenario as it was developed pre-Brexit and building on overwhelmingly green belt sites such as LP0177 therefore is not sound.

LOCATION - LP0177 and all the other sites in Greetland, Elland & Brighouse are attractive to commuters outside the borough, many residents work outside Calderdale and the new homes will be attractive to incomers who will continue to work in Leeds and Manchester and at locations along the M62 corridor. We will be a cheap housing option to these incomers and little by way of economic development in Calderdale will accrue. The plan is not sound as a disproportionate amount of development is in the south of the borough. The inspector's requirement for additional new housing above and beyond the original plan submitted by Calderdale MBC WHICH DID NOT INCLUDE LP0177 needs to be re-assessed in the context of the new economic circumstances post Brexit. Other councils have gone back to the Secretary of State and contested the amount of extra new housing required, as an example see the link regarding Wrexham Council who have rejected the requirement of an increase of over 3,000 houses demanded by the government which they consider flawed. <https://www.bbc.co.uk/news/uk-wales-51361879>

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

Duty to Co-operate Reason:

I would have expected all the previously allocated sites for housing including LP0177 which were not included in the first version of the plan be given equal consideration, I would need to be convinced this actually occurred, we have been informed by a local councillor that she was given very short notice of a planning meeting at which the decision was made, this conflicts with a duty to cooperate.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1325**

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

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 LP0177 along with LP0952, LP0026 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 **HRU1326**

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

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 LP0177 along with LP0952, LP0026 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 **HRU1340**

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

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 council has not cooperated with neighbouring councils such as Bradford and Rochdale. The consultation portal is difficult to use and confusing it places Greetland sites under the 'Elland' tab.

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

Sound Reason:

The plan has not been positively prepared . These new site allocations are a 'knee jerk' reaction to the comments of the planning inspector. Using greenbelt land is not justified and does not effectively use the land that Calderdale has. These new site allocations are entirely inconsistent with national policy. Economic Need We are told that we need this housing because Calderdale projects significant economic growth over the next 15 years. Calderdale commissioned a report from Turley called 'Modelling the Economic Implications of the Proposed Housing Requirement' to support its projections. The housing need in the report is unrealistically based on Calderdale experiencing net migration which is above the historical average. It is a fact that net migration is falling post the Brexit referendum (see www.migrationwatchuk.org/statistics-net-migration-statistics) and the Government is altering (tightening) the immigration rules. It is a fact that EU free movement of people will stop in December 2020. Low skilled migrants will be refused visas (see BBC News Website 'no visas for low skilled workers, government says' 19/02/2020) 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. Turley's 2014 dataset is outdated and unreliable. Flooding This site floods. Part of it is a flood plain, it is not suitable for housing. See the attached photograph. It was most recently flooded when Storm Ciara hit the Calder Valley in February 2020. This storm devastated Mytholmroyd even though the Environment Agency has spent c£40M on flood defences and mitigation schemes there. Calderdale Council has declared a climate emergency but are promoting the release of Green Belt active flood land for housing. The flood risk cannot

be mitigated against. West Vale, Elland and Brighouse will flood if this land is built on. This policy contravenes NPPF para 163. In addition the 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. The Black Brook flows into the River Calder. The River Calder regularly bursts its banks already. Building on this site will increase the regularity and severity of flooding. impermeable and all the rainfall that hits the site will turn into surface run off and the local rivers will reach and breach capacity more quickly. Lord Shutt a Lib Dem Life Peer who lives alongside LP0177 is quoted on Hansard as witnessing this site regularly, flood the last time being in Feb 2020. Sustainability Appraisal for site LP0177 These contain too many objectives where 'uncertain' outcomes have been established. The council simply does not know what the impact of building on this land will be. The plan is not sustainable. Infrastructure The roads are at gridlock as it is. West Vale, Barkisland, Stainland and Ripponden are all bottlenecks for traffic. There are not enough school places for the proposed households. Green Belt The NPPF chapter 13 has been ignored by the council. Building on Green Belt should be the last resort. There are lots of Brownfield sites that could be used for new housing in Calderdale. Dwelling densities could be increased on other sites e.g. Brighouse see NPPF paras 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/infrastructure 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. use of this site would make Greetland Academy an enclave in a sea of concrete, the children would suffer increased air pollution levels.

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

Duty to Co-operate Reason:

The council has not cooperated with other councils.

Suggested Modifications:

Remove sites LP0177, LP0952, LP0026 & LP1625 from the plan. Look at and survey brownfield sites. Shelve the flawed and outdated economic projections and start afresh with them. increase housing densities in Brighouse allocations.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609771>

Comment ID **HRU1343**

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

Person ID: **1130385**

Name: **Mr George Thomas Clayton**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The Council's Sustainability Appraisal process to support the release of the site is inadequate. The site

report states that the assessment of SA7 is 'Negative' and marked 'RED' commenting that "Overall the impact is negative as the site is greenfield and lies within flood zones 2 and 3". The site should be excluded ('Filtered' in Council terminology) on this conclusion alone, particularly within the wider context of the Council's recent declaration of a Climate Emergency and recent flood events. Further, the report does not grapple with the issue in the overall conclusions inadequately noting that "with regards to SA7 and flood risk, the impact is negative as the site is greenfield and lies within flood zones 2 and 3" with no specific mitigation measures identified. This does not come anywhere close to an adequate assessment to justify release for development. The Council have proposed a number of alterations to its Green Belt boundaries to simply meet an inflated housing target at the cost of great environmental harm. The NPPF is clear that Green Belt should only be altered in exceptional circumstances through the preparation or review of a Local Plan. Where it is necessary to consider revision of the Green Belt, this review should be robust in its justification for any alteration ; which is critically missing. The critical importance of early and meaningful engagement and collaboration with communities in producing Local Plans, particularly where this involves altering Green Belt boundaries has not been undertaken as the site has been parachuted into the plan-making process during hearing sessions. This constitutes a serious breach of procedural compliance. A local pressure group has been set up at the last moment to attempt to deal with these issues locally and has attracted a significant amount of support. However, the community has not been given the opportunity to produce a Neighbourhood Plan. Neighbourhood Plans can be used by local people to positively shape development in their area, including establishing principles for how former Green Belt sites are developed.

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

Sound Reason:

National policy is clear that Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan. The Calderdale Local Plan, which has suffered from a democratic deficit throughout its many iterations, sets a target for housing based on pre-Brexit demographic evidence of Objectively Assessed Need (OAN). This means that the Green Belt as designated in the current UDP has had to be reviewed. The OAN is far too great and as it relates to out-of-date population projections used in Strategic Housing Market Assessment (and update) that have been superseded by lower projections in more recent Office of National Statistics releases that would result in a much lower housing target and the reduce the need to release the number of Green Belt sites. Further, the ambitions of the Council for annual jobs growth over a 16 year period characteristic of a constant 'boom' inflate the requirement well beyond the realistic possibility of actual delivery. The NPPF sets out the aim of Green Belt policy which is -“to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”-The NPPF explains that the Green Belt serves five purposes: (i) to check the unrestricted sprawl of large built-up areas (ii) to prevent neighbouring towns merging into one another (iii) to assist in safeguarding the countryside from encroachment (iv) to preserve the setting and special character of historic towns (v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The Council, in its own evidence, concludes that the overall parcel within which the site is located performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt but, most decisively, would see the coalescence of Greetland and West Vale and the deterioration of the identity of both places. This critically undermines the Council's Settlement Hierarchy. The most recent revisions to the Local Plan in response to the Inspector's letter include the addition of more Green Belt sites (including LP0177) for release, which represents further unsustainable development as a disproportionate amount of the new homes proposed are across just four sites in Greetland. Indeed, 1,041 additional units of the 1,708 on these new housing sites (over 60%) are proposed in the Elland area alone. There has been substantial development of land in both Greetland and Elland in recent years. This

cumulative development means that the land at Ellistones Place is the only remaining parcel of the original Green Belt still in agricultural use. Development of the site would erode the visitor's understanding of the extent of the original manorial lands that Greetland covers. It is notable that the site was significantly waterlogged by storms in February 2020 alongside many others in the Calder Valley. The district is characterised by a very particular set of topographical constraints that are not replicated anywhere else in the UK, five towns are located in the valley bottom of the South Pennines. It is simply not sensible to allocate land, including a significant amount of Green Belt release, to meet inflated housing targets based on out-of-date household projections and ambitious and continual jobs growth. The housing target needs revisiting to model scenarios reflective of evidenced-based jobs growth (rather than ambitions), up-to-date household projections (including post-Brexit population projections) and the priority to contribute to sustainable development that does not harm the environment (including the Council's Climate Emergency commitments). In short, the Local Plan has been overtaken by events both demographically, economically and environmentally. At this point, the Council is proposing to adopt a Local Plan that runs entirely against the corporate ambitions of the authority. It is simply the case that no plan at all (and reliance on the NPPF & NNPG to direct new developments, which would include the protection of sensitive Green Belt) would be better than the proposed Local Plan that is under examination. The Sustainability Appraisal for the Local Plan has not been mapped or measured. The benefits of, or the opportunities for, the provision of ecosystem services by the Green Belt land directly around the urban environment are unrecorded. Section 39 of the Planning and Compulsory Purchase Act 2004 states that a local authority exercising their plan-making functions must do so with the objective of contributing to the achievement of sustainable development. Action 5 of the EU Biodiversity Strategy to 2020 requires member states to map and assess ecosystems, whilst the Minister of State for the Environment reiterates the necessity to map and value the natural capital that make up ecosystem services, specifically in urban environments, in order to improve sustainable planning. Further, the NPPF sets out a presumption in favour of sustainable development and advises that the planning system should contribute to and enhance the natural and local environment by a number of measures that include 'recognising the wider benefits of ecosystems services'. The issues on the site flagged by the Council itself, particularly regarding traffic impacts and flooding serves to underscore that the proposals are not sustainable in NPPF terms. When the harm identified is taken into account the proposals do not amount to sustainable development. The site is unsuitable for development in accordance with national policy set out in the NPPF relating to Green Belt and Heritage Assets and recent planning case law determined by High Court Judgements relating to the siting of Listed Buildings. The proposals are not supported by Housing Infrastructure Fund (HIF) from Homes England and the inadequacy of existing infrastructure to accommodate this level of growth confirms that the proposals are unsustainable. This is outwardly recognised by the local Member of Parliament, Craig Whitaker MP, who would be expected to raise infrastructure concerns with the Secretary of State with regard to the proposed release of green belt, particularly in Greetland particularly given the lack of HIF. The Secretary of State has the power to issue a holding direction to prevent any further action in relation to the submitted local plan, including withdrawal of the plan, whilst he considers use of his intervention powers under section 21 of the Planning and Compulsory Purchase Act 2004 (-"the 2004 Act"). The function of the planning system is to facilitate sustainable development that makes a positive contribution to the environment. It is not the role of the Council to recklessly release demonstrably unacceptable sites within the Green Belt to meet a housing target. The Inspector's letter of 16 July 2019 to the Council notes (Para. 14) that "Local Plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits". This is the undoubtedly the case here. No sensible phasing options are proposed related to release of the most sensitive Green Belt sites upon the requirement to demonstrate a five year housing land supply even if the release could be justified. It is illogical to allocate Green Belt sites in Flood Risk Zones 2 and 3 for development before brownfield sites are fully exhausted. The immediate release of the site for development is simply not a sensitive approach to the release of Green Belt land even if it were to be appropriate. Later, the Inspector asked the Council to review the option of 'the supply of more suitable and available sites elsewhere' understanding this to be an option,

however, the further work on the additional sites considered (incorrectly by the Council) to be 'suitable and available' are not, in fact, suitable and, in any case, it has been revealed that this option on the site at land adjacent Ellistones Place is simply not sustainable and the proposal is unsound.

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

Duty to Co-operate Reason:

Not in a position to comment - unaware of this.

Suggested Modifications:

The Local Plan proposals to release Land adjacent Ellistones Place (Ref: LP0177) and site requirements relating to the release of the land from Green Belt ARE not positively prepared, justified, effective or consistent with National Planning Policy Framework (NPPF) and accompanying Guidance (NPPG). The principal objections to the development of the site I have outlined are (but are not limited to): Out-of-date justification of housing requirement for Green Belt release Disproportionate amount of planned development. Adequacy of the sustainability appraisal. Implications of flood risk. Procedural and legal compliance issues. Lack of supporting infrastructure and funding. Demonstration of sustainable development. Given the distinct lack of soundness and legal compliance, the only modification I consider necessary is to remove the site from the Local Plan.

Comments:

Additional Evidence Link:

Comment ID **HRU1355**

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

Person ID: **1243840**

Name: **Mr James O'Hara**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The consultation process has not been publicised enough.

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

Sound Reason:

The plan flies in the face of the NPPF: Flooding This site floods , it is an active flood plain and was under some feet of water following the heavy rainfall from Storm Ciara in February 2020. See the attached photograph. The site as a whole site soaks up rainfall and slows down the transit of water to the nearby Black Brook (river). The council has not adhered to NPPF 155 or NPPF 163 when including this site in the Local Plan. Building on this site will cause West Vale, Elland and Brighouse to flood and quickly. 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. Nature will not be tamed. This land is not suitable for development. The DEFRA secretary, George Eustice MP, said on BBC Radio 5L on 17/02/2020 at 08:07 ' We do have to think about how we manage water catchments upstream and that's why we're committing 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 surrounds and protects our local school. 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. 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. Sustainability The sustainability appraisal for this site contains too many 'uncertain' outcomes. Basically the council doesn't know what the impact of building on this land will be but are prepared to allow building to occur nonetheless. this is unsustainable. 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.

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

Duty to Co-operate Reason:

The council has not adequately consulted with its neighbouring councils.

Suggested Modifications:

Remove LP0026, LP0952, LP0177 & LP1625 from the Local Plan. looks at the economic assumptions which have been put in place, they are flawed. Increase housing densities in Brighouse.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609711>

Comment ID **HRU1371**

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

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 LP0177 along with LP1625, LP0026 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_lq263NGHjCx4_m66ibHv8vaQ How can it be justified to be building on this sensitive land that provides a home to so much wildlife, prevents and protects local areas from flooding and also provides us with a public right of way? Many people use this land for leisure purposes to get out into nature and walk. Building here will take away this opportunity for many and therefore have a direct impact on the communities physical and mental health. The plans outline for a number of homes (approx.. 600 over the 4 mentioned sites) to be built on this land. We are a relatively small village as we stand and the prospect of adding these kind of numbers will cripple our already struggling services. Where are these people going to register for doctors' appointments? NHS Dental appointments? Many in the local area already struggle with waiting times for these services and this plan will lead to this worsening. With people being unable to get these doctors appointments this will lead directly to increased hospital admissions putting a strain on the NHS. The local roads in the area already struggle with the amount of traffic going through the village and ending up at a standstill in Westvale. These plans will put a further 600+ cars on our roads. These roads will not physically cope with that much traffic. It will also lead to long delays coming and going from the area which will see the air pollution rise especially around our local schools leading to further health issues for our communities' residents. The school pick/drop off time at the school on Saddleworth road is already chaotic at the best of times, how are we going to deal with even more people needing to be there at the same time? On a number of recent occasions, the local area has seen frequent flash flooding. These sites work as a natural flood defence for our area and also help to prevent flooding to areas down stream of us. The last few years have shown us that these incidents are occurring more and more often, do we really want to build on land that is naturally doing it's job to protect us? Throughout Calderdale a number of areas such as Sowerby Bridge and Hebden Bridge are currently having the spend millions on the clean up from floods and trying to fund prevention for future flooding. With that in mind, why would we want to add further problems to the area when we are already struggling? I can appreciate the need for some development to areas where more housing is required, but this amount of new homes in a small village like ours can not be justified. It will change the entire landscape of the village and have a direct negative impact on the quality of life for many.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1372**

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

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 site sustainability reports are not fit for purpose. They are inconsistent when read alongside one another.

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 3 are marked Green, 4 are Red and 9 are yellow. The report has not been prepared properly and is misleading for example Objective 8: TO REDUCE THE EFFECT OF TRAFFIC ON THE ENVIRONMENT is marked as 'uncertain' yet the land the green belt and away from economic centres. every resident who lives in one of the proposed dwellings will have a car. This will negative impact traffic and 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 increase the frequency and severity of flooding at this site and will also increase flooding elsewhere and in particular in West Vale, Elland and Brighouse. This is against the NPPF paras 155 & 163. The Calder Valley is at a unique risk of flooding (as said by the Environment Agency), this is recognised by government and there have been significant floods within the last 8 years, the most recent being as a result of storms Ciara and Dennis in February 2020. The risk cannot be mitigated. Tens of millions of pounds have been spent in the Upper Calder Valley and still Hebden Bridge, Mytholmroyd and Sowerby Bridge experience regular devastating flooding. The Black Brook flows at the bottom of this site and feeds into the River Calder. To build on this site would be to knowingly increase the regularity of floods in West Vale, Elland, Brighouse and beyond. There would be: * Increased surface water runoff * Reduced peak rainfall/peak flow lag times * Loss of natural water storage * Loss of flood plains *Increased transit speeds of rainfall *Increased peak flow volumes * More frequent flooding

Lord Shutt lives next door to this site (LP0177), he told the House of Lords in Feb 2020: My Lords, I declare the interest that I live in Greetland in the Blackburn Valley, less than a mile from the confluence with the Calder Valley. I saw the floods yesterday; I saw the Black Brook rise and come over its banks, and I saw it flood into several fields in front of my house from my own front window. I saw the same thing on Boxing Day in 2015. I am well aware of how those floods seriously affected Sowerby Bridge, Mytholmroyd, Hebden Bridge and Todmorden, and that has happened again this time. A mere 38 years ago, when I happened to be mayor, I had to visit various people, while wearing my chain, who had been flooded, so it is nothing new that we have floods in the Calder Valley, particularly the upper Calder Valley. I note what the Statement said about the serious amount of money spent on flood protection, particularly in Mytholmroyd and Hebden Bridge. The upper Calder Valley is of course a place where we have steep valleys and no flood plains. Therefore, however good the work that will be done in the valley bottom, work has also to be done in the uplands. It seems to me that these things should go hand in hand, so we have to look very seriously at the uplands because the work that was done in the upper Calder Valley is seriously stressed now. I hope that is taken in. Living in Calderdale now, we are at the latter part of the local plan preparation process. A revised draft has been produced, consultations are taking place and an inspector has been appointed. Can the Minister assure me that an inspector looking at a local plan will look at the issue of houses being built on a flood plain? Some 600 houses are proposed in the Blackburn Valley. Will that be looked at in the next few weeks?

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, badger, fox, hawks etc etc Infrastructure The local schools will not cope with extra headcount in the locality. There are not enough doctors, dentists, etc. The roads are clogged up as it is. Again see the sustainability reports, this is a rural site, the residents will be driving, they will not be using public transport.

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

Duty to Co-operate Reason:

Calderdale council has not liaised with all neighbouring councils.

Suggested Modifications:

Remove LP0026,LP0952,LP0177 & LP1625 from the Local plan. Liaise with other authorities to take Calderdale's additional (highly questionable) housing need so as to prevent flooding in Calderdale which according to the Environment Agency is at 'unique risk' of flooding. Prepare post Brexit economic forecast. Increase housing densities in Brighouse to save Greetland Green Belt at the four locations/sites listed.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609733>

Comment ID **HRU1373**

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

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:

Flood risk 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:

Flood risk 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 Flood Risk: The NPPF states that planning policies and decisions should promote public safety and take into account wider security and defence requirements by: a) anticipating and addressing possible malicious threats and natural hazards... This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.' February 2020 once again saw Black Brook burst its banks and turn into an extended expanse of fast flowing water, posing a risk to both life and property. A large portion of the land proposed in the local plan became water logged because of the flooding. The field was not just water logged, but had running water passing over it. The water was deep and fast moving. The water was forcing its way through drystone walls, which acted as dams. This was not a small amount of flooding, and it was not the first time it has happened. This land floods on a routine basis. The level of flood risk highlighted in the site report is not fully represented. The houses on Woodfield Drive are already at risk of being flooded. Property on Woodfield Drive has already been damaged due to flooding. To increase the chances of flooding to existing property by building on this highly sensitive land is against NPPF policy, and this land should not have been put back into the Local Plan. This land was previously removed due to the way in which it floods. Flooding is already a more prevalent risk due to climate change, to remove the sloping grasslands that currently have a crucial role in preventing further devastation to the area due to flooding is unsustainable and against NPPF policy. The lands acts as a sponge soaking up water. No sufficient mitigation has been referred to anywhere in the Local Plan regarding this high-risk flood area. Both Local and regional press have reported on the flooding that took place on this land during the consultation period of the Local Plan. The community, Calderdale and the whole of Yorkshire have been made aware of the issues we face concerning flooding, in this small area of a small village in Calderdale. The floods here are news worthy. To build here is totally unsustainable. To suggest that the issues we face concerning flooding can be mitigated against is totally unsubstantiated, and not realistic. It is not a small amount of water that the land here has to deal with. There is far less sensitive land available in Calderdale. The area must not be put at risk because the Local Plan had to be put together in a hurry, and with out of date economic growth figures. Please use these links to view video footage of how badly this plot floods:
<https://www.facebook.com/lee.roberts.3363334/videos/pcb.2616363351819218/228186281677660/?type=3&theater&ifg=1>
<https://www.facebook.com/lee.roberts.3363334/videos/pcb.2616363351819218/228186385010983/?type=3&theater&ifg=1>

<https://www.facebook.com/lee.roberts.3363334/videos/pcb.2616363351819218/228186345010987/?type=3&theater&ifg=1> Questions concerning the figures surrounding the housing requirement: The Objectively Assessed Need for housing that the council relies on to make population predictions is based on out of date information, and therefore must be questioned. In addition to this, the council's estimations for annual job growth assumes that Calderdale will experience rapid and constant growth. This is not realistic and has the effect of raising the housing requirement in such a way that it becomes harmful and unsustainable. In 2016 the WYCA (West Yorkshire Combined Authority) published its Strategic Economic Plan to cover employment growth for the Leeds City region to cover the period up to 2036. They estimated 35,700 net additional jobs in that time. In part, it is these figures that Calderdale have based their projected employment growth on, however, the Leeds City region has produced below average employment over the past 30 years but in their Strategic Economic Plan they envisage well above average growth in the next 15 years. This is extremely optimistic given that the current unemployment rate in Yorkshire is 4.3% which is the second highest of any region in the UK and is currently increasing. In their economic projections, Calderdale are hoping that the 'Northern Powerhouse' (which doesn't actually exist except on paper) and HS2 (although how?) will generate historically unprecedented rates of employment growth. This forecast means that Calderdale will miraculously go from below average employment growth to significantly above average growth. Calderdale need to revisit their economic forecast which is based on the assumption that our economy will grow because of the effect of the Northern Powerhouse which is not evidenced in any way. And because they have over-egged the economic growth, Calderdale need to find more land to build on. If their economic growth was more realistic, there would be no need to build the extra houses.

Removal of Green Open Space: I, like many, many other residents, use the public right of way which stretches down the side of the primary school and then runs along Black Brook, and on a regular basis. There is a prevalent walking culture in the community, and this particular public amenity is well used due to its picturesque setting and tranquil nature. We often see wildlife along this public right of way, which provides extra appeal to the walk. If the development proposed in the local plan is passed, then I would not feel safe walking along this footpath anymore. As a young woman, I would not feel safe walking along a long, closed in path. Who would? The development would close in the path and we would lose visibility. It would attract crime. On top of the increased crime risk, the landscape of the area would be destroyed and the public right of way would completely lose its appeal. We power walk and run along this public right of way, in a time when we are nationally fighting obesity, destroying this type of public amenity has serious outcomes for a community that relies on such an amenity for a safe place to take exercise. The points I have made are supported by NPPF policies, which state that developments should not increase the risk of crime and disorder, or the fear of crime. The NPPF also states that Planning policies and decisions should protect and enhance public rights of way and access. 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.

Traffic and Air Quality: There is no mention of road traffic constraints at the West Vale traffic lights. However, as someone who lives in the area, I am obliged to inform the inspector that the level of congestion at the traffic lights has backed up as far back as the primary school at times. This is a considerable level of congestion, one that is currently unmanageable, 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 travelling 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:

The consultation process is supposed to be easily accessible. It was not. The IT system had many glitches and does not run smoothly or efficiently. An entire generation of people were practically excluded from the consultation period, due to how convoluted the process is to navigate. It has been a highly daunting process, one which many have given up on, which does not seem fair, given that this is such an important issue within our community.

Suggested Modifications:

Remove this land from the local plan.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609775>

Comment ID **HRU1383**

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

Person ID: **1243971**

Name: **Mr Steve Hannah**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The Local Plan does not address the implications of the National Planning Policy Framework, especially, NPPF Para 177 and the associated PPG in the Sustainability of Greenbelt Sites. According to the NPPF Para 143 under 'Proposals affecting the Green Belt' it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' The very special circumstances do not apply. Other reasons not legally compliant. Residents of Greetland not made aware of proposal and given opportunity to comment. The other reasons cited for excluding sites such as Green Belt, Access, Wildlife issues, Flooding constraints all apply to sites LP0026, LP0177, LP0952 and LP1625 and therefore these sites should equally be rejected from the Local plan. Importantly, I would also comment that plans LP0026 (The Gate Farm), LP0177 (Land adjacent Ellistones Place), LP0952 (Land at New Gate Farm) and LP1625 (Land to the west of Silverdale Terrace) should not be considered as separate

proposals. They are so interrelated (sited within a small 1 km area along Saddleworth Road) that they can only be assessed fairly if considered as a whole. By splitting them out as separate plans the full picture is being concealed. My comments therefore are relevant to each of the plans LP0026, LP0177, LP0952 and LP1625 and should be considered as equal objections to all four sites.

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

Sound Reason:

My main points of objection are as follows: Loss of Greenbelt land Increased risk of flooding Loss of Wildlife Habitats Lack of Infrastructure Traffic congestion, Increased air pollution Loss of Greenbelt Land Loss of amenity Loss of public footpath routes Creation of urban sprawl, Loss of wildlife habitat - foxes, badgers, bats, rabbits, deer exist within proposed development sites and adjacent areas The NPPF at a para 133 states that - "The Government attaches great importance to Green Belts" and at para 136 that - "Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified" At para 144 it further states - "local planning authorities should ensure that substantial weight is given to any harm to the green belt" and at para 145 - "a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt" Building on these sites is contradictory to all of these statements. When each of the 4 sites are reviewed together a large and disproportionate area of open space would be lost to this small community. At para 137 the NPPF states 'Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.' I do not agree that the authority in this case has satisfied these conditions. There are many other sites, including disused mills, within the Calderdale catchment that do not sit within Greenbelt Land that could be considered for development before ruining for ever the Greenbelt Land in these sites. Increased risk of flooding Para 155 of the NPPF states that 'Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas of highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere' Losing the fields will reduce the potential for water to be slowed down before it enters the river. Run off will increase and the rate water reaches the river/flood plain will increase therefore increase the frequency and severity of flood (which it already does); see images attached. Loss of Wildlife Habitats Para 177 NPPF states that 'The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site'. I would argue that building on the land which is included in these proposals will be extremely detrimental to the wild animals within the area. No mitigation can prevent the impact of urban sprawl and the destruction of their natural habitats. Lack of Infrastructure The local schools are already full. The local dentists have long NHS waiting lists. The GP surgery is full and often can't accommodate appointment requests. Adding an additional 600+ houses and the associated increase in residents is simply unsustainable. The existing drain system cannot cope with rain water at present and raw sewage is regularly seen entering fields and the Black Brook stream when it rains. The sewers also regularly contaminate the footpath which runs along side the footpath below the proposed development sites. Traffic congestion, air pollution and noise pollution Greetland and West Vale already suffer chronic traffic congestion, The village is already at breaking point at peak times and the roads cannot cope with the existing volume of traffic, let alone adding to that with these proposed developments. At school drop off times Saddleworth Road becomes a single lane road due to the parked cars on both sides. It becomes an obstacle course to get through and the large lorries that frequent the area make it dangerous for road users and pedestrians. I fear for the lives of the children trying to get to school daily.. Increased air pollution More houses, more people, more cars = more air pollution. Less flora to with the loss of fields/trees further compounds the negative impact of increase emissions/pollution.

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

Duty to Co-operate Reason:

Suggested Modifications:

retain greenbelt do not develop

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609782>

Comment ID **HRU1389**

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

Person ID: **1243980**

Name: **Mrs S Bird**

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 Flooding Based on the location of my property, my primary objection to the proposed local plan has to be risk of flooding. The NPPF states that (p.155) i) '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,' and also asserts that ii) planners and policy makers should 'recognise that some land can perform many functions, such as [" "] flood risk mitigation' (p.118). On numerous occasions throughout previous years, I have witnessed the river bust its banks and completely submerge the development site LP0177. I have attached photographs and recordings which evidence the vast extent, spread and depth of water which very recently (date) covered the flood-plain once again. One attached photograph clearly shows water from the Black Brook flooding a neighbouring garden and property, and another shows water of an approximate depth of 1.25m at the foot of my own garden. I have also attached evidence of a similar volume of water submerging the land during March 2019 and images from the Boxing Day Floods in 2015. From this evidence, it is abundantly clear how flooding in this area occurs frequently and poses a real and direct threat to the safety and of both local residents and property. I therefore assert that the issue of flooding has not been given adequate consideration scrutiny or challenge at the plan-making or decision-making stages of development proposals for the area and not enough is being done to prevent flooding this in the future were the plans to go ahead. Building on this land would be catastrophic for both local residents and those living further downstream who rely on the floodplains, grasslands and trees to mitigate flooding. Furthermore, When I first moved into my property in 2014 (before the well reported 'Boxing Day Floods'), I found it very difficult to get insurance: the first company approached, refused insurance completely due to the close proximity to a flood plain; the second company I approached quoted an annual premium of Â£7000, again, due to the close proximity to a flood plan and 'a high risk of flooding'. It therefore appears that the risk of flooding in the Greetland area, particularly sites LP0177 is recognised by multiple other companies/agencies who have comparatively little

local knowledge of our local area. How is it then that this issue is not adequately acknowledged by CMBC who purport to and stand for and represent our local area? Were the plans to go ahead, it is very likely that problems that have plagued other areas of the Calder Valley (for example Hebden Bridge where homeowners and businesses cannot insure their properties) and Yorkshire (for example ; where the army has been called in to rescue residents) would become issues in this area. Figures suggest that 30 million has already been spent in flood defence in Calderdale; the Prime minister, Boris Johnson has called for councils to stop allowing building on flood plains ; I therefore fail to see how this plan, which directly contradicts and contravenes both current legislation and the Prime Minister's statement, is, and even can be considered by CMBC as a just, appropriate, viable development option. As I will continue to detail below, I also fail to see how 'the development would provide wider sustainability benefits to the community that outweigh the flood risk' (NPPF p60a). Ineffective Use of Land Secondly, the land proposed for the Local Plan is stipulated as 'Greenfield'. According to the NPPF, planning policies and decisions should 'Give substantial weight to the value of using suitable brownfield land ' (p.118). Again, it appears that the use of greenfield land has contrary been prioritised by the developers of the Local Plan who plan to develop in this location despite alternative, viable brownfield sites being available and unused in the Calderdale area. The use of greenfield land as a primary source of available land is therefore in direct opposition to the guidance established in the NPPF and I would argue that policy making authorities have not adequately demonstrated that they have 'a clear understanding of the land available in their area' (p.67). Similarly, paragraph 122 of the same section proceeds to discuss how planning and policy decisions 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'. Our ward already has the highest percent of cars per household, and were the build to go ahead, this would increase further and disproportionately. All roads throughout the local area (for example, Saddleworth Road, Rochdale Road and Stainland Road) are extremely busy roads: at peak times, travel on these roads and surrounding routes is extremely restricted and residents often have to endure long queues. During school times, traffic on Saddleworth Road is already reduced to a single lane. Currently, there have been no plans to develop infrastructure for the development sites. It is therefore questionable how this semi-rural area - which lacks adequate public transport (on Saddleworth Road, there is one bus per hour) and cannot cope with current levels of congestion - could effectively and safely cope with an increased volume of traffic. The Local Plan does not therefore sufficiently evidence how 'transport issues [have] been considered from earliest stages of plan-making and development proposals' (p102). Similarly, in contra version to the framework, nor does it provide any suggestion or mitigation as to how 'the potential impacts of development on transport networks can be addressed' (p.102a) or suggest how developers will ensure that any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree (p.108c). The issue of infrastructure and transport clearly show how the creation of 600 homes alongside one road is unrealistic and unsustainable. This is intrinsically linked to the issue of air pollution: the proposed plan would inevitably (both during and for a long period after the development) necessitate an increase in air pollution for the local area. This is in direct opposition to government legislation set to (conversely) reduce air pollution. The government has set clear targets to reduce air pollution and therefore it does not make sense for Calderdale Council to propose such a vast number of homes to be built and concentrated in a relatively small geographic area. This will affect all residents in the area and is particularly worrying for children attending Greetland school situated alongside Saddleworth Road. As polluted air is heavier than 'cleaner' air, it is likely that this will cumulate in the area at the foot of the valley and the area surrounding Black Brook (potentially also affecting natural habitats too). Young children will be forced to breathe in highly polluted and toxic area which, as acknowledged by government legislation (for example, The Clean Air Strategy) could have long-lasting debilitating long-term health effects. I would therefore argue that this development is not 'appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment' as stipulated as necessary in the NPPF framework (P180). Schools The NPPF states

(p.94) 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: 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.' However, in direct opposition to these notions, Greetland's Local Plan has not seen any of this work done in relation to school places and as far as I am aware, local schools have not been adequately consulted on the proposed plan. Secondly, as two main schools in the area are now academies (Greetland and West Vale), I understand that currently they cannot be forced to extend or expand. This is concerning as the schools ; especially Greetland Academy- are nearing full to capacity at the present time and I cannot see how this can, or could, be mitigated with the proposed Local Plan: children already living in Greetland may face a situation where there is no place available at their local school and could face the possibility of travelling (thus increasing travel pollution and congestion) to educational sites out of the district proximity. Similarly, as Calderdale currently allocate secondary school places based on the notion of feeder schools, the increased demand for primary places will also negatively impact Greetland residents during the long term as access to and choice for secondary education will be detrimentally affected. Again, this makes the sustainability of the local plan doubtful. Conserving and Enhancing the Natural Environment The NPPF states that 'planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscape' (p.170/170a); recognise 'the intrinsic character and beauty of the countryside (p.170b) and 'protect areas of tranquillity'. The footpaths and woodland surround Black Brook are, and have been, revered by residents of Greetland for many years ; in my family, generations have regularly spent time in this area and I feel that to remove this opportunity for future generations is wrong and unjust. As a child, walking, playing and spending time in this part of the locality taught me so much about the environment we live in from habitats to climate change, to flooding. Such first-hand learning experiences would certainly not have been possible without such an area. Similarly, as a whole community, we clearly need access to open green spaces and the Black Brook area provides just that; such a large proportion of our community (myself included) routinely use these public rights of way to walk their dogs, take exercise and generally walk and spend time ; in fact, the area surrounding site LP0177 , is being used just as the NPPF intends and states land should be used: 'to promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other' (p.91a) and 'to support healthy lifestyles' (91b). Were 600 houses to be built along this site, this amenity and the opportunities it provides would be lost forever and, rather than being revered and protected, would sadly be destroyed. This, unfortunately, comes at a time when Calderdale Council has been identified as a 'deprived council' with primary concerns being the issue of the quality of residents' living space. Rather than removing open spaces which are frequented by and enjoyed by the community, I feel that the opposite needs to be done: CMBC need to look at improving the living spaces of their residents and could adequately do this by protecting greenfield and green belt land which can afford communities free and accessible facilities. Similarly, as briefly mentioned above, this area hosts a wide range of habitats and a host of different wildlife species reside alongside or near to the Black Brook area. These include species that the RSPB claim are decreasing in number (such as the woodpecker). Although the local plan does detail some stipulations regarding building proximities, I fear this will be too little and question whether such stipulations are founded on solid, evidence-based research or detailed, long-term biodiverse mapping. For such reasons, I feel that development on these sites is not environmentally sustainable. Furthermore, the area surrounding site LP0177 is currently susceptible to bat roosting and indeed local residents have had planning permission restricted, only being allowed to build between the months of October and April to avoid bat roosting months. Also, residents have had to make amendment to their original plans (for example, undertaking a bat survey, inclusion of bat boxes in their extensions and altered buildings). By studying the local plans, it is unclear how developers intend to act in line with the existing stipulations regularly enforced by CMBC and it is unclear whether developers will be bound by the same

terms as local residents. This is an issue with needs further consideration and clarification to avoid the development resulting in 'loss or deterioration of irreplaceable habitats' (NPPF p.175c)

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/5609785> ; <http://calderdale-consult.objective.co.uk/file/5609781> ; <http://calderdale-consult.objective.co.uk/file/5609780> ; <http://calderdale-consult.objective.co.uk/file/5609776>

Comment ID **HRU1391**

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

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 appraisals for the sites at LP0026, LO0177, LP0952 & LP1625 are not fit for purpose. The consultation period has not properly been publicised by the council to the public.

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

Sound Reason:

Sustainability 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. 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 9 are 'uncertain', 4 are negative and just 3 positive. (1 is n/a) The council can only list 3 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 9 ' TO PROTECT AND ENHANCE BIODIVERSITY AND GEODIVERSITY ' is marked as uncertain on the following basis: ' The overall impact is uncertain; although the site is in excess of 800m from a SSSI and a LWS, it is within the Wildlife Habitat Network and is within the 7km buffer zone of the SPA /SAC. In addition, the site is within an area where priority habitats are at a medium vulnerability to Climate Change impacts' To the my eyes this assessment is clear in that there will be a negative impact for this objective. The site it includes priority habitats. Flooding This site floods, see the attached photo of flooding from 7/02/2020. This site acts as a natural water store when it rains, it slows down the transit of water into the Black Brook which flows at the bottom of the site. If this site is used it will ensure that West Vale, Elland and Brighouse experience more frequent and more severe flooding at it will take away a vital flood plain. Using this site is against NPPF

paras 155 & 163. If this land is developed it will put lives in danger. According to the Environment Agency the Calder Valley is 'at unique risk of flooding'. The risks cannot be mitigated against, the only mitigation is to build housing which is not on steep sided valleys and which is away from water courses. This site is on the side of a valley, it has a river, the Black Brook, running in the valley bottom. It regularly acts as a flood plain. The DEFRA secretary, George Eustace MP, has this week confirmed that natural flood management measure should be retained. Building on this land will destroy natural water management features. Lord Shutt lives next door to this site and he said to Lords earlier this month: My Lords, I declare the interest that I live in Greetland in the Blackburn Valley, less than a mile from the confluence with the Calder Valley. I saw the floods yesterday; I saw the Black Brook rise and come over its banks, and I saw it flood into several fields in front of my house from my own front window. I saw the same thing on Boxing Day in 2015. I am well aware of how those floods seriously affected Sowerby Bridge, Mytholmroyd, Hebden Bridge and Todmorden, and that has happened again this time. A mere 38 years ago, when I happened to be mayor, I had to visit various people, while wearing my chain, who had been flooded, so it is nothing new that we have floods in the Calder Valley, particularly the upper Calder Valley. I note what the Statement said about the serious amount of money spent on flood protection, particularly in Mytholmroyd and Hebden Bridge. The upper Calder Valley is of course a place where we have steep valleys and no flood plains. Therefore, however good the work that will be done in the valley bottom, work has also to be done in the uplands. It seems to me that these things should go hand in hand, so we have to look very seriously at the uplands because the work that was done in the upper Calder Valley is seriously stressed now. I hope that is taken in. Living in Calderdale now, we are at the latter part of the local plan preparation process. A revised draft has been produced, consultations are taking place and an inspector has been appointed. Can the Minister assure me that an inspector looking at a local plan will look at the issue of houses being built on a flood plain? Some 600 houses are proposed in the Blackburn Valley. Will that be looked at in the next few weeks? Green Belt This site performs well against the five green belt purposes. I attach Green belt survey form. The Inspector will note that this form, unlike the sustainability appraisals, does not contain any uncertainties and the council has been able to answer questions pertaining to the land. 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.

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. 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 The site is part of a wildlife corridor and is home to bats which roost in trees on land adjacent to the site. loss of habitat for a protected species cannot be mitigated against.

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

Duty to Co-operate Reason:

Suggested Modifications:

Remove LP0952,LP0177,LP1625 & LP1625 from the local plan. Increase densities at Brighouse.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609787> ; <http://calderdale-consult.objective.co.uk/file/5609738>

Comment ID **HRU1394**

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

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:

This is not legally compliant, hardly any community involvement, difficult to follow the objection process, not much guidance on following the legsl information, ie all the different reports etc.

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

Sound Reason:

My family and I moved to Greetland because we fell in love with it's green beauty and views, being semi rural, the nature walks outside our front door and the kids loved the fresh open air. My objections are: Loss if Greenbelt: Land is precious and should be protected. Loss of greenbelt would have a huge impact on the local wildlife and the local residents and their well being! The loss of greenbelt would lead to a huge increase in urban sprawl! Flooding: The proposed plan is for high rise flood areas and any development and loss of the fields, which soak up rainfall and spring water, will be detrimental to houses and businesses in and around West Vale! This would also impact on surrounding areas around the Calder such as Brighouse and Mirfield. Areas that have had development on flood plains have proven to be a huge issue over the last couple of weeks. Surely this is proof that building on flood plains is not the right solution for the housing issue. Infrastructure: Greetland is a village not a town and will not cope with 600 new homes, such as the doctors (waiting times are already unreasonable), school (class sizes already at the top end) and dentist (only one current local NHS dentist). The congestion of cars will reduce air quality and therefore the health of our future generation will be in jeopardy. Wildlife: The community enjoys the local wildlife of many species. Some are protected, ie bats, deer, herons, owls etc. To remove their livelihoods would be a travesty! Air Pollution and Traffic: West Vale/Greetland is in a valley and therefore traps fumes from traffic. Increasing the amount of traffic via these proposed developments would cause ill health to many people, children and the aged. Currently West Vale cannot cope with the amount of traffic travelling through, as 4 directions of traffic flow through.

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

Duty to Co-operate Reason:

Suggested Modifications:

Sites that are already Brownfield sites should be considered.

Comments:

Additional Evidence Link:

Comment ID **HRU1404**

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

Person ID: **1243939**

Name: **Mr George Robinson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Looking at the government's information on the protection of green belt it states: Protecting Green Belt land 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 5 purposes: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (c) to assist in safeguarding the countryside from encroachment; (d) to preserve the setting and special character of historic towns; and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. My objection to the proposed building in the Greetland area is that it goes against the 5 purposes of what green belt stands for. By building on plot LP0177 it will connect the current housing developments together causing urban sprawl. As this development is moving up the valley it ultimately will lead to the neighbouring villages connecting with each other. The Greetland area has already seen massive development over recent years and has been heavily built on causing the loss of much of the land that should be safeguarded for the future to lessen the impact humans are having on this area. These developments include: Bankfield Grange, High Meadows, Woodfield Drive, Woodfield Grange Nursing Home, Woodfield Avenue, Greenholme Court, Longley Gardens, Minster Close, Sunnybank Drive, Sunnybank Lane, Sunnybank Crescent, Bradley Court, Ellistones Place, Daleside, Upper Ellistones Close, Trenance Gardens plus many private housing builds. As you can see a long list. My other objection to the legality of the proposed building project is the area suffers will severely flooding, the land in the bottom of the valley is a class 3a high-risk flood area, all too often we now experience flood issues most recently with storm Ciara. This flooding causes severe issues in the lower parts of Greetland with businesses, sports clubs and houses affected. The proposed building project will cause even more surface runoff with nearly zero natural earth to absorb any of the water holding it back. Flooding has over recent years become far more of an issue with the heavy development already seen in the area, adding to this will only make the issues worse. The information being passed on by the council is extremely poor, the planning portal is extremely hard to navigate, is completely un-user friendly and requires updating, there has been little or no clear signage informing people of these development plans, and unless you have the internet it is difficult to be able to object which discriminates against some of the community, especially the more elderly generation.

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

Sound Reason:

The local infrastructure is already struggling with the amount of traffic in the area and additional housing will only add to this issue, with both sides of Saddleworth Road already built on there is no way of improving the road network. West Vale is a bottleneck and it is common for traffic to be backing up in all directions, with many cars queuing for a significant amount of time in traffic jams polluting the local area. The school is already at capacity, this could obviously be extended however with the current road network, any additional pupils would exacerbate the current traffic issues, and would become a health and safety concern with the road becoming blocked on both sides of the road with parents dropping and picking up their children from school. Not only is there the increased air pollution but noise and light pollution from cars is also a concern affecting local residents that already live in the area. There are many species of animals living in the area, often we see Deer, Hedgehogs, Field Mice, Rabbits, King Fishers, Heron, Pheasants, Newts, Frogs, Badgers, Voles, Bats, Foxes, Squirrels, Owls and an array of songbirds. By taking away this green belt many of the local animals will be losing their homes and natural habitat, should humans be prioritised over the local wildlife? Should Gods own country be turned into a concrete jungle fit for only the crafty urban fox or pigeons? Saddleworth Road can already be attributed to the killing of many Hedgehogs which is extremely sad to see as they are protected under schedule 6 of the Wildlife and Countryside act of 1981 making it illegal to kill or capture them. By taking away their habitat and increasing the number of vehicles that will be in use their numbers are sure to fall even further. Looking at the local plans that have been put forward it shows that Greetland has been combined with Elland causing a misrepresentation as Elland is a much larger area than Greetland and is also a HX5 postcode as opposed to the HX4 postcode of Greetland. This is an attempt to hide the large volume of building in a 1/2 mile area of a small village, which is completely disproportionate to the proposed development sites in Elland. How can this be a sound judgment? Looking a little further afield none of the other small villages similar to Greetland have got such a large-scale development plan facing them. I believe the reason area LP0177 and the others on Saddleworth Road have been selected is that they will be relatively easy to build on and sell, where as other brownfield sites are not so desirable. Also with the ever-expanding population Green Belt land needs to be kept for farming and the production of food, once this land has been built on it is lost forever, I don't believe there are enough exceptional circumstances being put forward for it to be built on hence my objection.

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

Duty to Co-operate Reason:

The duty to co-operate states that councils and public bodies should -“engage constructively, actively and on an ongoing basis” To develop strategic policies which result in sound local plans, I am unable to find any evidence that Calderdale Council has engaged with the Highways Authority to develop a strategy for dealing with the large volume of extra traffic that will be created by the development on LP0177 and other surrounding development plots in Greetland. Speaking with a local councillor in a neighbouring village this has now been going on for 12 years and the aim is to be able to hit housing targets set by government in London no matter what the price.

Suggested Modifications:

Calderdale Council should review all available non-green belt land and disused existing buildings to be developed instead. LP0177 needs to be taken off the current plan as it is highly unsuitable and developing on it would not be beneficial to the local area as stated in the points above.

Comments:

Additional Evidence Link:

Comment ID **HRU1418**

Site ref (if applicable):

Person ID: **1243823**

Name: **Miss Alison Thelwell**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I strongly object to this proposal on the grounds of A. The increased traffic and noise pollution which will be generated. We are currently about half way through gas repair works at one of the key crossroads in west vale and at all times of the day traffic heavily builds up. This is an indication of how congested the area will become on a daily basis. At the other West Vale crossroads turning from the Elland direction towards Halifax is already difficult sometimes with just one car moving through the lights in time and this goes on to strain the rest of the road network. I believe it was considered a few years ago that it wouldn't be possible for a second filter lane to be created to ease congestion so this will be something which will only become an even greater problem. B. The newly generated traffic from the proposed site could lead to Sunnybank road becoming a rat run as commuters use it to avoid one set of traffic lights on the way to Halifax. C. Our current Schools are already at full capacity, how will it they handle the increased population? Our current schools cannot surely handle this increase. Greetland on its own is only a small village and cannot be expected to cope with this. D. The lower grounds of the village are very well known to become flooded during spells of bad weather. This has been well publicised this month alone. Removing much needed green belt land will no doubt push the problem elsewhere. We need the open fields to soak up excess rainfall and act as a natural flood defence system. Tarmaced housing estates in its place will lead to catastrophic consequences in this situation. E. The area has current derelict brown field sites. Why cannot these be considered as potential sites which will improve the area and in turn save our green belt land.

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

Sound Reason:

I strongly object to this proposal on the grounds of A. The increased traffic and noise pollution which will be generated. We are currently about half way through gas repair works at one of the key crossroads in west vale and at all times of the day traffic heavily builds up. This is an indication of how congested the area will become on a daily basis. At the other West Vale crossroads turning from the Elland direction towards Halifax is already difficult sometimes with just one car moving through the lights in time and this goes on to strain the rest of the road network. I believe it was considered a few years ago that it wouldn't be possible for a second filter lane to be created to ease congestion so this will be something which will only become an even greater problem. B. The newly generated traffic from the proposed site could lead to Sunnybank road becoming a rat run as commuters use it to avoid one set of traffic lights on the way to Halifax. C. Our current Schools are already at full capacity, how will it they handle the increased population? Our current schools cannot surely handle this increase. Greetland on its own is only a small village and cannot be expected to cope with this. D. The lower grounds of the village are very well known to become flooded during spells of bad weather. This has been well publicised this month alone. Removing much needed green belt land will no doubt push the problem elsewhere. We need the open fields to soak up excess rainfall and act as a natural flood defence system. Tarmaced housing estates in its place will lead to catastrophic consequences in this situation. E. The area has current derelict brown field sites. Why

cannot these be considered as potential sites which will improve the area and in turn save our green belt land.

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

Duty to Co-operate Reason:

I strongly object to this proposal on the grounds of A. The increased traffic and noise pollution which will be generated. We are currently about half way through gas repair works at one of the key crossroads in west vale and at all times of the day traffic heavily builds up. This is an indication of how congested the area will become on a daily basis. At the other West Vale crossroads turning from the Elland direction towards Halifax is already difficult sometimes with just one car moving through the lights in time and this goes on to strain the rest of the road network. I believe it was considered a few years ago that it wouldn't be possible for a second filter lane to be created to ease congestion so this will be something which will only become an even greater problem. B. The newly generated traffic from the proposed site could lead to Sunnybank road becoming a rat run as commuters use it to avoid one set of traffic lights on the way to Halifax. C. Our current Schools are already at full capacity, how will it they handle the increased population? Our current schools cannot surely handle this increase. Greetland on its own is only a small village and cannot be expected to cope with this. D. The lower grounds of the village are very well known to become flooded during spells of bad weather. This has been well publicised this month alone. Removing much needed green belt land will no doubt push the problem elsewhere. We need the open fields to soak up excess rainfall and act as a natural flood defence system. Tarmaced housing estates in its place will lead to catastrophic consequences in this situation. E. The area has current derelict brown field sites. Why cannot these be considered as potential sites which will improve the area and in turn save our green belt land.

Suggested Modifications:

We are currently about half way through gas repair works at one of the key crossroads in west vale and at all times of the day traffic heavily builds up. This is an indication of how congested the area will become on a daily basis. At the other West Vale crossroads turning from the Elland direction towards Halifax is already difficult sometimes with just one car moving through the lights in time and this goes on to strain the rest of the road network. I believe it was considered a few years ago that it wouldn't be possible for a second filter lane to be created to ease congestion so this will be something which will only become an even greater problem. B. The newly generated traffic from the proposed site could lead to Sunnybank road becoming a rat run as commuters use it to avoid one set of traffic lights on the way to Halifax. C. Our current Schools are already at full capacity, how will it they handle the increased population? Our current schools cannot surely handle this increase. Greetland on its own is only a small village and cannot be expected to cope with this. D. The lower grounds of the village are very well known to become flooded during spells of bad weather. This has been well publicised this month alone. Removing much needed green belt land will no doubt push the problem elsewhere. We need the open fields to soak up excess rainfall and act as a natural flood defence system. Tarmaced housing estates in its place will lead to catastrophic consequences in this situation. E. The area has current derelict brown field sites. Why cannot these be considered as potential sites which will improve the area and in turn save our green belt land.

Comments:

Additional Evidence Link:

Comment ID **HRU1425**

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

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 consultation period has not been adequately publicised by the local authority. The sustainability appraisals contain too many 'uncertain' objectives. The NPPF has been ignored in large parts.

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, LP0177, has been assessed against 17 Objectives and the results are: 1 x n/a 3x positive 4x negative 9x uncertain The Council does not know the answer to 9 of the 16 objectives which relate to this site. That's 56.25% of the objectives being uncertain and 25% being negative. 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. some of the answers are simply unjustifiable see Objective re biodiversity. Surely removing Green Belt reduces biodiversity as habitat for herons etc will be lost if this land is developed This is unacceptable. The plan is unsustainable. There are too many unknowns for this site. Flooding This site is a flood plain, See the attached photograph. Lord Shutt Lib Dem life peer said of this specific site earlier this month: "My Lords, I declare the interest that I live in Greetland in the Blackburn Valley, less than a mile from the confluence with the Calder Valley. I saw the floods yesterday; I saw the Black Brook rise and come over its banks, and I saw it flood into several fields in front of my house from my own front window. I saw the same thing on Boxing Day in 2015. I am well aware of how those floods seriously affected Sowerby Bridge, Mytholmroyd, Hebden Bridge and Todmorden, and that has happened again this time. A mere 38 years ago, when I happened to be mayor, I had to visit various people, while wearing my chain, who had been flooded, so it is nothing new that we have floods in the Calder Valley, particularly the upper Calder Valley. I note what the Statement said about the serious amount of money spent on flood protection, particularly in Mytholmroyd and Hebden Bridge. The upper Calder Valley is of course a place where we have steep valleys and no flood plains. Therefore, however good the work that will be done in the valley bottom, work has also to be done in the uplands. It seems to me that these things should go hand in hand, so we have to look very seriously at the uplands because the work that was done in the upper Calder Valley is seriously stressed now. I hope that is taken in. Living in Calderdale now, we are at the latter part of the local plan preparation process. A revised draft has been produced, consultations are taking place and an inspector has been appointed. Can the Minister assure me that an inspector looking at a local plan will look at the issue of houses being built on a flood plain? Some 600 houses are proposed in the Blackburn Valley. Will that be looked at in the next few weeks?" 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 £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. The Housing Requirement is overstated in the Local Plan. The housing requirement calculated in the Calderdale Local plan is significantly overstated. The Council relies on the Report of Turley: 'Modelling the Economic Implications of the Proposed Housing Requirement'. This report is unsound. It projects that Calderdale will create a significant number of jobs over the next 15 years, these jobs need workers to fill them and the workers themselves will of course need homes. The resulting projected housing requirement is incorporated in the Local Plan. We are told the jobs will be filled by migrants etc and Turley advise that Calderdale will experience migration numbers above the historical average. Turley relies on data from 2014 which is before a referendum on the UK's EU membership was even contemplated. The historical average relied upon by Turley includes migration as a result of the UK being an EU member state and its participation in the EU's core principle of free movement of people. The EU is an economic trade block with a population of circa 400,000,000 people which now the UK is no longer part of. Free movement of people ends in December 2020, access to workers will be significantly reduced as a result. In any case, according to migration watch net migration into the UK has fallen since 2015: : www.migrationwatchuk.org/statistics-net-migration-statistics. 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. 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. This site protects against Urban Sprawl. The revisions to the plan represent further unsustainable development with a disproportionate amount of new homes proposed across four sites in Greetland with 1041 additional units of the 1708 on new housing sites (over 60%) proposed in the Elland area. The function of the planning system is to facilitate sustainable development that makes a positive contribution to the environment. It is not the role of the Council to release demonstrably unacceptable sites within the Green Belt to meet a housing target! The Inspectors letter of 16 July 2019 to the Council notes (Para 14) that "local plans should meet objectively assessed needs unless adverse impacts of doing so would significantly and demonstrably outweigh the benefits" this is exactly the case in Calderdale. Later, where the Inspector asked the council to review the option of 'the supply of more suitable and available sites elsewhere', however, the further work on the additional sites considered (incorrectly by the Council) to be 'suitable and available' are not, in fact, suitable or available, and in any case it has been revealed that this option is simply not sustainable. Housing Densities within the Local Plan If Calderdale increased housing densities elsewhere in the plan this site would not be required. The Brighouse housing densities are unsustainable and are not an 'Effective use of Land' per Chapter 11 NPPF. Densities should be increased in the Brighouse allocations to save this site see NPPF paragraphs 122 & 123 Infrastructure All 4 sites, 600 houses, lie alongside 1 main road, Saddleworth Road. The side roads are very narrow most of them being single track. Peak traffic times see cars queuing up Saddleworth 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 should have liaised more closely with all neighbouring local authorities.

Suggested Modifications:

Remove LP0952, LP1625, LP0177 & LP0026 from the local plan. Densities should be increased elsewhere to free up up these sites. The economic model should be revisited.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609795> ; <http://calderdale-consult.objective.co.uk/file/5609741>

Comment ID **HRU1426**

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

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:

I am writing to register my objection to part of Site LP0177, which I believe, lies within flood zone 3A ; the highest classification of flood risk. Preventative Measures Has an Environmental Agency Scientist been employed to measure river flow, how fast Black Brook floods and whether its banks are eroding in order to protect the surrounding area and ultimately West Vale further downstream? Have Hydrologists studied the flood plain in its original state compared to when there are heavy floods? If the development goes ahead, the area will have less capacity to absorb the rainfall. It is normal in very wet weather for the fields to absorb the water like a giant sponge subsequently releasing it more slowly without overwhelming the water courses. If the green belt is covered in concrete and tarmac, the land has no capacity for retention, water will simply rush straight down with inevitable consequences. Could existing and future residents be reassured by the Inspector at Calderdale Council that every effort has been made to study the Environmental Agency's detailed reports? What plans have been put in place for the excess water go if development takes place? Another scenario which has hit the headlines many times and the area was visited recently by the Environmental Minister, is Mytholmroyd/Hebden Bridge. There is photographic evidence of flooding for well over 100 years and is still causing destruction. What has been learnt from this to prevent the same situation happening in Greetland/West Vale in the future? I have never heard of West Vale flooding and pray this does not happen in the future. Who is ultimately accountable for the flooding in Mytholmroyd and Hebden Bridge for over a century? We cannot sustain these 'rare' incidents which are

now occurring many times in a decade! Who will be accountable when it's too late should the development in Greetland go ahead? Infrastructure What are Calderdale Council's plans for upgrading the infrastructure ie pre-schools, primary schools, doctor's surgeries, dentists and road network improvements to alleviate traffic congestion if the large housing development takes place? The air pollution is at a considerably high level at the moment and you can smell the exhaust fumes (see British Heart Foundation's report on our area). Toxic air potentially affects the normal electrical function of the heart and stays in the blood stream for at least 3 months! What impact does this have on children and parents walking to school now and in the future? The particularly congested roads in West Vale and Stainland Road leading to and from Greetland Academy and preschool, particularly at peak times, already causes a problem with parking and pedestrians are walking through pollution caused by the already excessive number of vehicles. Has anyone from Calderdale's Environment Department measured the pollution levels and can the Council's results be viewed anywhere online now or in the future please? Flooding Calderdale have declared a climate emergency and having records of the flood plain in its natural state over many years, I was shocked and surprised to learn of the proposed development in Greetland and in particular at the back of Woodfield Drive. Whilst walking in the area and viewing photographic evidence, particularly over the last month, the amount of flooding to the land and river in this area and its effect on home owners. With a greater risk of flooding, will residents and businesses be able to afford the inevitable increases in insurance premiums? 'Eye on Calderdale' document states that sometimes developers who are allowed to build on floodplain land are asked to contribute to the cost of flood protection measures as part of the planning process. Would this be put in place if the proposed development goes ahead? Also a quote from the Environment Agency, 12/2/20 Evening News, BBC Look North as follows, -"Unfortunately, the Calder valley is at unique flood risk. It's a very narrow steep sided valley and it doesn't take much to see flooding throughout the catchment right down through many communities. We see rapid onset flooding; low onset flooding as well and quite a high risk to life." Adrian Gill, Environment Agency. When a sudden high volume of water rushes down a water course, the force disturbs all kinds of debris taking it downstream potentially causing blockages and further flooding. Flooding also overwhelms the drains causing sewerage to spill out to the surface. This is not environmentally friendly and I assume that a Hydrologist, has assessed this? Will flood defences be put in place if this development takes place? As well as Greetland, surely the proposed development would have detrimental implications for the residents in Calderdale ie. lower Greetland and West Vale. Costly work has to take place each time a large area floods. This causes disruption to roads causing traffic problems and this has an effect on pollution. The pollution issue would increase permanently if the proposal goes ahead. The cost to residents, shopkeepers and the Council in this area will be significant and some will be not be able to get insurance. The fields and meadows at the moment, absorb water like a giant sponge. When its pouring down with rain, it is important to find out how fast the river is flowing and if the river is flooding, whether its banks are being eroded in order to protect the houses, villages and ultimately West Vale from flooding. The Council's identified flooding implication of the proposed development in Greetland would have far reaching implications for the residents of Calderdale. During the Boxing Day Floods in 2015, Elland Bridge was destroyed and resulted in a very costly rebuild, a rebuild which took over a year, causing significant disruption to residents of Calderdale. Work is still undergoing on building flood defences in and around Mytholmroyd which did not prove successful during the recent floods in February 2020 The traffic problems we encountered, the effect on air pollution, the financial cost to the council as well as local businesses was a well talked about issue within the area. It was a disaster. Nothing has been done to make the flooding less serious in this particular area and water levels peaked again over the last few weeks. How much more can people cope with? The council has spent millions of pounds on flood defences, which does not seem to have any effect in areas in the Calder Valley. Work to prevent flooding is the Environmental Agency's responsibility. My husband and I regularly walk on the public right of way running the stretch of the proposed development and we have seen first-hand the extent of flooding in this part of Greetland. Homes on Woodfield Drive could be flooded due if this development takes place and will continue to affect insurance premiums, not only there but other areas. We need to think about people's quality of life the stress it causes not only the elderly but

all concerned. Residents could have a bleak outlook now after living in beautiful and safe environment. The NPPF is clear that, -“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk” Has the Council adhered to this policy? We need to think about the effect on birdlife such as Herons, Kestrels, Kingfishers which are seen and enjoyed in this area. Is there a report on the effect on agriculture and ecology should the proposed development go hea 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/5609796>

Comment ID **HRU1429**

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

Person ID: **1243973**

Name: **Mrs Amy Hannah**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

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

Sound Reason:

My main points of objection are as follows: Flooding issue This affects the whole area and is relevant to all sites in question. The land put forward is unsustainable. Further development will result in additional surface run off. This in turn will contribute to further flooding. The fields considered for development currently act as a natural flood defence and even without the further development they are unable to cope with absorbing heavy rainfall. We have seen the effect of this in recent weeks and it has resulted in severe flooding in the area, flooding of Black Brook at the bottom of these fields and into West Vale. In 2015, the Boxing day Floods demonstrated this at its worst. Clearly, building more houses on these fields will cause major issue contributing to further more serious flooding. Calderdale council therefore have a duty of care to comply with current policy and legislation on flooding and they should remove these fields from the Local Plan. Para 155 of the NPPF states that ' Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas of highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere ' Effect on Greenbelt Land The NPPF at a para 133 states that -“ The Government attaches great importance to Green Belts ” and at para 136 that -“Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified” At para 144 it further states -“ local planning authorities should ensure that substantial weight is given to any harm to the green belt” and at para 145 -“ a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt ” Building on these sites is contradictory to all of these statements. If considering all of the sites as one as we should be doing, the development would mean a large and disproportionate amount of land and open space would be lost from this small community. This also includes the loss of public amenity, wildlife habitats (foxes, badgers, bats, rabbits, deer, birds of prey), loss of green space, loss of wildlife corridor, loss of public footpaths and the creation of urban sprawl. I believe such loss associated with Greenbelt will contribute to affecting our community's wellbeing and mental health in a negative way. The Greenbelt is free for the community to use and greatly benefits the vast majority of residents who utilise this on a daily basis. The land is a quiet, safe and therapeutic environment and is the centre of our community. To lose all this would be devastating. Increased air pollution The proposed plans would obviously create more air pollution due to more houses, more people and more cars. The single biggest air polluter is traffic, or road vehicles. More people die of air pollution than Malaria and HIV, this should be a consideration when looking at these proposed plans to develop on such disproportionate scales. The Clean Air Strategy 2018 states that - While we need to ensure economic growth, we also need to realise the 'cost of air pollution on health'. Infrastructure The increase in houses at this capacity will add a huge pressure to already full schools in the area. The schools are not big enough to

cope with this amount of new housing. The doctor's surgery is also full and already struggles to cope with the number of patients and appointment requests. The NHS dentists have long waiting lists without further increase to residents. There is one main road which runs through the proposed area which would not be sustainable for such an increase in traffic as a result of the development. The existing sewage system and drainage cannot cope with the current volume and with the rain water seen in recent times and in past years has caused the raw sewage to overflow into the footpaths and fields in the area. This problem would only increase with further development. Traffic congestion and noise pollution Greetland and West Vale already suffer chronic traffic congestion, The village is already at breaking point at peak times and the roads cannot cope with the existing volume of traffic, let alone adding to that with these proposed developments. At school drop off times Saddleworth Road becomes a single lane road due to the parked cars on both sides. It becomes an obstacle course to get through and the large lorries that frequent the area make it dangerous for road users and pedestrians. I fear for the lives of the children trying to get to school daily..

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

Duty to Co-operate Reason:

Suggested Modifications:

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

Comments:

Additional Evidence Link:

Comment ID **HRU1432**

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

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 **HRU1433**

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

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 LP0177. 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/5609797>

Comment ID **HRU1442**

Site ref (if applicable):

Person ID: **1243996**

Name: **Mr Gethin Jones**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Green Belt: As stated in NPPF: -“The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.” (NPPF, Para 133, 2019) -“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy” | ..makes as much use as possible of suitable brownfield sites and underutilised land.” (NPPF, Para 136-137, 2019) The Local Plan has failed to examine fully all other reasonable options and has failed to provide a compelling argument for exceptional circumstances.

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

Sound Reason:

Planned developments have to be proportionate to the size of our existing settlements. Infrastructure planning specifically in relation to healthcare needs to be prospective rather than retrospective. I have significant concerns with the lack of specific plans in relation to healthcare provision in the area given the extent of the proposed developments. Sites LP26, LP177, LP953 and LP1625 are in very close proximity and as such my comments are to be considered for all these sites given their cumulative impact on the local area. Rather conveniently, in their evidence submissions, Calderdale council have chosen to disguise the disproportionate development in the Greetland area by combining it with areas where there is less significant development planned. (Elland, Stainland and Holywell Green). The quoted figure of 8.21% growth in the number of dwellings cannot be used as a reference when considering the effect on the local infrastructure. The Calderdale Review of Polling Districts in 2019 states that there are 1726 dwellings in the Greetland and Sunnybank wards. The above named development propose 543 new dwellings in these wards giving a staggering percentage increase of 31.4%. This clearly represents a disproportionate increase in the area. Report CC37 details a previously proposed development site which was considered and rejected in neighbouring Barkisland due to a "disproportionate increase to Barkisland village". This represented a 16.6% growth in dwellings. Questions must be asked about the boundaries used by Calderdale Council when calculating their growth percentage in Greetland. As a healthcare professional working in primary care in Calderdale I have significant concerns with the clear lack of infrastructure planning in the local plan generally, especially in relation to healthcare provision. The -“Health and Wellbeing Infrastructure Supporting Paper” submitted as evidence is somewhat inadequate as reassurance that there is any meaningful plan to address the concerns of the local community in relation to healthcare access given the disproportionate increase in population planned. This is summarised well in its conclusion: -“The Local Plan has been prepared at a time of significant change to the delivery of health and social care. These changes are yet to embed themselves and as such it is not possible at the present time to provide a finalised position on the physical health and wellbeing infrastructure that will need to be delivered...” This is not an adequate plan. This conclusion does not satisfy national policy nor NHS Policy statements: The National Planning Policy Framework specifically requires councils to -“take into account and support the delivery of local strategies to improve health, social and cultural wellbeing at the local plan stage.” (NPPF, 2019) -“Embedding well-evidenced health priorities into the local plan is a powerful way for the NHS and public health to empower planners to create healthier places.” (Putting Health into Place, NHS England 2019) Furthermore, rather worryingly there is no mention at all in the -“Health and Wellbeing Infrastructure Supporting Paper” about any plans regarding frontline NHS services not under the control of the CCG, specifically dentistry. The local NHS dental service is already oversubscribed and inadequate for the needs of the existing population. An NHS Choices search conducted in January 2020 showed no dental surgeries accepting new patients in a 10 mile radius of the proposed developments. There is no evidence of any consultation with local providers or NHS England in this regard. This is a missed opportunity to

identify a strategy to address inequalities in access to healthcare in our area. A 31.4% increase in dwellings in an area serviced by 1 dental practice would cause an access crisis with resulting impacts on the local GP surgery and A&E department. In conclusion. The percentage increase in dwellings has been misrepresented in the figures submitted. The potential impact of the true 31.4% increase in the area or Greetland would be catastrophic.

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

Duty to Co-operate Reason:

Suggested Modifications:

Remove site from local plan as unjustified development on Greenbelt land with no exceptional circumstances. Properly assess the impact of a 31.4% increase in dwellings in Greetland. Provide meaningful plans on healthcare provision for such a population increase.

Comments:

Additional Evidence Link:

Comment ID **HRU1449**

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

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?: **No**

Sound Reason:

Points of objection; 1. air pollution 2. flooding 3. infrastructure 4. wildlife 5. traffic congestion 1. Air pollution I currently use this route to walk my children to school. 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. This is not even considering the school and nursery school along the route, I have been unable to identify any assessment of air quality at the moment. I fear for the health of the children attending these school and travelling to an from these schools. 2. flooding The area in question has already been greatly effected by flooding, the latest only 2 weeks ago with raging water flowing through the proposed plot. This is considering the existing land is soil, a natural absorbant, imagine this being concrete and this running into black brook which already overflows during heavy rain. I am concerned that this would put surrounding areas, residents and business owners at risk in west vale. houses sitting adjacent to this site have already had their gardens flooded recently. The boxing day floods of 2015 proved devastating for this area so to consider building houses here and covering this beautiful area in concrete would be devastating. 3. Infrastructure 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 struggle to leave my cul de sac to get to work due to queuing traffic at peak times, traffic is at a standstill often and for long periods. 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?: **Yes**

Duty to Co-operate Reason:

The first notification I had of this was from fellow concerned residents. Notification was posted from our local MP very recently. As residents of Greetland I feel we have every right to be consulted as we are the very people that this will effect and I sincerely hope that our concerns are listened to.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1462**

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

Person ID: **1243998**

Name: **Mrs A Hemsworth**

Organisation:

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:

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 . What are the exceptional circumstances for building on this land ? You do not

provide any evidence! Flooding This site does NOT meet the National Policy with regard to flooding. The land to the south of Saddleworth road, provides an area for excess rainfall to settle, soak and drain away 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. This land is not suitable for housing due to the high water table and the fact that the lower part of the field is a flood plain and regularly floods from surface run off. We must let the water soak away naturally and NOT add to the already devastating floods experienced in Elland and further down the valley. Our weather systems are changing and what was once considered to be a 'once in a 100 year flooding event' is now happening every few years. Traffic; With over 600 houses proposed in total, there would be a potential 1200 extra cars on Saddleworth Road. There is already chronic congestion at the two (unavoidable) junctions in West Vale which causes traffic to back-up through the local villages of Greetland and Holywell Green and any extra traffic would cause massive tail backs; WSP Parsons Brinckerhoff Report on Transport Network states that: traffic congestion at the juncture of Stainland Road-Saddleworth Road would increase by approximately 105%, and that traffic congestion at the juncture of Stainland Road-Rochdale Road would increase by over 100%. Air Pollution - Unfortunately, cars are often queueing for the west vale traffic lights right outside the junior school on Saddleworth Road. This proposed development will cause considerably more pollution, allowing toxic air to compromise the health of vulnerable developing children, stunting lung growth and causing life-long health problems. The pollution caused will affect all the residents of our village, and surely this goes against the Calderdale Council's own Air Quality Action Plan and the West Yorkshire Low Emissions Strategy. Infrastructure; The infrastructure of the area cannot support the extra households for this site, never mind the 600 households if the whole of the proposed developments are approved. We have no extra capacity in the school; Calderdale council's own figures show that a further 206 school places would be required. The GP surgery could not cope with an extra 600 families, and the NHS dentist already has a waiting list. Ecology; This area serves as a green corridor between the villages of Greetland and Stainland, and has a well used public footpath which spans the whole length of the proposed sites. This green wildlife corridor hosts an abundance of flora and fauna such as bats, deer, foxes, squirrels, owls, kingfishers and much more. Black Brook is a clean natural brook with a population of wild brown trout. The proposed building works will affect the ecology of the valley by:- increasing air pollution, noise pollution, and artificial light pollution; and by creating overbearing buildings and oppressive human presence. Open Space; This amenity has many benefits; it is good for our mental and physical well-being, and the footpaths in this area are well used by families, dog-walkers, bird watchers etc. The Local Neighbourhood Plan Committee recently commissioned a report as part of their programme to preserve and retain Green Spaces for the Health and Wellbeing of all local people.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1472**

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

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 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 3 A 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. However, the land does routinely flood much further beyond this boundary, as shown in the photographic evidence attached to this objection. The plot in question has appeared on the regional news, multiple times, due to the way in which it floods. The land actually became waterlogged during the consultation period of the Local Plan. 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 three sites when putting together the Publication Draft version of the Local Plan in 2018 concluded that all three sites in Greetland should be filtered (i.e. not taken forward as housing allocations) because of ; amongst other things ; flooding and drainage issues. Sequential and exceptions tests would have been necessary to demonstrate that the sites were suitable for and safe to develop. Although the Planning Inspector identified an insufficient supply of housing land following the Stage 1 examination process, it should not simply follow that additional sites are now allocated without a thorough assessment being made as to their suitability to counter the reasons why they were initially filtered. The three sites seem to have been put forward as a simple response to the Inspector's comments with no consideration of the flooding and drainage issues associated with the land. Green Belt The Green Belt Review was carried out in 2017, the reference numbers are 065 and 339. The conclusion of this review was that 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 aspiration growth for Calderdale is achievable, as this would set an economically low achieving council as able to surpass the trends for economic growth seen nationally. There is no explanation for this. Calderdale will end up with a surplus of houses and a shortage of Green Belt land. Other Issues The site assessment reports carried out in advance of the 2018 Publication Draft identified other areas of policy conflict ; in particular heritage, open space and

sustainability. It was at that time recommended that none of the sites should be allocated until an assessment had been made of the heritage impact. To our knowledge that has not occurred, as we see no evidence of this in the site reports. The sites were identified as providing valuable natural and semi-natural open space. This would be lost if the sites were allocated for housing. The land is particularly important to the residents of Greetland, which can be seen in the photos attached of the pressure group protest walk. The public right of way is used by the vast majority of the local residents, and even Calderdale residents from further away. This public amenity is highly important for the purposes it serves within the community, and should not be taken away or made unsafe to use, just to fulfil an unsubstantiated housing requirement. In terms of sustainability, a negative factor in not bringing the sites forward in the 2018 consultation was the distance to a railway station (in excess of 2kms). By definition that negative factor remains and forms part of the reason why other potential sites in the area have not been brought forward (such as site LP1089 on Rochdale Road). There are other sites within Calderdale as a whole that better fit the criteria of sustainability. Not all of the possibilities have been sufficiently explored. Conclusion All of the reasons why these sites were not brought forward at the Publication Draft stage remain just as relevant now. There has been no further assessment of any of the significant constraints which resulted in the sites being filtered at that stage. The only reason for bringing them forward for allocation now is based on a simple exercise of responding to a requirement to increase the housing supply. The three sites would cumulatively deliver around 475 units, serving to address quite substantially the shortfall identified. However, 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:

Suggested Modifications:

Remove this land from the Local Plan, and reassess the housing requirement. Alternatively, consider less sensitive, lower riskland elsewhere 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: <http://calderdale-consult.objective.co.uk/file/5609801>

Comment ID **HRU1485**

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

Person ID: **1243945**

Name: **Miss Jody Littleley**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Calderdale Council have failed to adequately ensure that residents effected were made aware of the proposals. Residents have not received any communication from Calderdale Council regarding these plans.

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

Sound Reason:

The Green Belt land should be preserved at all costs and should not be built on unless there are exceptional circumstances. Calderdale Council have not provided any evidence of exceptional circumstances. They say they want to build affordable housing - there are plenty of empty houses across Calderdale (how about these are filled first before thinking about building anymore), they are also plenty of non green belt sites that can be built on so build on those! The CPRE state "The development of brown fields sites should be a priority; there are more than enough brown field sites to fulfil the requirement without having to encroach onto Green Belt". This is not sustainable - there is not enough infrastructure to support the existing residents. Doctors surgeries, schools, dentists etc. are all full to capacity. The roads are incredibly busy - the traffic trying to get into West Vale via Rochdale Road, Saddleworth Road and Stainland Road is atrocious especially at peak times. The roads simply cannot cope with anymore cars. These roads turn into car parks with traffic in West Vale back upped by Greetland Academy on Saddleworth road. I'd urge you to travel on these roads at peak times to understand how bad the situation is now and think about how an extra 1000cars would create a huge negative impact on this. This site in the existing Green Belt should be removed from the Plan as the exceptional circumstances for its release do not exist. Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: (i) to check the unrestricted sprawl of large built-up areas (ii) to prevent neighbouring towns merging into one another (iii) to assist in safeguarding the countryside from encroachment (iv) to preserve the setting and special character of historic towns (v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. It does not conform to Central Government Policy; it does not conform with current legislation with regard to building on flood risk areas. If you build on the Green Belt you are endangering lives by taking away the much needed natural flood defence which soaks up a lot of rain water. If this land is built on it will have a catastrophic impact on the flooding that already exists. On the 9th of February this proposed site was completely flooded. I dread to think what will happen if this land is built upon. If you build on the Green Belt you are endangering people's lives, you can't mitigate that. A poor woman in Wales lost her life due to the floods, it seems like Calderdale Council are not concerned about the welfare of the residents and are quite happy to endanger their lives if it means they get money from developers. If you take away the Green Belt you will take away the habitat of the wildlife. Where are they supposed to go? The Green Belt is supposed to help protect our wildlife and sustain our ecosystem. The proposed development of the Green Belt will increase the noise and air pollution levels. Calderdale Council recognises that climate change is a huge issue but are actively wanting to add to the problem. Where is the evidence from Calderdale Council to prove that this plan is justified?

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

Duty to Co-operate Reason:

See above.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1491**

Site ref (if applicable):

Person ID: **1244004**

Name: **Ms Victoria Myers**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

It is not protecting green belt land and ensuring brown field sites are developed first. Out of date information, figures need revisiting post brexit and economic growth forecasts, and specific for the local are not based on Leeds. I do not believe this plan complies with the National Planning Policy Framework, in particular section 13. Protecting Green Belt Land A strategic attempt has been made to divide opposition of sites within Greetland, therefore my comments and objections are the SAME for all 4 sites proposed for development, as essentially they are all facing the SAME constraints and will have the SAME detrimental impact on the locality, for reasons I shall state below.

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

Sound Reason:

The infrastructure, in respect transport, highways, education, and medical needs are totally inadequate for any development proposed of this scale. Because there are many other areas including Brownfield sites within Calderdale which have not been considered for inclusion in the in the Local Plan, it smacks of discrimination. Complete disproportionate amount of building proposed for in this area. The revisions to the local plan (when the 4 sites off saddleworth road were added, AFTER the plan was agreed and supported by local councillors) proves further unsustainable development with a disproportionate amount of new homes proposed across four sites in Greetland with over 60% proposed in the Elland area. I might also add that it is evident and has not gone unnoticed of the massive proposal to build in non Labour majority wards. The biggest area for concern is the flooding - not a flood risk as we have seen in 2015 and most recently only in February 2020 the areas are flood plains. Natural springs, even streets and lanes are named after them for a reason! It is not rocket science to get the link between the steep sided hills all around Greetland, surface water will and does pour down the roads and these green field sites do their job to help limit the flood effects, protecting the nearby houses and when the Black Brook can cope, off it goes into the river and on to West Vale, Elland, Brighouse..... If this water has nowhere to go it will have serious detrimental effects not only to the people living in existing and new houses but the wider areas mentioned above as they will flood even worse and more frequently, as a risk to life and certainly detrimental impact to highways and bridges and people being able to get about to do their jobs. The further addition of possibly 1200 cars (2 per household) will increase air pollution and the proximity to the local infant school will have health effects on the children, when we're already facing an unprecedented increase in childhood asthma. The plan was based on housing Requirement to support the economic growth plan. This country has just seen its biggest change in 47 years, Brexit! The plans are not current and not compliant. Economic growth should be called for review! The housing need was calculated in 2016 which will be significantly reduced in Brexit Britain! Wildlife corridor - Currently the valley enjoys the presence of; deer, herons, squirrels, foxes, and other wildlife to the benefit of residents. Final point, The Council should consider increasing the density in the Brighouse building sites, and the CPRE has made this suggestion.

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

Duty to Co-operate Reason:

I have found that Calderdale's publicity surrounding these proposals to have been somewhat limited, and lacking in ensuring complete openness, and robust attempts at consultation with the community. I found it underhand that the local plan was set and agreed and voted on in council in 2018 and then somehow these 4 sites, a not insignificant 600 houses were added in - on a technicality that Councillors agreed to allow small changes without a revote (simplified wording). Is there been any evidence of cross boundary cooperation in meeting the housing needs??

Suggested Modifications:

Brownfield sites MUST be exhausted first before developing on more green belt land and creating urban sprawl

Comments:

Additional Evidence Link:

Comment ID **HRU1496**

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 a flood zone. It is already devastating to see this land regularly flooded after short periods of heavy rainfall, which threatens adjacent homes and undoubtedly impacts further downstream in West Vale and Elland Bridge, a bridge which partially collapsed in the floods of 2015, costing £5 million to rebuild and this closed a vital traffic route for almost 2 years . The ludicrous plans to build on this land absolutely beggars belief on this point 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 pollution from the current levels of traffic along Saddleworth Road is already considerable and this, and air pollution, would increase dramatically if these plans go ahead. The young children attending the primary school alongside this road would bear the brunt of this air pollution . This land is an integral part of the community at Greetland . The walks alongside the small river is very popular with families and walkers. 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 **HRU1497**

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

Person ID: **1243914**

Name: **Mr James Travis**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

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 currently tests compliance with the T&CP Regs 2012 Sec 18 / 19.

Do you consider the plan to be Sound?:

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 Greetland Corridor sites 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 would now be selected and be more deliverable with a footprint that is dispersed across the CLP with a lower impact to Green Belt with less uncertainty relative to site appraisal assessments. 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 larger non-local companies). 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. As commentary demonstrates this site performs very well against GB objectives.

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 that Leeds City Region Statement of Common Ground August 2018 has 6 signatures missing.

Suggested Modifications:

Removal of this site is politely requested

Comments:

Additional Evidence Link:

Comment ID **HRU15**

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

Person ID: **955050**

Name: **Mr Thomas Connor**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

Impact of local plan on Greetland and Stainland ward Ref Plot LP0177 Critical Flood Plan in use (1) Ref Plot LP0177 Critical Flood Plan in use (2) RESPONSE TO AMENDED CALDERDALE PROPOSED LOCAL PLAN SITES IN GREETLAND Main points of Objection: 1. Loss of large area of Green Belt and Wildlife Corridor 2. Current Chronic Congestion in West Vale, Greetland 3. Impact on current Road Layout of Local Villages 4. Lack of Infrastructure 5. Creation of Urban Sprawl 6. Impact on Air Quality 7. Flooding Risk 8. Sites Recommended having Negative Assessments 9. Failure to plan the "Right Homes in the Right Places" 10. The possible Creation of Homes for "Incomers" 11. Area with no Sites available for Planned Local Employment 12. Additional flooding in areas such as Elland. 1. Loss of large area of Green Belt and Wildlife Corridor There is a necessity for the Local Plan to address the implications of the NEW section and specifically Para 177 of the National Planning Policy Framework (NPPF) and the associated PPG in the Sustainability of Greenbelt Sites The Green Belt that separates the two main areas of the Greetland and Stainland Ward is made up of two hillsides. One side of the hill is home to a Golf Club and Black Brook runs along the valley bottom. This Wildlife Corridor has a well-used public footpath that travels the whole length of the proposed Local Plan build site. This area is home to wild deer, foxes, squirrels, field mice, barn owls, kingfisher and much more. The brook itself is a healthy natural water-course with a thriving population of wild brown trout. (The result of a recently commissioned survey by Dr Paul Gaskell of the Wild Trout Trust). The Local Neighbourhood Plan Committee commissioned this as just a part of their programme to preserve and

retain Green Spaces for the Health and Wellbeing of all local people. A recent application to the Woodland Trust has secured the donation of 105 x indigenous trees specifically recommended for an area such as this. Furthermore, as the horse chestnut is at risk, a programme of replacement is also being arranged. See ** under Flooding Risk para 7. A wild flower meadow is also in the planning stage. This work is in conjunction with a local large employer who is supporting and has donated to the scheme. Please note: every mature tree supports over 100 species of animals, birds and insects. The grid reference of this locality indicates that proposed housing fences could block sunlight from the footpath and brook. Extract from Defra 25 year Environment Plan: "We will protect ancient woodlands and grasslands, high flood risk areas and our best agricultural land. Protect Green Belt to make this land a "breathing space" for our urban populations to enjoy and our diverse wildlife to flourish". A Senior Planning Officer stated recently at a Local Plan Meeting: "We have saved much Green Belt". The rebuttal to this is that the Authority have proposed to build on even more Green Belt in Greetland than on the previous Proposed Local Plan. A report recently submitted to the Adult Health & Social Care Scrutiny Board stating the need to retain Green Spaces for the Health and Wellbeing of Calderdale residents. This report was submitted by the Head of Planning. (This report is on Calderdale MBC's Website) 2. Current Chronic Congestion in West Vale, Greetland The Current Chronic Congestion in West Vale will not be remedied by, as was stated by a Calderdale Senior Officer this recently, "adjustment to West Vale traffic lights". Look what fun the current temporary traffic lights are causing, Furthermore, a comment made recently at a the Local Plan Meeting stating that "We will ensure that there are bus stops near any new developments" is not going to improve the situation to any great degree. I do not believe that major improvements to the A629 will have the impact anticipated, as this is a distance away from the immediate locality. A planned station at Elland will not alleviate any of this congestion either, as more proposed build will mean more people trying to access a station. Traffic from a wider area will have to come through West Vale to access the new fly-over to join the A629 Elland by-pass to reach a station. Therefore, proposed large-scale building on Saddleworth Road will cause huge problems for residents not only from our Ward but for adjoining areas. WSP Parsons Brinckerhoff Report on Transport Network states that: "¢ This report identifies that traffic congestion at the juncture 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% However, the WSP PB Report seemingly fails to identify the output from Stainland Road-Saddleworth Road junction feeds as an input to Rochdale Road junction. 3. Impact of current Road layout on Local Villages Traffic congestion is at a chronic level in the Greetland & Stainland Ward already and we must take into consideration that our surrounding areas have narrow roads, many with no other choice but to park on the roadside and we simply cannot satisfactorily support any further traffic. The M62 is not so easily accessible to the area. There are seven existing large companies in the immediate area with Lorries that rely on the motorway - currently at saturation point. 4. Lack of Infrastructure Local Schools are full - both Greetland Academy and Brooksbank, Elland. The current proposed plans are not clear enough to show if there would be any space left to extend Saddleworth Road School. A more sensible approach would be to extend Saddleworth Road Academy and demolish the Academy at School Street, Greetland and use this site to build homes. Integrating the school would alleviate some morning traffic and would be more convenient for parents/guardians currently having to access both schools. With a proposed 600 houses, using Calderdale MBC's figure for school places of .36 per household (IDP section 9.14) this indicates another 206 places would be needed. Local Dentist has a waiting list of 600 for NHS places. The nearest NHS dentist was recently found (July 2019) 11 miles away in Kirklees. The GP Surgery would be strained to take this proposed capacity. There would also be a further strain on local Hospitals 5. Creation of Urban Sprawl Large open spaces are needed for the mental and physical health and wellbeing of all. Urban Sprawl has many negative consequences for residents and the environment, such as higher water and air and noise pollution, increased traffic fatalities and congestion and increased car dependency. Should we move towards sustainable cities and protect urban growth boundaries and develop buffer zones in Green Belt areas? There is much more widely available information on the Internet regarding this subject and the negative effects of Urban Sprawl. 6. Impact on Air Quality This speaks for itself. This is why

there is a need to plant more trees in the Ward. This will be negated by the building of some many houses. The current air quality needs to be assessed.

7. Flooding Risk In recent months when the rainfall has been intense:- On Saddleworth Road, Greetland, water has been oozing out of cracks in the middle of the road. Five properties have reported flooding within the curtilage of their properties. If there is a freeze, black ice is prevalent in the area. The hillside in question is known locally to be historically awash with springs, wells and gullies that divert water into the valley bottom. The latest Local Plan proposes 600 x houses on the land below Saddleworth Road. This land currently soaks-up rain run-off. A current planning application for the centre of West Vale indicates that the Environment Agency assesses that part of the site is at risk of flooding. Please note that the Sites on this new amended Local Plan are also positioned at approximately the same level.

Water & forest Services: A healthy 100-foot-tall tree has about 200,000 leaves. A tree this size can take 11,000 gallons of water from the soil and release it into the air again, as oxygen and water vapour, in a single growing season.

8. Site Assessments on New Proposed Plan LP0952: Of the 17 Sustainability Assessments this allocation has 11 x Uncertain Assessments and 2 x Negative Assessments LP0177: Of the 17 x Sustainability Assessments this allocation has 9 x Uncertain Assessments and 4 x Negative Assessments. This Site has also recently been Refused Planning Permission (5 July 2019). At Call-in this was also refused by the Planning Committee. CMBC Comments: "The site 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 Section 13 (Protecting Green Belt Land)"

LP1625: No Sustainability Assessments LP0026: Of the 17 x Sustainability Assessments, this allocation has 10 x Uncertain Assessments and 1 x Negative Assessment We should therefore consider two further sites as replacements:

1. Village Brownfield Site
2. A further alternative but less sensitive Site in order to protect this Wildlife Corridor

9. Failure to Build the "Right Homes in the Right Places" The Local Plan should be focussed on building the "Right Homes in the Right Places". I agree there should be more affordable homes for families and people living alone. Sites for new homes should be considered nearer West Vale village setting with all amenities within walking distance. There should be more Independent Living Accommodation with Care on Site planned for our increasing Older Population. This will free-up family homes in the area of those wishing to down-size and perhaps requiring extra care and support. There are not enough suitable places in Homes with Care in our area.

10. The Possible Creation of Homes for Incomers It has been suggested recently that to support the need for "Economic Growth", we will need to build more housing for "incomers". These people will then possibly commute to their places of work outside our Ward and a wider area. (This suggested need for Economic Growth is the reason for this amended new Calderdale Local Plan) Plans from large developers for housing on the Saddleworth Road proposals have already been drawn-up.

11. Area with no Sites available for Planned Local Employment There are no areas within Greetland & Stainland Ward available for a Business Park or Industrial Site. Therefore, this will mean more people commuting to their places of work. Current Business Development in the Area: A local employer of over 200 people is now investing in a 10 million pound expansion programme. This is to automate their production line. They state that they will not require any further additions to their workforce. There is a message here that "Economic Growth" will come from productivity not workforce led.

12. Greater Flood Damage to Elland and Surrounding areas. Covering over this (LP0177) critical flood area with hard surfaces will mean the water will run off faster and have to go somewhere else. Mitigation does not usually work due to costs, poor design and poor maintenance. Future Floods would be far greater than in 2015 without this critical flood plan. I strongly feel people in the adjacent areas are unaware of how badly this loss would affect them, both in damage to property and emotional distress. THEREFORE I FEEL THAT THE CURRENT AMENDED PROPOSED CALDERDALE LOCAL PLAN FOR THE GREETLAND & STAINLAND WARD IS NOT FIT FOR PURPOSE

Ref Plot LP0177 Critical Flood Plan in use (3)

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/5579011>

Comment ID **HRU151**

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

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 **HRU1511**

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

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 acknowledgement of concerns by local population Disregard to National guidelines of building on flood plains and Green Belt Agenda

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

Sound Reason:

The local Green Belt area sustains an healthy environment for the wellbeing of local population of all ages through open spaces for walking running cycling and local wildlife Increasing the amount of traffic through the area will be detrimental to health both physical and mentally if this developement is permitted Local schools Drs surgeries Dentists and Hospital are ill equipped to manage the high volume of new residents The road structure through West Vale Greetland Barkisland and Stainland already struggling to cope with volume of traffic and even an improved infrastructure would not address this as area is feeder area for M62 and this already causes problems when junctions closed I feel the majority of proposed home owners to this developement would be commuters on M62 corridor and subsequently contribute to poor air quality

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

Duty to Co-operate Reason:

The Local Plan disregards local populations concerns

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1534**

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

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 1. Increased chances of flooding Building on this site which has watercourses and springs ...not good for a new development and not good for any existing properties below or next to the site when the springs are diverted elsewhere by the developers The extra pressure this run off will have on Black Brook ,surrounding flood plains and homes will be devastating. On Sunday 16th of February a protest walk was held by members of the community...Starting at the school down to Black Brook (where last week you would have needed a boat.....the fields were totally flooded) ,up Gatehead Lane and back down Saddleworth Road to the school taking in all of the proposed sites, Site number LP0026 ,Site number LP0177 ,Site number LP0952 ,Site number LP1625 .They will have seen the expanse of run off into Black Brook as they had to negotiate their way through it to get to Gatehead Lane. To build on this site could have catastrophic effects for homes and businesses already in this area and further afield. It just doesn't make sense. Climate change isn't going to go away but we can try to slow down the effect by not creating more problems. Do we want this beautiful valley to become another flood disaster, where people who lose everything are expected to just pick up the pieces and carry on with everyday life as if nothing has happened.The effect on a person's longterm mental health and wellbeing must be huge .Don't build on these sites, surely Prevention is better than Cure and and less expensive in the long run .If these developments were to go ahead who would be accountable when problems start arising Calderdale Council ??? Developers ? ? ?? Or will they just take their ££££££££££ and run. Does anyone actually care? Can we have answers please ? The DEFRA 25year plan states that "National flood management involves the use of a variety of measures including storing water on open land". NPPF 14 (157b) states that plans should work to safeguard land from development that is required or likely to be required for current and future flood management. The current policy and legislation on flooding states -“due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere. Chapter 14, paragraph 163 of the NPPF states: -“When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Boris Johnson has thrown housebuilding plans into confusion, by suddenly calling for an end to construction on flood plains. Around 9 per cent of new homes in England are built on land where there is a -“high probability” of flooding ; and a recent investigation found that 10,000 are

currently in the pipeline. On the campaign trail in flood-hit Derbyshire, the prime minister said: -“We've got to stop building on flood plains. We've got to stop building on areas which are vulnerable to flooding. Calderdale Council Planning Department has a duty of care to comply with current policy and legislation on flooding. Housing should not be built on sites such as this. Now is the time to step up ,stop building on flood plains and learn by past mistakes . Stop putting lives at risk. 2. Loss of Greenbelt , open spaces and Urban Sprawl The purpose of Green Belt policy is 'to prevent urban sprawl' and 'to prevent neighbouring towns merging into one another.' The location of this proposed site would go against that ; there would be less clear boundaries between Greetland and Barkisland NPPF Section 13 Protecting Green Belt Land Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: 1) to check the unrestricted sprawl of large built-up areas (2) to prevent neighbouring towns merging into one another (3) to assist in safeguarding the countryside from encroachment (4) to preserve the setting and special character of historic towns (5) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Calderdale Council, in its own evidence, concludes that this area of Green Belt performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt Brownfield sites should be developed first and sites with better infrastructure links. Avoid development upon flood plains. We are compounding the existing risk by continuing to build on flood plains. The more we pave over natural areas the easier it is for water to move across the land and into the rivers. Why have Brownfield sites been overlooked ? Planning framework states that sites to be removed from greenbelt should only be done so in exceptional circumstances. What are the exceptional circumstances ?.....I can't see any . The proposed development represents a disproportionate amount of new development in Greetland . Now is the time to step up, stop building on Green Belt such as this (which helps store water and protects land below thus helping in the prevention of rivers flooding) and learn by past mistakes. 3. Increased Traffic congestion and air pollution The area has not got the infrastructure to cope with anymore traffic . West Vale is a bottleneck at the best of times . Saddleworth Road , Rochdale Road , Stainland Road are usually at a standstill. We've had 4/5 way traffic lights for weeks making the congestion worse than ever. Building these planned sites would be madness. It will be easier to go to Oldham shopping etc rather than sit in traffic trying to get to Halifax. Saddleworth Road has had a lot of roadworks recently , is this work that needed doing or is it paving the way for plans which haven't been passed yet? 600 new homes ...1200 plus more cars. I quite often see young children (vulnerable members of society) walking to school either with parents or with the Walking Bus maybe in the hope of getting some fresh air and exercise. Walking past queues of traffic with engines running is not a good way to achieve that. Even at school and pre school in the playground children are at risk from air pollution .1200 plus more cars to add to the queues of traffic that line up outside the school on a daily basis. Air pollution causes heart problems /lung problems and others, is this what we should be doing to our children/grandchildren . A little further down Saddleworth Road is an old people's home...Woodfield Grange (more vulnerable members of society) Not to mention those with existing problems ...more strain on the NHS. 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 before it's too late for all of us

.

Suggested Modifications:

LP0177...LP0952..LP0026.. LP1625 Don't build on these flood sensitive sites leave them as Green

Comments:

Additional Evidence Link:

Comment ID **HRU1544**

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

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 February 2020 alone). Building on these four plots in the bottom of the valley would not provide this vital wash land and would contribute greatly to more serious flooding to our area which has seen extensive devastation through West Vale, Elland, Sowerby Bridge, Mytholmroyd and Hebden Bridge to name only a few towns/villages in Calderdale that have been affected. In addition to the significant flooding certainty which has already been causing problems to local residents without the 600 additional houses being built, I have serious concerns for the lack of suitable infrastructure to deal with such a build. It can be safely assumed that each new house will come with at least one, if not two or three vehicles per household. There are two roads running through Greetland, both of which are significantly congested causing queuing traffic past the school and pre-school on occasion through rush hour traffic. As well as

Saddleworth Road and Rochdale Road being the main routes into the larger towns and to the motorways for commuters from Greetland, they are also the sole routes for residents from surrounding villages of Barkisland, Norland and Krumlin and as such, a further 600-1500 cars on this road will cause increased traffic congestion and pollution which is of additional concern as this will be next to the schools and pre-schools where our children play out and breath in these toxic vehicle fumes. I understand that the sewerage system which also running parallel to the brook is already full to capacity and at times overflowing in to the brook. How will a further 600 houses impact upon this system - I believe the answer is that it will be unable to cope and subsequently flow into the brook further polluting the water and causing damage to wildlife in the local area. I have already mentioned the school. Greetland Academy is at full capacity and oversubscribed most (if not every) year(s). I am aware that there is no capacity to extend the school therefore the proposed housing development will further put pressure on school places and expect further commuting to schools further afield for Greetland residents, further adding to the traffic congestion and pollution already mentioned.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1548**

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

Person ID: **1244121**

Name: **Mrs Anna Sladdin**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

From my understanding from NPPF Paragraph 143 only in 'very exceptional circumstances' may permission be given to build upon green belt land and also once all brown field sites have been exhausted. I do not believe that the council have exhausted the search for brown field sites in Calderdale and as such it would be unjust to see the Greetland green belt as suitable for building in this case. This green belt area in Greetland is also preventing 'urban sprawl' which is vital for villages to maintain their boundaries and have open green space which the Government continue to promote and cite as beneficial to communities for physical and mental health and well being. Furthermore although desirable to a developer due to location, outlook and affluent area, the four sites proposed in the Greetland (LP0177, LP0952, LP1625 and LP0026) area are not suitable for the amount of housing development proposed for a number of reasons. Greetland is a village built in a hillside with a brook running through the bottom. The majority of the green belt land for consideration is on the edge of this brook - a brook that is more and more often flooding due to increased surface run off from the hillside which is already predominantly built upon. As it stands, the

areas marked as green belt land at the side of Saddleworth Road in Greetland is just about managing to absorb all the surface run off water from the tarmac and overflowing springs in the local area on 'regular weather days' but over recent weeks there has been more examples of extensive flooding to all four of these sites as a result of what once could have been termed 'freak weather conditions' but as climate change is upon on us, these instances are more common occurrence (as demonstrated by Storm Ciara and Storm Dennis in 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?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1552**

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

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/5610117>

Comment ID **HRU1560**

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

Person ID: **1243885**

Name: **mrs victoria travis**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

I do not consider the plan to be sound for the following reasons; Greenbelt NPPR states greenbelt development should demonstrate exceptional circumstances. The site assessment report and sustainability appraisal report does not demonstrate any exceptional circumstances. Brown field sites 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 form part of the Leeds City region approach. 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 The fields have valuable use as a water storage area, reducing surface run off and increasing lag time to water courses. Development would result in flooding issues further down the water course. There has been wide flooding of this site during storm Clara, development of this site would greatly increase the risk of flooding in the local area and into Elland and beyond. The flooding has being seen in the local news programs. The environment agency flooding map, shows this site as high 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, "ç This report identifies that traffic congestion at the junction of Stainland Road-Saddleworth Road would increase by approximately 105% "ç This report also identifies that traffic congestion at the juncture of Stainland Road-Rochdale Road

would increase by over 100% 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, Wildlife This is a wildlife corridor to develop in the area would seriously hard the wildlife corridor. Sustainability appraisal report Firstly it should only be a positive or a negative outcome. Uncertain in the case of LP0177 generally mean negative "In terms of Sustainability Assessment 9 and protecting and enhancing bio and geodiversity the impact is uncertain as although the site is in excess of 800m from a SSSI and a LWS, it is within the Wildlife Habitat Network and is within the 7km buffer zone of the SPA /SAC. In addition, the site is within an area where priority habitats are at a medium vulnerability to Climate Change impacts." It is clearly a negative impact building next to a Wildlife Habitat Network, the impact is not uncertain. There are 9 uncertain outcomes on the sustainability assessment out of 17, therefor the sustainability appraisal report is of no use. Site assessment reports Accessibility An error in the site assessment summary is journey time to Town 15 minutes. This is backed up in the site assessment reports, journey time to hospital 30 to 60 minutes. The hospital is located on the journey to Town before the Town centre in reached. Therefore the journey time to town is 30-60 mins too. The site is located more than 2km from the train station.

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

Duty to Co-operate Reason:

Suggested Modifications:

Remove site LP0177 from the local plan.

Comments:

Additional Evidence Link:

Comment ID **HRU1571**

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

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/5610145>

Comment ID **HRU1584**

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

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 8th and Sunday 9th 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 30th January 2020 highlighted Calderdale Council's 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 imagine what the area would be like with so many more vehicles. **LOCAL INFRASTRUCTURE** Another major concern is the local services which support the area, such as the doctor's surgeries and Greetland Primary School. Only recently I visited my midwife and was asked to book a blood test at the surgery within 2 weeks of the appointment, but the surgery didn't have an appointment for 5 weeks! Resulting in a trip to the local hospital so this could be done within the required timescales. It's difficult to envisage how the

area could cope with so many more residents, all requiring access at some point to these services in the local area. It's clear to see from the number of people objecting to these plans just how important the greenbelt is to the local community. So many people are passionate about saving this and it seems ridiculous to even be considering greenbelt sites when there are so many brownfield sites which could and should be considered first. Once our greenbelt is developed and built on it is gone forever and we need to protect areas like this, which offers habitats to wildlife and help to avoid potentially devastating flooding.

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

Duty to Co-operate Reason:

The council have made no effort to advise us of the proposed development of this site, we have received nothing through the post, via email or seen anything in the local area.

Suggested Modifications:

I would suggest removing this site from the Local Plan.

Comments:

Additional Evidence Link:

Comment ID **HRU1586**

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

Person ID: **1244117** Name: **Mrs Linda Littley** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

see reasons below

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

Sound Reason:

see reasons below

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

Duty to Co-operate Reason:

Greetland has been banded with Elland and Stainland. This is ridiculous and is not a true representation of the situation or the area . Why is this development LP0952, LP0026, LP0177, LP1625,even in the Local Plan when Brownfield sites are available (but been removed) I think that the local community and beyond have been greatly let down by the Council regarding the lack of information they have provided . Surely, every household in Greetland should have had information by post about these plans as the plans for all sites will affect everybody in Greetland ,surrounding areas and other areas in some some way .It is then up to them to object /not object as the case may be .I believe Calderdale Council has not given ALL the community the chance to air their views. I myself would not have known of this plan had it not been brought to my attention by a group on Facebook. I OBJECT to all the sites LP0952, LP0026, LP0177, LP1625 being part of

the Local Plan for the following reasons 1. Increased chances of Flooding 2 Loss of Greenbelt , open spaces and Urban Sprawl 3. Increased levels of air pollution 4.Schools , Doctors,Dentists 5. Loss of wildlife and habitat Building on this site which has watercourses and springs ...not good for a new development and not good for any existing properties below or next to the site when the springs are diverted elsewhere by the developers The extra pressure this run off will have on Black Brook ,surrounding flood plains and homes will be devastating. On Sunday 16th of February a protest walk was held by members of the community...Starting at the school down to Black Brook (where last week you would have needed a boat.....the fields were totally flooded) ,up Gatehead Lane and back down Saddleworth Road to the school taking in all of the proposed sites, Site number LP0026 ,Site number LP0177 ,Site number LP0952 ,Site number LP1625 .They will have seen the expanse of run off into Black Brook as they had to negotiate their way through it to get to Gatehead Lane. To build on this site could have catastrophic effects for homes and businesses already in this area and further afield. It just doesn't make sense. Climate change isn't going to go away but we can try to slow down the effect by not creating more problems. Do we want this beautiful valley to become another flood disaster, where people who lose everything are expected to just pick up the pieces and carry on with everyday life as if nothing has happened.The effect on a person's longterm mental health and wellbeing must be huge .Don't build on these sites, surely Prevention is better than Cure and and less expensive in the long run .If these developments were to go ahead who would be accountable when problems start arising Calderdale Council ??? Developers ? ? ?? Or will they just take their money 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 purpose of Green Belt policy is 'to prevent urban sprawl' and 'to prevent neighbouring towns merging into one another.' The location of this proposed site would go against that ; there would be less clear boundaries between Greetland and Barkisland NPPF Section 13 Protecting Green Belt Land Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: 1) to check the unrestricted sprawl of large built-up areas (2) to prevent neighbouring towns merging into one another (3) to assist in safeguarding the countryside from encroachment (4) to preserve the setting and special character of historic towns (5) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Calderdale Council, in its own evidence, concludes that this area of Green Belt performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt Brownfield sites should be developed first and sites with better infrastructure links. Avoid development upon flood plains. We are compounding the existing risk by continuing to build on flood plains.The more we pave over natural areas the easier it is for water to move across the land and into the rivers.Why have Brownfield sites been overlooked ? Planning framework states that sites to be removed from greenbelt should only be done so in exceptional circumstances.What are the exceptional circumstances ?.....I can't see any . The proposed

development represents a disproportionate amount of new development in Greetland . Now is the time to step up,stop building on Green Belt such as this (which helps store water and protects land below thus helping in the prevention of rivers flooding) and learn by past mistakes. 3. Increased Traffic congestion and air pollution The area has not got the infrastructure to cope with anymore traffic . West Vale is a bottleneck at the best of times .Saddleworth Road ,Rochdale Road ,Stainland Road are usually at a standstill. We've had 4/5 way traffic lights for weeks making the congestion worse than ever. Building these planned sites would be madness. It will be easier to go to Oldham shopping etc rather than sit in traffic trying to get to Halifax. Saddleworth Road has had a lot of roadworks recently ,is this work that needed doing or is it paving the way for plans which haven't been passed yet? 600 new homes ...1200 plus more cars. I quite often see young children (vulnerable members of society) walking to school either with parents or with the Walking Bus maybe in the hope of getting some fresh air and exercise. Walking past queues of traffic with engines running is not a good way to achieve that. Even at school and pre school in the playground children are at risk from air pollution .1200 plus more cars to add to the queues of traffic that line up outside the school on a daily basis. Air pollution causes heart problems /lung problems and others,is this what we should be doing to our children/grandchildren . A little further down Saddleworth Road is an old people's home...Woodfield Grange (vulnerable members of society) This is the introduction to the Calderdale AIR Quality Action Plan *The main reason for tackling poor air quality is to address its impact upon health and quality of life. Its effects are felt particularly by the most vulnerable members of society such as the very young ,the elderly and those already suffering from other health conditions.It is also damaging to the local economy. Poor air quality can result in loss of working days,reduced productivity,increased absenteeism from school and a drain on national health 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.

Suggested Modifications:

LP0952, LP0026, LP0177, LP1625 should be scrapped

Comments:

Additional Evidence Link:

Comment ID **HRU1589**

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

Person ID: **1243021**

Name: **Mrs Laura Palfrey**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

There has been no consultation regarding this plan before it was submitted to the inspector. The NPPF states that green belt land should only be built on in exceptional circumstances, the plans do not sure any

exceptional circumstances, especially when there is brownfield sites available through Calderdale.

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

Sound Reason:

Flooding This is a flood plain, recent floods have shown that the field stops the flood waters impacting homes and businesses. As Calderdale Council have declared a climate emergency this land should be revised as the risk of flooding will be greater in the future. The plan states that there is a risk of surface water flooding, recent storms have shown that there is a lot more than surface water in this area. Green belt Because this site is green belt there is a lot of wildlife that live in the site, where will this wildlife go? Air Pollution The amount of cars added to the area would increase substantially, this would cause more air pollution for Key stage 1 schools on Saddleworth Road, and West Vale primary school, where the playground already sits beside a busy road. Traffic There seems to be no planning for the additional traffic, there are not many routes in and out of Greetland and they are already very busy at key times. There is very limited public transport in the area. Doctors Surgery There is no plan to build a new doctors surgery, with so many houses the service will be very stretched. School Greetland Academy is already oversubscribed, class sizes are already at 60 children per year, if this is pushed up it would impact the education given. No plan for a new school has been issued to deal with the additional number of children to move into the area. Additional Commentary The plan has been split into several different areas, because of this the amount of new houses does not look as large, until all the areas are taken into account. This should be made clearer. It also makes objecting a lot harder for members of the public which should be an easy to follow process.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU16**

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

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:

National policy is clear that Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan (NPPF Â¶83). 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 NPPF sets out the aim of Green Belt policy which is -“to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.” (NPPF ¶79). Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: (i) to check the unrestricted sprawl of large built-up areas (ii) to prevent neighbouring towns merging into one another (iii) to assist in safeguarding the countryside from encroachment (iv) to preserve the setting and special character of historic towns (v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The Council, in its own evidence, concludes that the overall parcel within which the site is located performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt but, most decisively, would see the coalescence of Greetland and West Vale and the deterioration of the identity of both places undermining the Council's Settlement Hierarchy. Notwithstanding this, the quantum of housing proposed in and around the site (around 650 new homes with LP1625, LP0952 & LP0026) 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. Sin the existing Green Belt should be removed from the Plan as the exceptional circumstances for their release do not exist. This includes this site. Bradley Hall Farmhouse 35 metres to the south of this area is a Grade II Listed Building. As a statutory consultee Historic England quite rightly point out that there is a requirement in the 1990 Act that -“special regard” should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess. The Council have not undertaken this exercise. Notwithstanding the above, The High Court Judgment in the case of *Peter John Steer v (1) Secretary of State for Communities and Local Government, (2) Catesby Estates Limited and (3) Amber Valley Borough* [2017] EWHC 1456 (Admin) (“Steer”); and The Court of Appeal Judgment in the case of *Graham Williams v Powys County Council* [2017] EWCA Civ 427 (“Williams”) set the general approach to the issue of the setting of Listed Buildings, two interrelated questions arise in relation to both: i) whether a development site is within the setting of an asset, and ii) what degree of affect a proposed development is likely to have on the significance if the Heritage Asset. In *Steer*, the case summarises the guidance provided by the DCLG Planning Practice Guidance (“PPG”) and Historic England's 'The Setting of Heritage Assets - Historic Environment Good Practice Advice in Planning: 3' (“GPA 3”) It identifies, by reference to these documents, instances of non-visual attributes relevant to the question of an asset's setting. The case confirms, as a matter of legal principle, that a decision-maker, in determining whether a development site lies within the setting of a Heritage Asset, has to consider more than just the existence of a visual connection and should consider how the building is experienced, including matters such as historical, social and economic connections. In *Williams*, the question of whether or not the setting of a Listed Building (and by analogy any other heritage asset in the context of paragraph 132 of the NPPF) affected remains a matter of planning judgement for the decision-maker. Both inter-visibility and co-visibility may be relevant and should be considered. It is the case at this site that a large part of the significance of the Listed Building at Bradley Hall Farmhouse lies within its setting, and that from a historic, social and economic perspective, the proposed site forms a vital part of this setting. On that basis, it is the case that s66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 is engaged, regardless of whether the Council concludes a visual link exists or not if and when it undertakes the necessary assessment. The Council states that a -“Heritage Impact Assessment will be undertaken to assess the level of harm and potential mitigation measures which could be required” However, this has not been produced so it is not possible to provide any meaningful comments as part of this consultation. The affect on the setting of every relevant asset (where the visual relationship is more than remote or ephemeral) has not been considered. Part of the site is Flood Zone 3a and both a Sequential Test and Exception Test would be required to demonstrate that the site is physically capable of development. These

has not been undertaken and even in the event that the site met the Sequential Test the reasons in planning balance terms as to how the site would meet an Exception Test are not demonstrable. In conclusion, this site is designated as Green Belt with no exceptional circumstances for release, it is within the setting of a Listed Building and also in Flood Zone 3a. For the reasons set out above, I would be grateful if the Council could consider this up-to-date position and remove the site from the emerging plan accordingly.

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

Duty to Co-operate Reason:

Suggested Modifications:

Removing this site from the local plan and it remaining as part of the green belt.

Comments:

Additional Evidence Link:

Comment ID **HRU1601**

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

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:

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

Sound Reason:

Points of Objections Air Pollution Flooding Infrastructure Wildlife Traffic Congestion Loss of Public Space
1 Air Pollution The severe increase in traffic (potential for 1200 additional cars which could equate to 2400 journeys each day) down an already congested Saddleworth Road. Already in peak periods the traffic backs up Saddleworth Road for at least ¼ mile with engines running! No air quality assessment has been undertaken in this area so we don't even know the extent of air pollution before the proposed development. Greetland Academy has the playground for nursery children right at the side of the road ; goodness knows how the proposed development will impact on these vulnerable, very young children which goes against the Governments strategy on air quality. 2 Flooding The area concerned floods at least once a year in varying degrees ; the worst instances have been Boxing Day 2015 and recently 9 th February 2020, the development will have a significant detrimental impact on flooding. The run off into Black Brook will cause serious downstream effects, for example, the floods of 9 th February saw Greetland Cricket Club, Heath Rugby Club and Clayhouse Park all under water ; so it is hard to understand how any flood plan could mitigate against the risk of even more severe flooding in West Vale leading to major issues for all the businesses and residents. It is impossible to understand how the proposals in the local plan can be in any way aligned to the recent declaration by Calderdale Council of a climate emergency. These proposals will inevitably lead to a flooding emergency, probably not what the Council had in mind by its declaration. 3 Infrastructure The development has only one road in and out and all the residents would have to use their cars as the development is not on a regular bus route ; again going against Government Transport Policy.

Local schools are over subscribed meaning parents will have to use their cars to take children to schools out of the area. All doctors surgeries are currently full and one is soon to close again impacting on the two remaining local ones. Other developments in the area have been mainly 3 and 4 bedroom houses (not affordable housing for local people). This type of housing attracts commuters who typically work in Leeds or Manchester and will therefore have to travel to the motorway via West Vale or Ripponden neither which can cope with traffic as it is today! 4 Wildlife The local wildlife will be decimated by any further development particularly birdlife such as Herons, Kestrels, Kingfishers which are seen very regularly flying around the area. 5 Traffic Congestion It is already extremely difficult to pass through the traffic lights at West Vale and the development will only add to the congestion both in West Vale and also Ripponden. 6 Loss of Public Space The area concerned is a very valuable green space for people of all ages to enjoy daily and is extremely popular with walkers, runners, etc. It is a really tranquil spot where people can get away from the stresses of life. It is also within walking distance of the local community and therefore people do not have to drive to enjoy the countryside.

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

Duty to Co-operate Reason:

Suggested Modifications:

Green belt should be kept as green belt for everyone to enjoy.

Comments:

Additional Evidence Link:

Comment ID **HRU1621**

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

Person ID: **1244105**

Name: **Mr Richard Lambert**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The Local Plan does not address the implications of the National Planning Policy Framework, especially, NPPF Para 177 and the associated PPG in the Sustainability of Greenbelt Sites. According to the NPPF Para 143 under 'Proposals affecting the Green Belt' it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' The very special circumstances are non-existent in this site. The consultation process has been inadequate as no information has been provided directly to local residents. The council site is misleading describing the site as Elland and has been frequently unavailable during the consultation process. Reports in to already known flooding risks are absent from the documentation.

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

Sound Reason:

Flooding The site forms a flood plane which acts in two respects to alleviate river flooding downstream of the site and preventing surface water flooding above the site from underground streams and water courses on the hillside around the site. Building on this site will cause rapid run off non-permeable surfaces

contributing to flooding from West Vale to Mirfield. Properties on this section of Saddleworth Road back on to Brandy Hole Wood. The water level in surface pools and water courses in the wood have already been raised by minimal development by the building of extensions on the Road. I am concerned that large scale development will cause my property to flood from water from Spring Lane (I'll leave you to guess how it got that name!) which is unable to pass under the road due to the presence of extensive foundations on the site. Increased Traffic Already the junctions in West Vale are unable to cope with the volume of traffic. Queues at a number of times during the day stretch back to the school in on direction and almost to Elland Bridge in the other. This causes local drivers to use Sunnybank and Brian Royd Lane to access Rochdale Road, both of these options cause risk to pedestrians either in a residential area, or on a narrow road parts of which have no footpath. There is no coherent public transport plan. Lack of amenities. The Primary School is already over subscribed, it is split on two sites. Most children would be transported by car to the Rochdale Road Site causing congestion and increased pollution. There is no planning as to whether this school or the one in West Vale could increase their uptake. There appears no room for expansion on any site. The nearest Secondary School is Brooksbank and no child from this site would be eligible for free transport, again that is likely to lead to more car journeys, more congestion and more pollution. Local GP surgeries are already at capacity and there are continual problems with receiving a timely consultation. Uneven burden of development Although this site is described as Elland it is most clearly Greetland. My view is that this has been deliberately mis-described by Calderdale Council to conceal the fact that this area has been unfairly allocated a disproportionate amount of development in the Local Plan and that this is a political decision. Loss of green belt 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.' Insufficient assessment has been made of the use of Brownfield sites across the Council area. This site is a key open space satisfying all requirements of Green Belt as agreed by Calderdale Council itself. Loss of wildlife habitat The site and surrounding stream and woodland is a key habitat for a large number of species including bats, foxes, deer, birds including heron and woodpecker. Also the stream has stocks of fish and attracts a large variety of insects. The area also has a wide variety of plant species. This development through direct loss of habitat and indirect effects due to noise, light and atmospheric pollution will have catastrophic effects on these plants and animals

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

Duty to Co-operate Reason:

Insufficient detail has been provided to local residents or elected representatives. The portal is difficult to navigate and has been unavailable at parts of the consultation.

Suggested Modifications:

This site should be removed from the Local Plan until: All available brownfield sites have been assessed. A detailed modelling of the flood risk, not only downstream but also surface water flooding risk on the hillside above has been completed and shared with residents. A fairer distribution of development sites has been undertaken. A integrated transport and traffic plan is agreed for this area, including improvements to both junctions in West Vale. An assessment of the impact on local education provision is completed.

Comments:

Additional Evidence Link:

Comment ID **HRU1625**

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

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 described as 'greenfield' but should be Green Belt 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:

It is not positively prepared, justified, based on proportionate evidence or consistent with national policy. The Flood Risk has not been properly considered. The Calder Valley Catchment is a high flood risk and this site already floods in places. If this area cannot continue as a flood catchment the problems will occur further downstream. This month the Greetland Cricket Club, Bowling club, Rugby Club and Model Car Racing Circuit were all flooded. These are immediately downstream of this site. Sporting facilities in the Greetland area are the out of action for weeks. 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 new access roads and additional traffic will make this a lot worse. The nearby School will be surrounded by housing and new roads increasing pollution and destroying the habitat. Wildlife in the Green Belt and natural woodland will be unduly affected. Evidence from photographs; I attach below photos that illustrate this and maps from Environment Agency of flood risk areas earlier this month, almost all of which flooded. Part of site LP0177 taken on Sunday 9th February 2020 Flood Alert area on Sunday 9th February 2020 when almost all the shaded areas flooded. An almost identical warning was issued yesterday, Saturday 22nd February 2020. Severe flood warnings on Sunday 9th February when much of the red and orange shaded areas flooded causing widespread problems. The red areas are fed partly by water from this site, which needs to remain as it is to prevent flooding in future. Greetland Cricket Club and nearby area which flooded on Sunday 9th February and would be at risk of further flooding if this site is developed as it is the next point downstream were the brook floods, View from viaduct on Saddleworth Road showing Greetland Cricket Club and nearby area which flooded on Sunday 9th February

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5610180>

Comment ID **HRU1627**

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

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, LP0177 is listed as part of Elland, which it clearly isn't. This is misleading and means it is easy for the site to be overlooked by residents who otherwise would want to state their objection. The process is far from 'simple' and is certainly not making it 'easy to get involved.' (SCI 1.3) 2) In the words of Esther McVey, Housing Minister's written policy on Green Belt land: -“Of course one of the most important environmental safeguards we have is the Green Belt. And I want to be clear that our commitment to this is as strong as ever, with any changes only happening in exceptional circumstances ; protecting the Green Belt goes beyond protection against development”“In these circumstances, our Green Belt is not being protected. In the local plan, this site is being referred to as 'green field' when it is legally classed as 'green belt' and therefore should only be built on under exceptional circumstances and ' when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including :- making effective use of suitable brownfield sites.' (The Government White Paper -“Fixing our Broken Housing Market”“Parag 1.39) There are other suitable brownfield sites in the local area which could be used and therefore would mean the 'right houses were being built in the right places.'

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

Sound Reason:

Disproportionate amount of building in the Greetland area. As sites LP0026, LP0177, 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. 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 West Vale, Greetland and Barkisland and the distance from local amenities would become an issue. The infrastructure would not be able to cope with this huge increase - such an increase of traffic on one road, doctors places and school place. NPPF (para 94) also states: 'It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: 28 a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.' Greetland currently meets the needs of our community but not the needs of potentially 600 more families. 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 .' We should not be building on high risk flood areas, or in extremely close proximity to high risk flood areas in Calderdale. We are not like the rest of the country! We are a high risk flood area, within a high risk flood area! The news today (15/2/20) is full of stories of flooding in our area with the army currently in Calderdale trying to prevent a repeat of the devastation from Storm Ciara last weekend when this whole site flooded and residents of Woodfield Drive battled to try and stop their houses from flooding. If these fields (site LP0177) were covered in concrete, those houses WOULD have without doubt flooded as the extra volume of water would have nowhere else to go. Labour Council leader, Tim Swift, is urging the Government to grant Calderdale urgent assistance by recognising it as a 'Tier 1' authority getting extra funding support because it is one of a small number of areas of the country at "sustained risk" of flooding.' Not a flood risk as stated in the local plan but a flood certainty- an area which will flood repeatedly and has over the last 5 years. Additionally, the NPPF states that, ' due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere .' The council's housing targets are not area specific so houses do not need to be built in Greetland on Green Belt in high risk flood areas. Due to the topography of our area ; sloping grassland, the trees, the flat flood plains and underground springs, we are not at threat of it happening as we are already seeing localised flooding. Building houses on any of the flood plains mentioned in the local plan will only turn this into a catastrophic problem like other villages / towns in the Calder Valley are experiencing. Houses built in a high-risk flood area are not sustainable as the NPPF requires them to be. Millions of pounds are already being spent to aid flood prevention and there are numerous reports of houses /businesses not being able to get insurance due to risk of flooding. These are not the types of houses which Calderdale needs. This does not solve the housing crisis ; it just causes Calderdale more problems and costs more money. Conserving and enhancing the historic environment NPPF (para 187) 'predict the likelihood that currently unidentified heritage assets, particularly sites of historical and archaeological interest, will be discovered in the future.' Historical buildings on this site indicate that more could be found. If this site is covered in concrete the history of the area will be erased permanently. 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.'This plan certainly does not improve air quality which is a huge issue in such close proximity to young children attending pre-school and the local primary school. Habitats and biodiversity To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity. 56; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation. 57; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity. 175. When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts) This plan does not protect and definitely does not enhance the biodiversity and geodiversity of the local area.

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 **HRU1630**

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

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:

Your attention is drawn to the following. Para 133 of the NPPF (2019) where the essence of the Green Belt is described. The two essences are given as permanence and openness. Hence any piece of land designated Green Belt, however large or small, cannot be taken out of Green Belt status or it will have lost its permanence. Similarly it cannot be built upon or it would lose its openness. Para 136 states that, in constructing Local Plans, local authorities can alter Green Belt boundaries only in exceptional circumstances. Thus, should an exceptional circumstance be proven then the Local Authority may alter the boundaries of a Green Belt area. It should be noted that the operative word here is 'alter'. Now in which way can a Green Belt boundary be altered? To answer that question we must refer back to para 133. If the boundary were altered in such a way that it removed land from the Green Belt that would then contravene para 133 which determines the permanence of Green Belt. Thus the only boundary altering that may be done is the extension of an area of Green Belt by moving its boundary outward.

***** Mr Justice Jay in the Calverton Parish Council v Greater Nottingham Councils [2015] EWHC 1078 stated that :- -“it would be illogical, and circular, to conclude that the existence of an objectively assessed [housing] need could, without more, be sufficient to amount to -“exceptional circumstances” within the meaning of paragraph 83 of the NPPF (2012)” This judgement also applies in context of paragraph 136 NPPF (2019). R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404, Treacy, Underhill, Lindblom LJ -“The concept of -“openness” there 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 LP0177 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 200 dwellings gives a CIL contribution charge of Â£67,000. Given that the CIL legislation requires 15% to be allocated to the community for its agreed benefit then the amount realised (Â£56,950) 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 dwellings and using Calderdale M.B.C. education ratio of .35 per dwelling suggests school place requirement of 210 school places. This is untenable as only approximately 2 places are available at Greetland academy (Business Manager, Greetland Academy) in any one year usually due to families leaving the area. Notes: Former Car Lots on Queens Road, Pellon. This has sat derelict for years and is surely prime for re-development. Old Lane (Off Keighley Road) a Former Mill Building and land in excess of 8 acres which is prime for re development

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

Duty to Co-operate Reason:

There is a mandatory requirement that the preparation of the Local Plan should involve businesses in the area. This has not happened. Also that the original plan presented to the Inspector was placed before full Council of Councillors. This has not happened with this update and due to the material changes brought about has bypassed scrutiny of the representatives of the people of Calderdale.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1633**

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

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. Most of Greetlands residents found out about the LP on a recently formed 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:

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/5610187>

Comment ID **HRU1651**

Site ref (if applicable):

Person ID: **954522**

Name: **Mr David Lees**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Previous planning rejected and residents not notified of reintroduction on planning application.

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

Sound Reason:

GREEN BELT Government policy on protection for the Green Belt is set out in chapter 13 of the NPPF 2018 ,

which opens by stating that: The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. The NPPF 2018 thus reiterates Government policy and encourages the use of brownfield land in almost the same terms as the draft revised NPPF. On protecting the Green Belt, it urges LPAs to maximise the use of suitable brownfield sites before considering changes to Green Belt boundaries and sets out the conditions that must be fulfilled for - "exceptional circumstances" to exist, to justify such changes. These are not "Exceptional Circumstances" Is there a shortfall in the land supply? This application is not justified in terms of need. There will also be a detrimental impact on the residents living standards which the local authority is obliged to protect. BIODIVERSITY Green Corridors are vital for Biodiversity. Birds are used as an indicator of general biodiversity in many UK and European policy areas, based on extensive data on abundance and trends collected over the past 30 years or more. We have a number of raptors using this area for food and roosting needs plus the species that are more abundant within Green Belt land than the Comparator Areas include the familiar blackbird, robin and chaffinch, as well as several species of conservation concern, such as mistle thrush, song thrush and starling. POLLUTION During the past few decades, urban areas have experienced increasing environmental stress, notably in the form of poor air quality, excessive noise and traffic congestion. Climate change impact has also added more stress. Road traffic is considered as one of the most important sources of air and noise pollution with adverse effects on human health. With the introduction of the proposed planning we can expect an additional 600+ vehicles using the already gridlocked local 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 **HRU1656**

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

Person ID: **1244169** Name: **mr Giles Walker** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

It is in direct contravention of the councils own stated policy of building on green belt and land at risk of flooding

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

Sound Reason:

The very idea that the council can even consider building of any sort on this most sensitive and vulnerable land beggars belief. I have witnessed flooding here on numerous occasions and that the land itself during these occurrences is acting as a natural flood plain and thus helping slow the flow of excess water in the

brook heading east to west vale and beyond. DO NOT UNDERESTIMATE the value of this lands ability to hold back water.

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

Duty to Co-operate Reason:

I am concerned that this piece of land will be commercially ransacked in the name of profit at the expense of nature. Once its lost its gone forever. This green belt is at the very heart of Greetland and should stay that way. Please see attached objection document

Suggested Modifications:

total rejection is the only possible option here to the very idea of this plan.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5610211>

Comment ID **HRU1657**

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

Person ID: **1244166**

Name: **Mrs Elizabeth Lambert**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The Local Plan does not address the implications of the National Planning Policy Framework, especially, NPPF Para 177 and the associated PPG in the Sustainability of Greenbelt Sites. According to the NPPF Para 143 under 'Proposals affecting the Green Belt' it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' The very special circumstances are non existent in this site. The consultation process has been inadequate as no information has been provided directly to local residents. The council site is misleading describing the site as Elland and has been frequently unavailable during the consultation process. Reports in to already known flooding risks are absent from the documentation.

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

Sound Reason:

Flooding The site forms a flood plane which acts in two respects to alleviate river flooding downstream of the site and preventing surface water flooding from underground streams and water courses on the hillside around the site. Building on this site will cause rapid run off from non-permeable surfaces contributing to flooding from West Vale to Mirfield. Properties on this section of Saddleworth Road back on to Brandy Hole Wood. The water level in surface pools and water courses in the wood have already been raised by minimal development of the building of extensions on the Road and at Middle Elistones by the building of a previous development. I am concerned that large scale development will cause my property to flood from water which is unable to pass under the road due to the presence of extensive foundations on this site Increased Traffic Already the junctions in West Vale are unable to cope with the volume of traffic. Queues at a number of times during the day stretch back to the school in on direction and almost to Elland Bridge in the other. This causes local drivers to use Sunnybank and Brian Royd Lane to

access Rochdale Road, both of these options cause risk to pedestrians either in a residential area, or on a narrow road, parts of which have no footpath. Increased car usage and traffic idling in queues will cause increased air pollution. There is no coherent public transport and traffic plan. Lack of school spaces. The Primary School is already over subscribed, it is split on two sites. Most children would be transported by car to the Rochdale Road Site causing congestion and increased pollution. There is no planning as to whether this school or the one in West Vale could increase their uptake. There appears no room for expansion on any site. The nearest Secondary School is Brooksbank and no child from this site would be eligible for free transport, again that is likely to lead to more car journeys, more congestion and more pollution. Unfair burden of development Although this site is described as Elland it is most clearly Greetland. My view is that this has been deliberately mis-described by Calderdale Council to conceal the fact that this area has been unfairly allocated a disproportionate amount of development in the Local Plan. Loss of green belt 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.' Insufficient assessment has been made of the use of Brownfield sites across the Council area. This site is a key open space satisfying all requirements of Green Belt as agreed by Calderdale Council itself. Loss of wildlife habitat The site and surrounding stream and woodland is a key habitat for a large number of species including bats, foxes, deer, birds including heron and woodpecker. Also the stream has stocks of fish and attracts a large variety of insects. The area also has a wide variety of plant species. This development through direct loss of habitat and indirect effects due to noise, light and atmospheric pollution will have catastrophic effects on these plants and animals

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 communication with local residents and other interested parties. The portal is difficult to navigate and unreliable.

Suggested Modifications:

An open and honest assessment of housing needs across the entire council area needs to be undertaken. Firstly brownfield sites must be addressed and an even distribution of development put forward to meet identified need which can be delivered within the constraints of local infrastructure and amenity This site should be removed from the Local Plan until: All available brownfield sites have been assessed. A detailed modelling of the flood risk, not only downstream but also surface water flooding risk on the hillside above has been completed and shared with residents. A fairer distribution of development sites has been undertaken. A integrated transport and traffic plan is agreed for this area, including improvements to both junctions in West Vale. An assessment of the impact on local education provision is completed.

Comments:

Additional Evidence Link:

Comment ID **HRU1659**

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

Person ID: **1244084**

Name: **Mr Daniel Black**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The proposed development is contrary to government policy. It does not comply with NPPF guidelines, government guidelines on the use of green field sites or government guidance on building on flood zones.

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

Sound Reason:

Flood Risk ; Flooding is a huge issue around Calderdale. We have seen the disruption, chaos and pure misery this causes local residents as recent as 9 th February 2020 (see attached images). To suggest building such a huge development above and in a flood plain, just seems completely illogical. The negative impact that will be felt on properties that are already at risk and ones that will be at risk from an increase in water runoff is beyond comprehension. For this reason alone, the development should be rejected. To even suggest increasing the risk of flooding to local residents is mind boggling. Highway / Local Infrastructure : The development will have a hugely negative effect on the already extremely busy Saddleworth road / Stainland Road and Rochdale Road / Stainland road junctions. The roads already struggle to cope with the amount of traffic from commuting, so it seems implausible to increase the traffic by a potential 1000+ additional vehicles using this route. The junctions at the Co-op on Saddleworth road and Tesco on Stainland road are already extremely dangerous for pedestrians, this danger would amplify significantly due to the increased usage from the residents of the proposed development. Parking is also a huge problem in West Vale, to increase the local population by such a large number would put the already lacking parking to bursting point and would increase risk to drivers and pedestrians safety massively. The local school has no capacity to extend, and has expressed several times that it is not willing to extend. The doctor's surgery is already packed and it can take several weeks to get an appointment. Local dentists are not accepting any NHS patients. There is also a huge shortage of police numbers for an area recently targeted by gangs of car thieves, to increase the number of potential victims of crime, would put a huge strain on an already stretched Police service. POLLUTION / AIR QUALITY ; The pollution caused from the increased number of cars on the roads is unimaginable and the health of the Junior School children would be at a high risk as would the whole community. It is a fact that increased pollution would seriously affect the health of our children both now and in future generations. Noise pollution ; The proposed development will directly, negatively affect the quality of life of local people through noise pollution for many years, due to building work and industrial machinery. This will also have an adverse effect on the wildlife that will be disrupted, particularly during mating season. Greenbelt & Wildlife - The proposal is also an inappropriate development within greenbelt land. Consideration to build such a large number of dwellings on Green Belt land is totally against all current guidelines and recommendations. Earlier surveys stated the area to be "highly sensitive" The area is a haven for Deer, foxes, Herons, bats and more recently the owls have returned. Not to mention the joy it brings to walkers. Size and density of proposed development - The layout and density of the proposed development is inappropriate to the local area, as forementioned, the infrastructure simply could not handle such an increase in residents or traffic. This development has already been rejected previously, so to regurgitate the same plans without any solutions to flooding, noise, pollution or risk to life concerns is to say the least, bazaar! 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/5610215> ; <http://calderdale-consult.objective.co.uk/file/5610212>

Comment ID **HRU1669**

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 due 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 site from the Local Plan. Increase density in Brighouse. Revisit the out-of-date, inflated housing requirement.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5610225>

Comment ID **HRU1679**

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

Person ID: **1243877**

Name: **Mrs Pauline Atkinson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

I do not consider that it is a sound plan for the following reasons, Infrastructure Building new houses away from amenities and town centres with no proposed infrastructure results in a negative impact on the whole planet. This is not town planning this is a knee jerk reaction to an uplift requirement in the housing numbers. The resulting extra traffic will result in extra CO2 emissions this does not correlate with the 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 appear to consider accommodating the houses in neighbouring authorities. It is therefore felt that the council has not fully exhausted all options in order to prevent the development on Green Belt. The development will be more than 2KM from a train station. Grade 3 agricultural land will be lost. Loss of habitat for animals such as Woodpecker, deer, pheasants, owls, bats, Kestrels and herons. Flooding I have lived in Greetland for 43 years. In the past 5 years I have noticed the flooding getting a lot worse, however there has been minimal flooding of houses in Greetland as sites such as LP0177 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?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Remove site from the Local Plan

Comments:

Additional Evidence Link:

Comment ID **HRU1691**

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

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 and tranquil space where people can get away from the stresses of life. It is also within walking distance of the local community and therefore people do not have to drive to enjoy the countryside. 5 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 believe this land should be removed from the local plan and other brownfield sites identified instead

Comments:

Additional Evidence Link:

Comment ID **HRU1693**

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

Person ID: **959164** Name: **Mrs Sabine Brady** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

It has been mentioned that with regards to Greetland, only sites (such as LP0177) with a developer already on board have been included by the council. If this is indeed the case, then its legality under planning laws needs to be investigated.

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

Sound Reason:

The plan is unsound as it does not conform with the National Planning Policy Framework in regards to Green Belt development. The following have not been properly considered when including LP0177 in the plan. Green Belt Flooding Infrastructure/Amenities Location Air quality Wildlife Corridor All the above have been exhaustively covered in submissions by others for this site (LP0177).

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

Duty to Co-operate Reason:

Website is difficult to navigate, Greetland is included under the header "Elland" where for many residents it would not be expected to be found. Reintroduction of the Greetland sites including LP0177 was not an open process, our local councillor informed us that the decision was taken at a meeting with very short notice given.

Suggested Modifications:

1) Do not accept the demands of central government to increase the new housing requirement, the plan was developed pre-Brexit and is no longer fit for purpose. 2) Modify the plan to reduce Green Belt development such as LP0177.

Comments:

Additional Evidence Link:

Comment ID **HRU1695**

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

Person ID: **1244155**

Name: **Mr Michael Ashcroft**

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 development'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 therefore 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 explanation 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 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". 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 Council (2015) EWHC 1078 (Admin), Jay J - where Richard Turney appeared for the claimant "Mr Turney ... submitted that the fact that a particular site happens to be suitable for housing development cannot, without more, constitute an exceptional circumstance justifying an alteration of the Green Belt. I agree with Mr Turney insofar as this goes .. Suitability simpliciter cannot logically be envisaged as an exceptional circumstances". 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 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: 1. 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: i. 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 ii. 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 demonstrated in paragraphs 133 and 134. 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. 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. 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" but 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 be 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 its banks it naturally chooses 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 is 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 UDP 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 there any demonstration that the re-allocation of the site would comply with the above. Furthermore, as detailed above there is not 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 through 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 naïve 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 site 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 the 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 or 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 states that "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 **HRU1703**

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:

Detailed in text box for 'soundness' below

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

Sound Reason:

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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 Brighthouse 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 there 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 through 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 naïve 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 site 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 the 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 or 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 states 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	HRU172	Site ref (if applicable):	LP0177
Person ID:	1241848	Name:	Mr Eric Williams
		Organisation:	
Agent ID:		Name:	
		Organisation:	
Do you consider the plan to be Legally Compliant?: No			
Legal Compliance Reason:			
See 'Sound'			

Do you consider the plan to be Sound?: No

Sound Reason:

Calderdale Council have been extremely disingenuous with regard to a number of things in their Local Plan proposals: Elland? For some reason they have lumped Greetland with Elland and Stainland as though they were one district of Calderdale. They are not and never have been. This has the effect of making the increase in housing modest for the larger area, when in fact the additional proposed housing would increase Greetland's housing by a further 20%! This would be an unworkable ridiculous increase on the roads and services of the area. There are only two main roads through Greetland, both of which already have extremely serious congestion problems, in particular around the school buildings, and at the bottom of where they join West Vale. The school is already full and oversubscribed and would lead to significant increases in traffic travelling both out of, and into, the area. Maps! The maps on the Council websites are deceitfully wrong. When you click 'Green belt' it does not show the proposed areas as green belt, which they absolutely are. The same is the case for 'Wildlife habitat network'. This whole area is part of this wildlife corridor. The Council's obscure view implies that the proposed area is free of these labels, trying to conjure an untruth, like a magician. Priorities ; Housing vs Climate Emergency Calderdale Council at the

start of 2019 'declared a Climate Emergency', 'A bold move', 'to step up action to tackle climate change'. The announcement included focus on 'significant impact on our health and wellbeing', 'air quality' and 'wildlife habitats at risk' with a commitment to taking a lead locally. If this is the case then why are they putting housebuilding above wildlife, serious air pollution and the health and wellbeing of the Greetland community. The area concerned is an area of outstanding natural beauty. A place to go to get away from the ever-increasing pressures of daily life. On one recent walk along the brook, my wife and I saw; a dipper, a kingfisher and 4 herons. Of course, the dipper and the kingfisher were in the brook itself, but the herons were in the air and all landed in a field around 50 metres from the brook (i.e. not in the proposed 10m corridor). We have visited both the Lake District and the Yorkshire Dales many times each year over the last 40 years and have never seen such a spectacle on one walk. Just in 2020 we have seen a large amount of wildlife in the fields included in the proposal, including; pheasant, thrush, a variety of tits and just last week - a very large fox. The Council should be putting the right things in the right places. This proposed area is perfect for the increase in woodland needed. This would not just be a real positive benefit to the inhabitants of Greetland, but the whole of Calderdale and beyond. Flood risk?! Calderdale Council indicate the area may be a flood risk. It is not, it is a flood area. There have been many serious floods on the proposed land over the years (& proportionately more over recent years). As far as I was aware, green belt land should only be built on in exceptional circumstances - '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'. I do not believe and am not aware of any evidence shown by the council that satisfies this. If the need is really there for such an increase in housing in Calderdale (which is still questionable), there are many brownfield sites that are not being considered and many other non-greenbelt sites that have a lower impact on the environment.

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

Duty to Co-operate Reason:

See 'Sound'

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1722**

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

Person ID: **1244178**

Name: **LYNDSEY ASHTON**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I do not believe that the Local Plan adheres to legislation set out in The Climate Change Act 2008 (2050 Target Amendment). I am not able to see any evidence of additional measures to respond to climate impacts of above-trend growth in employment and housing.

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

Sound Reason:

Flooding ; Part of the land allocated in the Local plan is allocated as Zone 3a, and it is at the bottom of the chain of development. Development is only acceptable if sequential and exceptions tests 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, "We never had flooding problems when this site was a meadow and did its job as a meadow and soaked up rainfall, releasing it slowly into the woods. Due to the topography of the area and surrounding areas, we have already experience catastrophic destruction, as seen in 2015 when a major bridge, Elland Bridge, was destroyed by flood water, causing huge disruption and economic expense. Last weekend, flood water carried a shipping container, from Greetland, downstream until it eventually crashed into Elland Bridge. The Bridge had not yet been open three years since being rebuilt due to the last flood. The council had to inspect the bridge for structural damage after last weekend. How can building houses in a high-risk flood area be inline with the NPPF's golden thread of sustainability? The economic ramifications in the form of destroyed infrastructure alone is enough to void this development proposal.

Prime Minister Boris Johnson has even, on multiple occasions in the press, called for councils to stop allowing building on flood plains. As a community, and as the people who experience first-hand, all year round how unpredictable the water

system is in this area, we are constantly reminded of the topography of our landscape and the surrounding areas, and the impact it already has on our lives. Over thirty million pounds has so far been spent on flood defences in Calderdale, and still we are having to have the Army called in to help protect us from flood water. It is not right to build on the land in Greetland put forward in the Local Plan. Flooding cannot be mitigated against in this area. The land as it stands, is helping to prevent further disaster, and must remain as it is. To even suggest altering the way in which this land functions is an inappropriate and irreversible gamble. It is not fair to gamble with the lives of the community, when the community is so opposed to it. The NPPF states that the Local Plan should take account of climate change over a long period of time, including factors such as flood risks, changes to biodiversity and landscape. The NPPF also states that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. To so dramatically change the function of the landscape of the sites put forward for development in Greetland would completely disregard the risk climate change poses to the community on the form of flooding. For anyone to tell us that the huge volumes of water we regularly see on this land will not affect existing property when it is disturbed, we would need to see evidence of prolonged, extensive surveying carried out all year round, and for a number of years. Understanding our complex water system, further complicated by our intricate system of natural underground springs is not easily, if ever, achievable. A testament to this aspect of our topography is evident in the numerous roads and lanes named after their relationships to water and springs. Much of what causes the problems we face in this area is hidden underground in a network, or labyrinth, of fresh water springs. How can we predict how the water will behave after its usual pathways have been disrupted? We have already witnessed how smaller developments in the area, having interfered with the underground water course, have had disastrous impacts on other surrounding properties. If you would like to see photographic evidence to prove this, we have it prepared for you. Green Belt: The Green Belt Review carried out in 2017 considered all three of the sites ; reference numbers 065 and 339 in the review. The conclusion of this review was that all of the sites performed strongly in terms of their Green Belt function, meeting at least 3 of the 5 purposes of including land in the Green Belt. Those 3 purposes were: To prevent neighbouring towns from merging into one another; To assist in safeguarding the countryside from encroachment; To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The 0952 allocation was also considered to meet a further purpose in terms of checking the unrestricted sprawl of large built up areas. We would argue that all three of the sites should be considered to serve this purpose, it makes no sense for just 0952 to do so but 0177 and 1625 not to, given they are all inextricably linked. Development of all sites would result in the unrestricted sprawl of the large built up urban area of Greetland. The three site assessment reports carried out ahead of the consultation on the Local Plan Publication Draft in 2018 concluded that the land represented the "œmost sensitive Green Belt" Given this there is no planning policy justification to ignore that impact ; importantly carried out as part of a thorough Green Belt Review of the borough just over 2 years ago ; and now consider the sites suitable for allocation for housing. Such allocation would conflict with key purposes of including land in the Green Belt and would have a fundamental adverse impact on the openness of the Green Belt. Schools: Paragraph 94 of the NPPF states that 'It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: 28 a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and b) work with schools, promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.' The Local Plan in Greetland has not seen any of this work done in relation to the local junior schools. As far as parents and the local community is aware the local school has not been consulted on the Local Plan. Due to the fact that The Greetland Academy and West Vale School are academies, they cannot be pushed to expand, so perhaps this is why they have not been consulted, however, this is in direct opposition to the National Planning Policy Framework, and therefore not compliant. We know that the primary school is already oversubscribed. The scale of proposed development would completely overwhelm an already oversubscribed school. Children

already living in Greetland may face a situation where there is no place available to them at their local junior school. There is also a very real increased risk posed to the children of Greetland Academy, should the proposed development go ahead. Paragraph 109 of the NPPF states that, 'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.' I feel that it is my civic duty and moral responsibility to inform the inspector of the current unsafe road conditions on Saddleworth Road, in the surrounding area of the school and preschool. The school is situated on Saddleworth Road, which is already a very busy road, currently with its own safety and air quality concerns. At school drop-off/pick-up times, Saddleworth is reduced to a single lane due to the parked cars of parents, and with significant and unusually high numbers of HGVs using this road, due to the recycling plant further along the road, this makes for a hostile level of traffic and congestion at busy times, and these are the times when the children of our community are on the roads and at the greatest risk. Any further increase to traffic, especially such a significant one, due to the fact that the development is proposed for this road, and this road alone, would render the road unsafe, specifically due to the number of children on the roadside. Parents already worry about the safety of their children while using this road. Those in power should be taking measures to make the road safer, not putting vulnerable children at an increased risk. When a child is killed on this road, it will be too late. Due to the level of traffic and the type of traffic, namely the large number of HGVs, this road is not suitable for Local Plan development, especially when we consider the risk it would pose to young children. On top of this increased risk of a fatal road traffic incident, the proposed development would also introduce a dramatic increase in air pollution. The proposed development would create a dangerous environment for pedestrians, with no option for mitigation. This road is unable to be made wider. To slow traffic down would only further exacerbate congestion and air pollution in the air that the community and its children have no choice but to breathe. Traffic Impact: In the Council's individual assessments of the sites which resulted in them all being filtered and not taken forward for housing, the consultation from Highways England advised that the development of the scale envisaged would have a significant adverse traffic impact on the Strategic Road Network. Given this how can the sites now be put forward for allocation for housing when nothing has been done to either challenge those comments or address them? The sites in Greetland have not had traffic assessments carried out. Sites elsewhere in Calderdale have been filtered from the Local Plan due to traffic constraints. Given the existing levels of high congestion at the West Vale traffic lights, why has assessment not been carried out? Why has air pollution not been measured? Is it because the sites in Greetland are too appealing to developers, given the high house prices in the area, and some thing like a traffic assessment would throw a spanner into the works, as it were? Where is the Traffic Plan in the site reports for these sights? These sites have been allocated without appropriate assessment of local road networks. To say that the cumulative traffic impact is being assessed is not sufficient, especially given the scale of the proposed development. To increase the amount of traffic on Saddleworth Road, when it is already so heavily congested, and with a high volume of HGVs, by any amount of traffic, without a proper assessment is not a sustainable practice in planning terms. Air pollution: My final point I ask you to consider is the impact of the development on the health of the people in this area, particularly those who live on Saddleworth Road, especially our children, who spend the majority of their waking hours in the primary school and preschool, which are both situated on Saddleworth Road. Our ward already has the highest percentage of cars per household, and this is set to rise by a disproportionately high amount, in line with the disproportionately high number of houses proposed in the plan. A development site, within Calderdale, was thrown out for precisely the same reason. Yet, our site remains, even with such a high - the highest - percentage of cars per household. Due to the lack of public transport, because we live in a semi-rural area, the community does rely heavily on transportation by car, which would unavoidably be the same case for the new residents, should the development go ahead. A wooden fence and a strip of pavement is all that separates the children from the road. A catastrophic increase in air pollution, which is in direct opposition with government legislation to reduce air pollution, is further exacerbated by the fact that Saddleworth Road is unable to manage the current level of congestion. We have extensive photographic evidence of this. Such a disproportionately

high increase in air pollution will have unthinkable implications for the children of our community. If the government has set targets to reduce air pollution then it does not make sense to allocate such a vast proportion of the overall planning to one area, along one road, where the pollution in the air will become concentrated and toxic. Calderdale Council have taken steps to reduce air pollution, but the air quality in our area has not been tested. What we as a community cannot support is a huge rise in concentrated air pollution, this is air that young children are forced to breathe every day on their way to and from school, and during their time at school and preschool. These young, vulnerable children will be at a significantly increased risk of developing lifelong debilitating diseases. This is an issue the government has established as a real problem. The amount of traffic in this area would increase anyway, due to other agreed development sites in neighbouring villages, like Elland. Traffic is regularly at a standstill on Saddleworth road, and with the increase of cars on this road, we can expect to see cars at a standstill as far back as the school, which at times is already the case. We have the photographs to prove this. This will result in car fumes being pumped directly, at concentrated levels, into the delicate, developing lungs of school and preschool children. Everyone in the area will be affected by the huge and disproportionate increase in air pollution, but the children will bear the brunt of the health implications. The polluted air is heavier than clean air, and thus collects closer to the ground. The knock-on effect of this is that the toxic air will fall down the hillside, and even though the school is not as close to Saddleworth Road as Sunnybank Preschool, the school children could stand to experience even worse effects. We have a duty of care to safeguard our children from breathing in such an exponentially increased level of poisonous air. The measures needed to avoid this are simple and easy to take. We can very easily protect these children. If you poison the children, you poison the future of the economy too. As stated on the World Health Organisation's official website, 'An estimated 3.7 million premature deaths are attributed to ambient (outdoor) air pollution, based on WHO data from 2012. Overall, higher urban air pollution concentrations increase the risk for cardiovascular and respiratory disease, cancer and adverse birth outcomes, and also are associated with higher death rates.' The single biggest air polluter is traffic, or road vehicles. More people die of air pollution than Malaria and HIV. For this reason, we cannot allow the toxic chemicals released by cars to increase so dramatically, and directly into the air around Greetland School and Sunnybank Preschool. The World Health Organisation explains that, 'One reason why children are particularly vulnerable to the effects of air pollution is that they breathe more rapidly than adults and so absorb more pollutants. They also live closer to the ground, where some pollutants reach peak concentrations; at a time when their brains and bodies are still developing.' These are points highlighted in the Clean Air Strategy 2018. While we do need to ensure economic growth, we also need to realise the 'cost of air pollution on health,' as stated in the Clean Air Strategy 2018. 'There are legal requirements and aspirational targets for levels of different air pollutants. The government recognises that protective health - and tackling air pollution - requires action, and is committed to improving the UK's air quality and reducing harmful emissions. The draft Clean Air Strategy, published in May 2018, sets out the case for action and demonstrates the government's determination to improve our air quality.'

<https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-air-pollution>

The above is taken directly from the government websites. The proposed plan is directly opposed to the Clean Air strategy, as the amount of land allocated on Saddleworth Road is disproportionate to the amount of land Calderdale has to allocate as a whole. The overall air pollution will be harmfully concentrated on this one road, a road with an unusually high concentration of children so close by for so much time. Each child spends approximately 7 hours a day on this road, including walking to and from school, which amounts to 35 hours a week. 35 hours a week they will be forced to breathe air that is exponentially more toxic than at present. This is not acceptable, and yet is totally avoidable. Again, we support the need for housing, but simply ask that it is in a place that has less impact on the health of the community, especially the health of our children. We only ask that the life that already exists in this area is respected and not jeopardised. Sustainability: At the heart of the National Planning Policy Framework is the presumption in favour of sustainable development, which should be viewed as a golden thread running through both plan-making and decision-making. In part, the NPPF requires developers to demonstrate the economic,

environmental and social impacts of a development by way of a sustainability appraisal. It is the argument of the community that the sustainability appraisal conducted for the Local Plan sites in Greetland is insufficient, as the proposed development in Greetland is actually very much unsustainable. Section 11 in the NPPF outlines what is meant by the efficient use of land. It states that the Local Plan must follow planning policies and make decisions which encourage the efficient use of land by re-using land that has previously been developed (brownfield land). This has not been close to effectively carried out in the area. We have a number of undeveloped brownfield sites in the area, which have not been properly pursued. the revisions to the plan (the addition of the new sites) represents further unsustainable development with a disproportionate amount of new homes proposed across four sites in Greetland with 1,041 additional units of the 1,708 on new housing sites (over 60%) proposed in the Elland area. In particular, scrutiny needs to be made of the Council's Sustainability Appraisal process to support the release of the new sites with the site at 'Land adjacent Ellistones Place' (Ref: LP0177) the most striking example of officers reaching a

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1737**

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

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 **HRU1741**

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

Person ID: **1244195**

Name: **Mr James Fryer**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

There has been insufficient detail, consultation & community involvement in the plans for these sites and inadequate timescales allowed for the affected communities to understand the implications. The Sustainability Appraisal Report is insufficiently detailed around each potential development site. The constraints placed on the ability to object or provide comments (online portal) potentially prevent older or more vulnerable residents from having their say.

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

Sound Reason:

These comments apply in the main to site reference number LP0177 but in many aspects should also be taken as objections to site reference numbers LP0026, LP0952 & LP1625. I do not believe the plan to be sound for the following reasons:

Flood risk The proposed sites adjacent to Black Brook are a known flood plain, which have flooded many times in recent years, notably in 2015 & 2017 & most recently following Storm Ciara in Feb 2020. Building in these areas would have disastrous consequences for the owners of any new homes built on the site, as well as the nearby residents of existing homes, who have witnessed the very real effects of Black Brook overflowing in recent years. In addition, the flooding of this particular site has issues downstream from Black Brook, with similar recent examples of flooding at Greetland Cricket Club, Clayhouse Park and Heath Rugby Club. Building on the LP0177 site would inevitably amplify the likelihood and the impact of these flood risks.

Traffic The junction of Saddleworth Road with Stainland Road at West Vale is a known traffic bottleneck, as is the junction of Stainland Road with Rochdale Road at West Vale. Even when there are not roadworks going on, current traffic levels still result in traffic backing up from WV all the way up Saddleworth Road sometimes as far as Daleside in morning, evening & school run times. No matter what Calderdale Council has done or plans to do with traffic signals, traffic flow modelling or other actions, it is a reality that these junctions will ALWAYS be areas of significant congestion. So building the volume of houses that is suggested in the local plan will only make this situation significantly worse. There is simply no solution to it. It would be irresponsible of the council to sanction this building in the knowledge that the traffic problem cannot be solved.

Pollution The knock-on effect of the increased traffic & vehicle journeys would be a significant worsening in air quality in the area and be a huge potential risk to the health & wellbeing of the people in this area, both young & old. Carbon emissions would increase massively and be detrimental to not only health but also the ambitions of the council to minimise harm to the environment.

Infrastructure All the local schools (primary & secondary) do not have available capacity for a development of any size. The scale of the development (even just LP0177) would require the provision of a significant volume of additional school places. In addition the local infrastructure (doctor, dentist surgeries) is already at capacity.

Loss of Green Belt The National Policy Planning Framework (NPPF) states that (sic) inappropriate development is harmful to the Green Belt and should not be approved except in very special circumstances. No such special circumstances exist or have been detailed/shared in regard to these proposed developments. Preference should be given to developing available brownfield sites over depriving communities of Green Belt. The Greetland area, more specifically the Saddleworth Road corridor from West Vale to Barkisland, has an ideal balance between residential development and open, green spaces. To deprive this area of any of its green spaces would drastically alter the nature of this area and adversely affect the identity of this part of Calderdale.

Wildlife The green spaces that line the Saddleworth Road corridor from West Vale to Barkisland are known to be home to many species including bats, deer, herons & kingfishers. For these reasons I believe that these sites are wholly inappropriate for development and 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:

Insufficient detail on compliance requirements for these proposed developments.

Suggested Modifications:

Withdrawal of these sites from the Local Plan.

Comments:

Additional Evidence Link:

Comment ID **HRU1742**

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

Person ID: **1244133**

Name: **Miss Julie Carter**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Consultation has been very poor. There has been nothing clearly available that would be appropriate for anyone with a learning disability or communication difficulties as per the Accessible Information Standard.

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

Sound Reason:

GREEN BELT. Why has brownfield land not been considered? Green belt should be protected and according to Calderdale Council, Greener living is a top priority. The plans put the current and future wildlife at risk. FLOOD PLAIN. Surely no one in their right mind would buy property on this site. Has the developer or anyone from Calderdale Council seen it since the beginning of February? Any flood mitigation put in place will merely move the problem further down the area. TRAFFIC/ AIR POLLUTION. Saddleworth Road is already incredibly busy and varies in speed limits. This does not stop drivers from irresponsible driving parking, particularly around Greetland Academy. This plan would be putting children's health and safety at risk. INFRASTRUCTURE. The proposed development is completely disproportionate to the size of the village. Greetland is a village not a town. The local school is full. Dentists have long waiting lists. It is already almost impossible to get a GP appointment and GP recruitment is known to be in national crisis with a crumbling A&E system as a consequence.

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

Duty to Co-operate Reason:

This objection procedure is difficult to navigate even when computer savvy. Calderdale Council appears to be putting up as many barriers as possible to prevent people from having their say.

Suggested Modifications:

Remove this area as one for development from the local plan

Comments:

Additional Evidence Link:

Comment ID **HRU1765**

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

Person ID: **1244202**

Name: **Mr Adam Kershaw**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

see Calderdale recognised as a 'Tier 1' authority, which would entitle Calderdale to extra funding support, as 'Calderdale is one of a small number of areas in the country at "sustained risk" of flooding.' The head of our council has even recognised the significant threat we face in this area. The topographical context of the proposal in Greetland lends itself to increased flood risks, due to the abundance of natural springs, the water course, and the steep valley sides. All of the factors that contribute towards flooding are against us. Flooding in this part of Greetland is a certainty that grows year on year with the ever-increasing threat of Climate Change. The way in which this valley, with its steep sides, floods is a natural hazard. Residents on Woodfield Drive had to take action to prevent their homes from flooding in February 2020, and not for the first time either. We have photographic evidence of how this is a routine battle that residents face, and not enough is being done to help prevent this from happening in the future. To build on this land would be to sign residents and the community to an unbearable, unavoidable fate. The NPPF states that, 'due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere.' The topography of our area would not allow for it to be any other way than to increase the risk of flooding to the existing community. The sloping grassland, the trees and the flat flood plains of the land put forward in Greetland in the Local Plan retain an immeasurable amount of water when it really matters. No amount of 'mitigation' can compete with this. To build on this land would have catastrophic and irreversible ramifications, and not just for the immediate area, but for the areas further downstream currently protected by this precious land and the way it currently functions. Prime Minister Boris Johnson has even, on multiple occasions in the press, called for councils to stop allowing building on flood plains. Part of Site LP0177 lies within flood zone 3A ; the highest classification of flood risk in terms of land that could potentially be considered appropriate for development. The zone 3A is immediately adjacent to the western and southern boundaries of Woodfield Drive. The land immediately adjacent to the whole southern boundary of the proposed 3 allocation sites is also allocated as flood zone 3A. The photographs that are attached to this submission show the flooding that has occurred on the land. Given that the land is not only identified as being at risk of flooding but is also evidenced as having flooded, there is no justification in land drainage terms to bring these sites forward for housing. Paragraph 155 of the NPPF clearly states that, -"Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk" In putting these sites forward the Council is ignoring the policy requirements of the Framework. The reports compiled by the Council for all four sites on Saddleworth Road when putting together the Publication Draft version of the Local Plan in 2018 concluded that all three should be filtered (i.e. not taken forward as housing allocations) because of ; amongst other things ; flooding and drainage issues. Sequential and exceptions tests would have been necessary to demonstrate that the sites were suitable for and safe to develop. Although the Planning Inspector identified an insufficient supply of housing land following the Stage 1 examination process, it should not simply follow that additional sites are now allocated without a thorough assessment being made as to their suitability to counter the reasons why they were initially filtered. The four sites on Saddleworth Road seem to have been put forward as a simple response to the Inspector's comments with no consideration of the flooding and drainage issues associated with the land. It is clear that there are blurred lines of responsibility and accountability when serious flooding issues arise between Developers, Councils and the Environment Agency. We need accountability when reckless planning leads to catastrophic flooding issues. Green Belt The Green Belt Review carried out in 2017 considered all three of the sites ; reference numbers 065 and 339 in the review. The conclusion of this review was that all of the sites performed strongly in terms of their Green Belt function, meeting at least 3 of the 5 purposes of including land in the Green Belt. Those 3 purposes were: To prevent neighbouring towns from merging into one another; To assist in safeguarding the countryside from encroachment; To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The 0952 allocation was also considered to meet a further purpose in terms of checking the unrestricted sprawl of large built up areas. We would argue that all four of the sites should be considered to serve this purpose, it makes no sense for just 0952 to do so but 0177,

0026 and 1625 not to, given they are all inextricably linked. Development of all sites would result in the unrestricted sprawl of the large built up urban area of Greetland. The four site assessment reports carried out ahead of the consultation on the Local Plan Publication Draft in 2018 concluded that the land represented the -“most sensitive Green Belt” Given this there is no planning policy justification to ignore that impact ; importantly carried out as part of a thorough Green Belt Review of the borough just over 2 years ago ; and now consider the sites suitable for allocation for housing. Such allocation would conflict with key purposes of including land in the Green Belt and would have a fundamental adverse impact on the openness of the Green Belt. Erroneous justification of housing requirement for Green Belt release Green Belt boundaries should only be altered in 'exceptional' circumstances. This land has been identified as the Most Sensitive Green Belt. The Calderdale Local Plan, which has suffered from a democratic deficit throughout its many iterations, sets a target for housing based on pre-Brexit demographic evidence of Objectively Assessed Need (OAN). This means that the Green Belt as designated in the current UDP has had to be reviewed. The OAN is far too great and as it relates to out-of-date population projections used in Strategic Housing Market Assessment (and update) that have been superseded by lower projections in more recent Office of National Statistics releases that would result in a much lower housing target and the reduce the need to release the number of Green Belt sites. Further, the ambitions of the Council for annual jobs growth over a 16 year period characteristic of a constant 'boom' inflate the requirement well beyond the realistic possibility of actual delivery. It is not responsible to allocate land, including a significant amount of Green Belt release, to meet inflated housing targets based on out-of-date household projections and ambitious and continual jobs growth. The housing target needs revisiting to model scenarios reflective of evidenced-based jobs growth (rather than ambitions), up-to-date household projections (including post-Brexit population projections) and the priority to contribute to sustainable development that does not harm the environment (including the Council's Climate Emergency commitments). The Calderdale Local Plan has been overtaken by events both demographically, economically and environmentally. At this point, the Council is proposing to adopt a Local Plan that runs entirely against the corporate ambitions of the authority. It is simply the case that no plan at all (and reliance on the NPPF & NNPG to direct new developments, which would include the protection of sensitive Green Belt) would be better than the proposed Local Plan that is under examination. Disproportionate The most recent revisions to the Local Plan in response to the Inspector's letter include the addition of more Green Belt sites (including LP0026, LP0177, LP0952, LP1625) for release, which represents further unsustainable development as a disproportionate amount of the new homes proposed are across just four sites in Greetland. Indeed, 1,041 additional units of the 1,708 on these new housing sites (over 60%) are proposed in the Elland area alone. There has been substantial development of land in both Greetland and Elland in recent years. This cumulative development means that the land on Saddleworth Road is the only remaining parcel of the original Green Belt still in agricultural use. Development of the site would erode the visitor's understanding of the extent of the original manorial lands that Greetland covers.

Unsustainable Development The Council's Sustainability Appraisal process to support the release of the site is inadequate. The site report states that the assessment of SA7 is 'Negative' and marked 'RED' commenting that "Overall the impact is negative as the site is greenfield and lies within flood zones 2 and 3". The site should be excluded on this conclusion alone, particularly within the wider context of the Council's recent declaration of a Climate Emergency and recent flood events. Further, the report does not grapple with the issue in the overall conclusions inadequately noting that "with regards to SA7 and flood risk, the impact is negative as the site is greenfield and lies within flood zones 2 and 3" with no specific mitigation measures identified. This does not come anywhere close to an adequate assessment to justify release for development. The Sustainability Appraisal for the Local Plan has not been mapped or measured. The benefits of, or the opportunities for, the provision of ecosystem services by the Green Belt land directly around the urban environment are unrecorded. Section 39 of the Planning and Compulsory Purchase Act 2004 states that a local authority exercising their plan-making functions must do so with the objective of contributing to the achievement of sustainable development. Action 5 of the EU Biodiversity Strategy to 2020 requires member states to map and assess ecosystems, whilst the Minister of State for

the Environment reiterates the necessity to map and value the natural capital that make up ecosystem services, specifically in urban environments, in order to improve sustainable planning. Further, the NPPF sets out a presumption in favour of sustainable development and advises that the planning system should contribute to and enhance the natural and local environment by a number of measures that include 'recognising the wider benefits of local ecosystems. Wildlife Paragraph 175 of the NPPF states that, 'When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts)' which the community is immediately able to jump in with stating that this cannot be said to be the case in the Calderdale Local Plan, as land was removed from Stainland, which is far less sensitive, in terms of the risk development would pose to wildlife, biodiversity, habitat and landscape. In this way the land in Greetland put into the Local Plan is not compliant with the NPPF. Developer Influence Profit should not dictate planning policy, at a great cost to the environment. In relation to the rest of Calderdale, house prices in Greetland are very high. The developers have not expressed an interest in the overwhelming amount of brown field land available in Calderdale, because the return on investment is so much higher when development is passed in beautiful Green Belt land, set within a village connected to high house prices. The developer is further enabled to do this because it has a monopoly on the large-scale building development taking place in Greetland. Plans have been drawn up for the different sites within Greetland, the sites have been given different codes, and yet the land is almost entirely unseparated by anything physical; essentially, to this community, the separate plots are one piece of land, irrespective of who owns the land on the land register- the development will be concentrated in one place. Different developers have been assigned to the various codes given to our continuous area of Green Belt, however, when this is examined further, it becomes apparent that the developers largely belong to the same parent company. How can Calderdale Council resist pressure from this monopoly situation? They are already under time constraints to designate land to the Local Plan. This is a toxic situation for Calderdale, and thus renders it impossible for the council to deliver the right homes in the right places. The Local Plan in Calderdale has become entirely about developer profit, and not at all about growing the local economy for local people. Severe Lack of Infrastructure Greetland School is an Academy and therefore it is not obliged to expand. In the Council's individual assessments of the sites which resulted in them all being filtered and not taken forward for housing, the consultation from Highways England advised that the development of the scale envisaged would have a significant adverse traffic impact on the Strategic Road Network. Given this how can the sites now be put forward for allocation for housing when nothing has been done to either challenge those comments or address them? The sites in Greetland have not had traffic assessments carried out. Sites elsewhere in Calderdale have been filtered from the Local Plan due to traffic constraints. Given the existing levels of high congestion at the West Vale traffic lights, why has assessment not been carried out? Why has air pollution not been measured? Is it because the sites in Greetland are too appealing to developers, given the high house prices in the area, and something like a traffic assessment would throw a spanner into the works, as it were? Where is the Traffic Plan in the site reports for these sites? These sites have been allocated without appropriate assessment of local road networks. To say that the cumulative traffic impact is being assessed is not sufficient, especially given the scale of the proposed development. To increase the amount of traffic on Saddleworth Road, when it is already so heavily congested, and with a high volume of HGVs, by any amount of traffic, without a proper assessment is not a sustainable practice in planning terms. Heritage No assessment has been made of heritage impact The site assessment reports carried out in advance of the 2018 Publication Draft identified other areas of policy conflict with all three sites ; in particular heritage, open space and sustainability. It was at that time recommended that none of the sites on Saddleworth Road should be allocated until an assessment had been made of the heritage impact. To our knowledge that has not occurred. The sites were identified as providing valuable natural and semi-natural open space. This would be lost if the sites were allocated for housing. In terms of sustainability, a negative factor in not bringing the sites forward in the 2018 consultation was the distance to a railways station (in excess of 2kms). By definition that negative factor remains and forms part of the reason why other

potential sites in the area have not been brought forward (such as site LP1089 on Rochdale Road). Open Space There would be complete loss of natural and semi-natural open space Air Pollution The homes proposed in Greetland will significantly add to air pollution. This goes against The Clean Air strategy 2018 adopted by Calderdale Council; yet to build these houses would put our children who attend Greetland School and Sunnybank Pre-School at higher risk of ill health due to further increasing air pollution as their playground is only a couple of feet away from the already very busy congested main road which carries a lot of heavy good vehicles, due to a 24 hours recycling plant, which is only accessible by Saddleworth Road ; the road the development is intended for. Inflated housing target at the cost of great environmental harm Calderdale have based their growth on the WYCA anticipated employment figures (which is between 35,000 to 50,000 new jobs for the LeedsCity Region as a whole The Leeds City region has produced below average employment over the past 30 years but in their Strategic Economic Plan they envisage well above average growth in the next 15 years. This is extremely optimistic given that the current UNEMPLOYMENT rate in Yorkshire is 4.3% which is the second highest of any region in the UK and is currently increasing. If Calderdale's economic growth was more accurate, there would be no need to destroy precious Greenbelt land. The Council have proposed a number of alterations to its Green Belt boundaries to simply meet an inflated housing target at the cost of great environmental harm. The NPPF is clear that Green Belt should only be altered in exceptional circumstances through the preparation or review of a Local Plan. Where it is necessary to consider revision of the Green Belt, this review should be robust in its justification for any alteration ; which is critically missing. The critical importance of early and meaningful engagement and collaboration with communities in producing Local Plans, particularly where this involves altering Green Belt boundaries has not been undertaken as the site has been parachuted into the plan-making process during hearing sessions. This constitutes a serious breach of procedural compliance. A local pressure group has been set up at the last moment to attempt to deal with these issues locally and has attracted a significant amount of support. However, the community has not been given the opportunity to produce a Neighbourhood Plan. Neighbourhood Plans can be used by local people to positively shape development in their area, including establishing principles for how former Green Belt sites are developed. Summary All of the reasons why these sites were not brought forward at the Publication Draft stage remain just as relevant now. There has been no further assessment of any of the significant constraints which resulted in the sites being filtered at that stage. The only reason for bringing them forward for allocation now is based on a simple exercise of responding to a requirement to increase the housing supply. There is no justification for allocating these sites given the flood zone allocation and evidence of flooding and given the fundamental conflict with the Green Belt Review in 2017. No consideration has been given to the potential to bring forward other sites in the area that do not carry these fundamental problems. No consideration has been given either to the lack of infrastructure available in Greetland to accommodate such a significant level of new housing. The function of the planning system is to facilitate sustainable development that makes a positive contribution to the environment. It is not the role of the Council to recklessly release demonstrably unacceptable sites within the Green Belt to meet a housing target. The Inspector's letter of 16 July 2019 to the Council notes (Para. 14) that "Local Plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits". This is the undoubtedly the case here. No sensible phasing options are proposed related to release of the most sensitive Green Belt sites upon the requirement to demonstrate a five-year housing land supply even if the release could be justified. It is illogical to allocate Green Belt sites in Flood Risk Zones 2 and 3 for development before brownfield sites are fully exhausted. The immediate release of the site for development is simply not a sensitive approach to the release of Green Belt land even if it were to be appropriate. Later, the Inspector asked the Council to review the option of 'the supply of more suitable and available sites elsewhere' understanding this to be an option, however, the further work on the additional sites considered (incorrectly by the Council) to be 'suitable and available' are not, in fact, suitable and, in any case, it has been revealed that this option on all sites on Saddleworth Road, Greetland (identified below) is simply not sustainable and the proposal is unsound. LP0026 - The Gate Farm, Saddleworth Road, Greetland, Elland, 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 regional news. National news is now starting to contact the pressure group. This is something we have not gone looking for, but instead finds us, due to our level of flood risk, or 'flood certainty' as it is now known within the community. We are a small village in Calderdale Yorkshire, why are we being contacted by national media outlets? The issues we face here are real and they are huge. The entire span of land on LP0177 including South of Greetland Academy School was severely flooded in February 2020 (evidence attached). Greetland Pressure Group has attracted attention from both local and regional press and TV with regards to recent flooding and proposed development. This land routinely floods and would leave any proposed development at risk along with any access roads. Development sites LP0177, LP0026, LP0952, LP1625 are critically important in alleviating any further flooding issues by soaking and storing surface water run off from the large amount of natural springs in the area. The Army was even called into Calderdale, in a bid to help protect people and property from yet another severe flood, also in February 2020. The way in which the Calder Valley routinely experiences flooding can be best understood by Tim Swift's, Calderdale Council Leader, words when he urged the government to grant Calderdale urgent assistance. Swift would like to see Calderdale recognised as a 'Tier 1' authority, which would entitle Calderdale to extra funding support, as 'Calderdale is one of a small number of areas in the country at "sustained risk" of flooding.' The head of our council has even recognised the significant threat we face in this area. The topographical context of the proposal in Greetland lends itself to increased flood risks, due to the abundance of natural springs, the water course, and the steep valley sides. All of the factors that contribute towards flooding are against us. Flooding in this part of Greetland is a certainty that grows year on year with the ever-increasing threat of Climate Change. The way in which this valley, with its steep sides, floods is a natural hazard. Residents on Woodfield Drive had to take action to prevent their homes from flooding in February 2020, and not for the

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

Green Belt boundaries should only be altered in 'exceptional' circumstances. This land has been identified as the Most Sensitive Green Belt. The Calderdale Local Plan, which has suffered from a democratic deficit throughout its many iterations, sets a target for housing based on pre-Brexit demographic evidence of Objectively Assessed Need (OAN). This means that the Green Belt as designated in the current UDP has had to be reviewed. The OAN is far too great and as it relates to out-of-date population projections used in Strategic Housing Market Assessment (and update) that have been superseded by lower projections in more recent Office of National Statistics releases that would result in a much lower housing target and the reduce the need to release the number of Green Belt sites. Further, the ambitions of the Council for annual jobs growth over a 16 year period characteristic of a constant 'boom' inflate the requirement well beyond the realistic possibility of actual delivery. It is not responsible to allocate land, including a significant amount of Green Belt release, to meet inflated housing targets based on out-of-date household projections and ambitious and continual jobs growth. The housing target needs revisiting to model scenarios reflective of evidenced-based jobs growth (rather than ambitions), up-to-date household projections (including post-Brexit population projections) and the priority to contribute to sustainable development that does not harm the environment (including the Council's Climate Emergency commitments). The Calderdale Local Plan has been overtaken by events both demographically, economically and environmentally. At this point, the Council is proposing to adopt a Local Plan that runs entirely against the corporate ambitions of the authority. It is simply the case that no plan at all (and reliance on the NPPF & NNPG to direct new developments, which would include the protection of sensitive Green Belt) would be better than the proposed Local Plan that is under examination. Disproportionate The most recent revisions to the Local Plan in response to the Inspector's letter include the addition of more Green Belt sites (including LP0026, LP0177, LP0952, LP1625) for release, which represents further unsustainable development as a disproportionate amount of the new homes proposed are across just four sites in Greetland. Indeed, 1,041 additional units of the 1,708 on these new housing sites (over 60%) are proposed in the Elland area alone. There has been substantial development of land in both Greetland and Elland in recent years. This cumulative development means that the land on Saddleworth Road is the only remaining parcel of the original Green Belt still in agricultural use. Development of the site would erode the visitor's understanding of the extent of the original manorial lands that Greetland covers.

Unsustainable Development The Council's Sustainability Appraisal process to support the release of the site is inadequate. The site report states that the assessment of SA7 is 'Negative' and marked 'RED' commenting that "Overall the impact is negative as the site is greenfield and lies within flood zones 2 and 3". The site should be excluded on this conclusion alone, particularly within the wider context of the Council's recent declaration of a Climate Emergency and recent flood events. Further, the report does not grapple with the issue in the overall conclusions inadequately noting that "with regards to SA7 and flood risk, the impact is negative as the site is greenfield and lies within flood zones 2 and 3" with no specific mitigation measures identified. This does not come anywhere close to an adequate assessment to justify release for development. The Sustainability Appraisal for the Local Plan has not been mapped or measured. The benefits of, or the opportunities for, the provision of ecosystem services by the Green Belt land directly around the urban environment are unrecorded. Section 39 of the Planning and Compulsory Purchase Act 2004 states that a local authority exercising their plan-making functions must do so with the objective of contributing to the achievement of sustainable development. Action 5 of the EU Biodiversity Strategy to 2020 requires member states to map and assess ecosystems, whilst the Minister of State for the Environment reiterates the necessity to map and value the natural capital that make up ecosystem services, specifically in urban environments, in order to improve sustainable planning. Further, the NPPF sets out a presumption in favour of sustainable development and advises that the planning system should contribute to and enhance the natural and local environment by a number of measures that include 'recognising the wider benefits of local ecosystems. Wildlife Paragraph 175 of the NPPF states that, 'When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts)' which the community is immediately able to jump in with

stating that this cannot be said to be the case in the Calderdale Local Plan, as land was removed from Stainland, which is far less sensitive, in terms of the risk development would pose to wildlife, biodiversity, habitat and landscape. In this way the land in Greetland put into the Local Plan is not compliant with the NPPF. Developer Influence Profit should not dictate planning policy, at a great cost to the environment. In relation to the rest of Calderdale, house prices in Greetland are very high. The developers have not expressed an interest in the overwhelming amount of brown field land available in Calderdale, because the return on investment is so much higher when development is passed in beautiful Green Belt land, set within a village connected to high house prices. The developer is further enabled to do this because it has a monopoly on the large-scale building development taking place in Greetland. Plans have been drawn up for the different sites within Greetland, the sites have been given different codes, and yet the land is almost entirely unseparated by anything physical; essentially, to this community, the separate plots are one piece of land, irrespective of who owns the land on the land register- the development will be concentrated in one place. Different developers have been assigned to the various codes given to our continuous area of Green Belt, however, when this is examined further, it becomes apparent that the developers largely belong to the same parent company. How can Calderdale Council resist pressure from this monopoly situation? They are already under time constraints to designate land to the Local Plan. This is a toxic situation for Calderdale, and thus renders it impossible for the council to deliver the right homes in the right places. The Local Plan in Calderdale has become entirely about developer profit, and not at all about growing the local economy for local people. Severe Lack of Infrastructure Greetland School is an Academy and therefore it is not obliged to expand. In the Council's individual assessments of the sites which resulted in them all being filtered and not taken forward for housing, the consultation from Highways England advised that the development of the scale envisaged would have a significant adverse traffic impact on the Strategic Road Network. Given this how can the sites now be put forward for allocation for housing when nothing has been done to either challenge those comments or address them? The sites in Greetland have not had traffic assessments carried out. Sites elsewhere in Calderdale have been filtered from the Local Plan due to traffic constraints. Given the existing levels of high congestion at the West Vale traffic lights, why has assessment not been carried out? Why has air pollution not been measured? Is it because the sites in Greetland are too appealing to developers, given the high house prices in the area, and something like a traffic assessment would throw a spanner into the works, as it were? Where is the Traffic Plan in the site reports for these 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 Leeds City Region as a whole). The Leeds City region has produced below average employment over the past 30 years but in their Strategic Economic Plan they envisage well above average growth in the next 15 years. This is extremely optimistic given that the current UNEMPLOYMENT rate in Yorkshire is 4.3% which is the second highest of any region in the UK and is currently increasing. If Calderdale's economic growth was more accurate, there would be no need to destroy precious Greenbelt land. The Council have proposed a number of alterations to its Green Belt boundaries to simply meet an inflated housing target at the cost of great environmental harm. The NPPF is clear that Green Belt should only be altered in exceptional circumstances through the preparation or review of a Local Plan. Where it is necessary to consider revision of the Green Belt, this review should be robust in its justification for any alteration; which is critically missing. The critical importance of early and meaningful engagement and collaboration with communities in producing Local Plans, particularly where this involves altering Green Belt boundaries has not been undertaken as the site has been parachuted into the plan-making process during hearing sessions. This constitutes a serious breach of procedural compliance. A local pressure group has been set up at the last moment to attempt to deal with these issues locally and has attracted a significant amount of support. However, the community has not been given the opportunity to produce a Neighbourhood Plan. Neighbourhood Plans can be used by local people to positively shape development in their area, including establishing principles for how former Green Belt sites are developed. Summary All of the reasons why these sites were not brought forward at the Publication Draft stage remain just as relevant now. There has been no further assessment of any of the significant constraints which resulted in the sites being filtered at that stage. The only reason for bringing them forward for allocation now is based on a simple exercise of responding to a requirement to increase the housing supply. There is no justification for allocating these sites given the flood zone allocation and evidence of flooding and given the fundamental conflict with the Green Belt Review in 2017. No consideration has been given to the potential to bring forward other sites in the area that do not carry these fundamental problems. No consideration has been given either to the lack of infrastructure available in Greetland to accommodate such a significant level of new housing. The function of the planning system is to facilitate sustainable development that makes a positive contribution to the environment. It is not the role of the Council to recklessly release demonstrably unacceptable sites within the Green Belt to meet a housing target. The Inspector's letter of 16 July 2019 to the Council notes (Para. 14) that "Local Plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits". This is the undoubtedly the case here. No sensible phasing options are proposed related to release of the most sensitive Green Belt sites upon the requirement to demonstrate a five-year housing land supply even if the release could be justified. It is illogical to allocate Green Belt sites in Flood Risk Zones 2 and 3 for development before brownfield sites are fully exhausted. The immediate release of the site for development is simply not a sensitive approach to the release of Green Belt land even if it were to be appropriate. Later, the Inspector asked the Council to review the option of 'the supply of more suitable and available sites elsewhere' understanding this to be an option, however, the further work on the additional sites considered (incorrectly by the Council) to be 'suitable and available' are not, in fact, suitable and, in any case, it has been revealed that this option on all sites on Saddleworth Road, Greetland (identified below) is simply not sustainable and the proposal is unsound.

- LP0026 - The Gate Farm, Saddleworth Road, Greetland, Elland, HX48NW
- LP0177 - Land adjacent Ellistones Place, Saddleworth Road, Greetland, Elland, HX4 8NW
- LP0952 - Land at New Gate Farm, Saddleworth Road, Greetland, Elland
- LP1625 - Land to the west of, Silverdale Terrace, Greetland, Elland, HX4 8NQ

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

Duty to Co-operate Reason:

Suggested Modifications:

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

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5610756>

Comment ID **HRU1767**

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

Person ID: **960100**

Name: **Mrs Jessica Lawson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

No, the current policy on flooding states that new development on flood risk areas would only be allowed when it is exceptionally necessary. There are currently sufficient properties on the market in Calderdale to deem this not exceptionally necessary and Calderdale is a Tier 1 flood zone area.

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

Sound Reason:

As per my objection letter this land being included in the local plan contravenes paragraph 80 of the NPPF around urban sprawl as it removes green belt land from the local area. This development would also contravene paragraph 98 around the protection and enhancement of public rights of way. This development puts a disproportionate amount of houses into the local area putting further pressure on already full schools and local amenities.

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

Duty to Co-operate Reason:

No as it does not comply with legislation on building on flood risk areas and there is no justification for this to be classed as -"exceptional circumstance"

Suggested Modifications:

Remove this land from the local plan to prevent further flooding in west vale, Elland and Brighouse and to enable the protection of the wildlife corridor

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5610757>

Comment ID **HRU1770**

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

Person ID: **960100**

Name: **Mrs Jessica Lawson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

No, the current policy on flooding states that new development on flood risk areas would only be allowed when it is exceptionally necessary. There are currently sufficient properties on the market in Calderdale to deem this not exceptionally necessary and Calderdale is a Tier 1 flood zone area.

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

Sound Reason:

As per my objection letter this land being included in the local plan contravenes paragraph 80 of the NPPF around urban sprawl as it removes green belt land from the local area. This development would also contravene paragraph 98 around the protection and enhancement of public rights of way. This development puts a disproportionate amount of houses into the local area putting further pressure on already full schools and local amenities.

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

Duty to Co-operate Reason:

No as it does not comply with legislation on building on flood risk areas and there is no justification for this to be classed as - "exceptional circumstance"

Suggested Modifications:

Remove this land from the local plan to prevent further flooding in west vale, Elland and Brighouse and to enable the protection of the wildlife corridor

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5610759>

Comment ID **HRU1773**

Site ref (if applicable):

Person ID: **960100**

Name: **Mrs Jessica Lawson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

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/5610764>

Comment ID **HRU1789**

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/5610885>

Comment ID **HRU1809**

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 as necessary for health and well being.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1816**

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:

LP0177 Land Adjacent Ellistones Place Sustainable Development The planning system is there to facilitate sustainable development. I am not opposed to the building of houses but support the building of the right type of homes in the right places. I am not convinced that the council has fully considered the many brown-field sites or areas that could be used for in-filling throughout Calderdale. The plans for this site are not sustainable. 279 new houses on this site as part of over 600 new homes in a village of this size is disproportionate and would significantly alter the existing cohesive community. Green Belt The use of Green Belt land would have an adverse impact on this area which SIGNIFICANTLY outweighs the benefits. Apart from the obvious environmental benefits, this green land provides a definite boundary between this

semi-rural community and others ; it prevents URBAN SPRAWL. Future economic growth has not been calculated since 2016 ; it should now be reassessed in light of Brexit. We may not need this vast number of houses in this area ; how sad it would be to obliterate this lovely green space for ever on a false premise. EXCEPTIONAL CIRCUMSTANCES have not been fully evidenced or justified for the decimation of this stretch of Green Belt land. Flooding This site does NOT meet the National Policy with regard to flooding. The land in this part of Greetland provides an area for excess rainfall to settle as it courses down the hillside. Under the ground, in Greetland, is a complex natural water system of springs and streams. Once these are 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. If the water were not allowed to soak into this land, the effect, further down Black Brook towards West Vale and Elland would be devastating. The recent floods higher up the Calder Valley demonstrate that building homes in this area would be extremely foolish. Traffic - As Greetland is a semi-rural community, public transport is not frequent so most people rely on their cars. If over 600 houses are built in total, that would mean a potential 1200 extra cars on Saddleworth Road. The roads, particularly the two junctions at West Vale (which cannot be avoided) are unable to cope with the present volume of traffic at peak times. There is no space to alter these junctions in any way so extra traffic would cause massive hold ups. Congestion outside the two schools is already bad at either end of the school day ; with such a large increase in the population, the road would be impassable. Air Pollution - Extra traffic along Saddleworth Road will cause a huge increase in air pollution. This proposed development is close to Sunnybank Pre-School and Key Stage1 of Greetland Academy, so the extra traffic would pass within metres of a large number of children. The toxic air would be taken into vulnerable developing lungs, probably causing life-long health problems for the children in our community. Please see the open letter sent by the people of Greetland ; it describes the effect on the children clearly. Infrastructure - The infrastructure of the area cannot support 279 more families, let alone 600 if the whole of the proposed development is approved. We do not have capacity in the schools or the GP surgery. It is already impossible to register with an NHS dentist. Ecology - Along this stretch of Green Belt land there is an abundance of wild life ; fish amphibians, birds and small mammals. Not only will the air pollution affect them, but noise, human presence and light pollution. Added to this, the physical disturbance during the building phase ; this could lead to the loss of many of these creatures from the area FOR EVER. As we know, any change to our ecology can lead to unforeseen consequences in years to come. Open Space - Open space has many benefits to the community ; it is good for our mental and physical well-being. The footpaths in this area are well used by families, dog-walkers, bird watchers etc. Please do not deprive future generations of this wonderful resource. We do not want those pre-school children to look back when they are adults and say ' WHY DID THEY SACRIFICE THIS GREEN BELT LAND BACK IN THE 2020's?

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 **HRU1820**

Site ref (if applicable):

Person ID: **1245749**

Name: **Revd & Mrs Leslie &**

Organisation:

Kathleen Greenwood

Agent ID:

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

HRU1830

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

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:

Please see points below re objection to this application: 1 The houses at Ellistones already have problems with flooding with the water flowing off Saddleworth Road. 2 There is a pump to push the swerage up to the pipes on the main road and there have been problems with the pump on occasions. 3 The roads around the area cannot take much more traffic as in Greetland there always seems to be roadworks which take longer than intended. The work on the bypass has not helped with traffic nor will the next phase. 4 The area will require a new school and parking plus a new doctor's surgery! Where is all the water going to go which is running at the moment through the fields to the back at the bottom? If foundations are deep the water will find another route and there will be significant flooding in other 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 **HRU1833**

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

Person ID: **1246115**

Name: **Joanna 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. Calderdale council has a responsibility to rectify this and ensure this is done in fair, open, honest and transparent way. 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. When objections have been submitted they have been changed or vastly delays going on the system so no one can read them. I have tried to object on but have been unable to do so due to a number of error messages (one being -"the event is not currently available for consultation!??).

Do you consider the plan to be Sound?:

Sound Reason:

Infrastructure Traffic - There is already a significant issue with congestion in Greetland especially around the junction in West Vale. This includes traffic from Rochdale Road and Saddleworth Road. In rush hour it often takes over 20 minutes just to get through the traffic lights. Building any additional homes that will have little other option but to use this junction and this 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. In an area which has a high number of families, there is a school on each of the main roads (Rochdale and Saddleworth Road) and they are already heavy congested how can the council think adding any more traffic (never mind 600 houses worth) in one village is a logical decision? School ; Greetland infants is at full capacity 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 his grandchildren off at 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. 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 moved to Greetland as we wanted our children to grow up in the countryside alongside its amazing wildlife. I wanted to live close to my family but to support my mental wellbeing I wanted to be close to the open space/countryside. I often run along the wildlife corridor (during the summer months, when it is not boggy/flooded). There are many animals such as deer, hedgehogs, beavers, owls, herron and 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 Elland. With the current government commitments and the complex nature of the springs leading down the fields in Greetland how can turning these vast fields into concrete support and prevent the flooding which is regularly seen. The small area of land marked as flood plane already regularly goes into residents gardens, many roads all the way along from Saddleworth road are often more like streams with Gate house land and other areas being prone to flooding. The NPPF states no development is to be permitted on land that is liable to flood. With millions of tax payers money being spent on flood defences in the area which still don't prevent flooding how can any of this land be classed as not liable to flood (lots of photographic evidence over the years and this year of this across all 4 proposed sites) How can the prime minister commit to stop building in areas of high probability of flooding when the majority of Calderdale housing plan is in an area which regularly floods? The mitigation comments on the plans show a real lack of understanding and wider impact of the area

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 **HRU1836**

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

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 **HRU1837**

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

Person ID: **1246133**

Name: **A J Hoyle**

Organisation:

Agent ID:

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 is in green belt, the land is adjacent to the Black Brook, which floods on a regular basis, not least in the latest extensive flooding after Storm Chia. The proposed development to build 200 homes would create a significant problem in terms of the risk of flooding to houses already in existence in this area and further down into Westvale. Traffic congestion at both sets of Westvale traffic lights is a significant, daily, continual problem already causing difficulties for homes and businesses in the area and for those travelling through Westvale to other areas, including for the bus services. The proposed development would make a substantial addition to this. The infrastructure in terms of schools, GP surgery and dentists will not be able to absorb effect of the additional proposed 200 dwellings. The proposed area is a wildlife habitat with many species of birds and small mammals and this would adversely affect this biodiversity. The scale of the development represents urban sprawl and is disproportionate to the local area. I note that objections to the proposals must be listed individually. However, with the two proposed developments (LP0177 and LP0952) being adjacent to each other, I think that the proposals in terms of the number of dwellings, when added together, must be taken into consideration as a whole as they alone, without any of the other proposals for this area, amount to 446 houses, the impact on the area of which cannot be underestimated.

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 **HRU1844**

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 **HRU1848**

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

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 catastrophic consequences to the area of Greetland and surrounding villages. Including the properties of current residents living close to Black Brook.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5634586> ; <http://calderdale-consult.objective.co.uk/file/5634587> ; <http://calderdale-consult.objective.co.uk/file/5634585> ; <http://calderdale-consult.objective.co.uk/file/5634584>

Comment ID **HRU1853**

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

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 **HRU1859**

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

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?:

Sound Reason:

I am writing to object to the proposed development on the above site. The development of this site together with the planned development of sites LP0026, LP0952 and 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 **HRU1860**

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

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?:

Sound Reason:

The following applies to all the above sites equally: LP0177, LP0026, LP0952, LP1652 These areas are Greenbelt. This is sacred area to the local residents and is fantastic area to exercise for free, enjoy the open space, fresh air, spot wildlife, relax and get away from the stresses and strains of daily life. It is essential this is not taken away from residents including children to enjoy. This is a rural area and must remain so. There is no excuse for building on Greenbelt land. Does the Council realise this is a wildlife

corridor? Not just birds (which includes owls, kestrels and woodpeckers) there are deer, newts, bats, foxes, badgers, hares and all manner of animals live and roam here free in the knowledge they are safe, unharmed and treasured by locals. Their habitat cannot be destroyed and they cannot be safely moved without causing undue stress, anxiety and untold damage even death to these animals. They must also come before any development. All these sites are natural flood plains and do their job well of diverting water away from houses. This is Mother Nature's work and nothing man made can compete with this so it is essential these sites are left as they are. Where would the developer divert the water to? They would just divert it to cause devastation to other Greetland, West Vale, Elland and even Brighouse residents and businesses. Current residents and businesses must come first! Has the Council seen the videos and photos of all the flooding in these Greenbelt areas? These show just how unsuitable this land is and should be removed immediately. The solution is to identify suitable brownfield sites and also to include Barkisland, Stainland and Norland in the spread of the 600 houses, as that number is disproportionate to the number of houses currently in Greetland. Greetland residents will not take this lying down and Calderdale need to put their existing residents and wildlife first before any new development.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1868**

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

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:

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 **HRU1869**

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

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 **HRU1877**

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

Person ID: **1243588**

Name: **Mrs Kathryn Walsh**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

Site no LP0177 Adjacent Ellistones Place 1. Air/noise pollution from increased traffic, likely 2 cars per household. Proven that traffic fumes contribute to respiratory conditions. A probable 400 extra cars will severely impact on congestion of traffic in West Vale particularly at peak times. Junction of

Stainland/Saddleworth road will need major alterations 2.Flooding- Many springs in the Greetland hillside. Recent storms have caused many of these to alter course as wells have overflowed. Building on this land will cause further flooding down stream. As a resident of Saddleworth Rd for 35years we have had over the years problems with springs flowing onto our land and that of our neighbours. This has been owing to overflowing wells and collapsed land drains. The Council have only recently been involved in trying to rectify the problem as the water has been gushing into Saddleworth Rd, if the water was to freeze it would be highly dangerous. Building on the proposed site would cause major problems and the flooding in West Vale would be far worse than witnessed recently 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 **HRU1881**

Site ref (if applicable):

Person ID: **1246356**

Name: **Peter O'Kane**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I feel Calderdale Council has failed in its duty to inform residents of these plans and therefore given them little time to object.

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

Sound Reason:

I strongly object to any development on the above site. Greenbelt NPPF paragraph 143 states: - "inappropriate development is harmful to Greenbelt and should not be approved except in very special circumstances" I have seen no evidence from Calderdale Council to justify - "special circumstances" This area is a significant area for wildlife ; bats, owls, badgers, foxes, herons, etc. If we lose this area of Greenbelt land we lose the wildlife forever. Open green spaces are important for the physical and mental well being for all. Flooding As a resident of Saddleworth Road, I am well aware of the flooding which occurred in December 2015 and again in February 2020 and the devastation it caused local residents and businesses in the area. There are numerous natural springs in the hillside from Stainland, Barkisland and Greetland which run through this land. Should the land be developed where will this water go? It will move further down the valley causing flooding to other areas. The land is a natural flood plain and as such it should be left to do its job. Congestion The junction of Saddleworth Road/Stainland Road and Rochdale Road/Stainland Road is already significantly congested. Increasing housing will just exacerbate the ongoing problems with traffic congestion and pollution. Infrastructure Local schools are already full to capacity. The

local GP surgery would not cope with the extra patients. Urban Sprawl There is a risk that urban sprawl will further encroach into the surrounding countryside. This land in Greetland falls within the wider area of Elland and there is a disproportionate allocation to Greetland than other parts of the Elland region. Stainland having no housing allocation at all.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1893**

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

Person ID: **954524**

Name: **Mr M Brown**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

I wish to raise an objection to the proposed building of c600 homes in the Greetland / West Vale area (Saddleworth Road, references above). The objection is principally based on the following points:-
Planning, Infrastructure & Transport ; The current infrastructure in the area is already fully stretched with journey times and road capacity at significant levels. The plans have little to no capacity built in to accommodate the unprecedented increase in personal and commercial traffic that any approval would bring. The current road infrastructure could simply not cope. Any major increase in traffic would also bring significant road safety risks to the number of school children that walk through this area at peak times in the day. The combined residential capacity of the plans would bring turmoil to an already overcrowded, high-traffic area, commuter belt area of Calderdale. This is before consideration is even given to impacts on school capacities, doctor's appointments, etc in the area. Flooding ; Climate change projections strongly suggest we are going to experience more severe flooding in the future ; on this basis alone why suggest building on a naturally flood plain that allows fields to naturally flood, preventing damage to nearby homes and businesses? No amount of drainage solutions would alleviate this problem that naturally occurs in this valley. Building this amount of housing on a known flood plain that has very recently flooded (regardless of any provision for drainage) will only shift this known issue and cause unnecessary impacts on to other residents and businesses. Saving Green Belt ; This area was removed from the original plan due to this area being green belt land. Nothing has change over this time and the area continues to a wild life corridor for a variety of mammals, birds and insects. As a planet we cannot afford to lose any more of these habitats with plenty of brown or previous industrial land being available in the Borough for development. Air Quality & Pollution ; With having had 3 children already attend Greetland Academy off Saddleworth Road we've already felt first-hand the impacts of heavy commercial

traffic that use Saddleworth Road (Quarry above Scammonden Dam, Sonoco Paper Mill, etc) and the environmental impacts these have on the air quality in the area. This is in addition to the already large numbers of stationary traffic on around the traffic light junctions in West Vale. This number of homes with the significant number of cars this would bring would have damaging consequences to the air quality in the area.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1899**

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

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?:

Sound Reason:

Our main objections are due to the following: Flooding ; High Risk We can remember the severe flooding in the area of Ellistones Place and Woodfield Drive, Saddleworth Road, Greetland. We are extremely concerned that this will happen again, which it did on Sunday 9 th February 2020. Any proposed housing development in this area is a significant concern and is classed as a high-risk flood area. I have attached the evidence to support this. The proposed site DOES NOT meet national policy in regards to flooding. Lack of Infrastructure We are very concerned about the impact of any proposed housing development will have on Saddleworth Road and the volume of traffic. Traffic does build up each day in particular at West Vale lights. Traffic comes from the Greetland residents and also Barkisland, Ripponden, Norland, stainland. The volume of traffic is already at its peak taking us 10-15mins at peak times to get out of west vale to travel to work. Any proposed housing development would have a significant effect with the increase of the number or cars on the road in Greetland (e.g. 600 houses, most people nowadays have up to two cars per household). This is a grave concern for us and not only having a massive impact on air pollution and air quality in this area. Having young children this is a massive worry for us. We don't want more pollution ; if anything we want less pollution. We also concerned about the impact the development would have on Greetland Academy ; which is currently at full capacity. Residents ideally want their children to go to their local school ; its going to make less places available and this will have an impact whereby parents will have to drive further to different schools, hence again more air pollution. The local GP Surgery will not be able to sustain its service with an increased number of residents coming into the area. There is also currently a national shortage of GPs and Nurses across the country. The GP Surgery would have to review whether they could register the large volume of new patients to the area. The proposed development would also

impact the local Dentist and whether they could accommodate new patients. Wildlife Corridor The proposed site will have a massive impact on the wildlife in the local area. There are sited owls, squirrels, bats, foxes, insects and birds in this area. This would go against your Environmental Plan in terms of protecting Green Belt and allowing wildlife to flourish and continue. Greenbelt Land According to Paragraph 80 of the NPPF Green Belt serves 5 purposes: To check the unrestricted sprawl of large built up areas. To prevent neighbouring towns merging into one another. To assist in safeguarding the countryside from encroachment. To preserve the setting and special character of historic towns To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The proposed development would contravene against the 5 Green Belt functions. This is very concerning and should be brought to your attention. Of the 17 Sustainability Assessments this allocation has 11 uncertain assessments and 4 negative assessments. This site was refused planning permission also in July 2019.

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/5629159>

Comment ID **HRU1907**

Site ref (if applicable):

Person ID: **1242976**

Name: **Mrs Lesley Pollacco**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

I am writing to object to the proposed plans for all of the above sites based on the following: - Objective 2 - TO IMPROVE SAFETY AND SECURITY FOR PEOPLE AND PROPERTY - This development will not improve this SA as there is no local police station or fire station as these have recently closed down. Increased traffic will increase the risk of RTAs. Property will be negatively effected due to the very high risk of flooding due to building on a Flood Plain. Objective 3 TO CREATE AND RETAIN HEALTHY VIBRANT AND INCLUSIVE COMMUNITIES. Increased traffic and traffic jams along Saddleworth Rd from West Vale up to and past Sunnybank Primary School at peak times (at the start and end of the school day) will have a negative effect on air quality and a likely increased rise in breathing related illnesses. Both local GP surgery's are oversubscribed. Journey time to the town centre at peak times is already around 30-40 minutes. This development will only increase these times. Local primary and secondary schools are already full and 600 houses could result in an extra 40 pupils per year group, therefore pupils will have to travel outside of the area for their educational needs leading to a divisive community and further impacting on road travel. Objective 4 TO 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 5 TO 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 7 TO 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 8 TO 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 9 TO 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 10 TO 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 11 TO 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 **HRU1913**

Site ref (if applicable):

Person ID: **956078**

Name: **Mrs Pauline Hill**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

As a resident of Greetland for the past 69 years I am mortified at the prospect of the proposed drastic changes to the previously agreed Calderdale Local Plan for the following reasons. Green Belt Our Green Belt in Greetland is at the heart of the community and there is not much of it left. If these spaces are taken then they are gone forever. The government attaches great importance to Green Belts and stipulates the Green Belt should only be built on in exceptional circumstances . (Refer to Section 13 of the NPPF .) We

have sufficient brownfield sites within Greetland providing they are used to accommodate the needs of our local community and to support our local economy and would ask that all 4 of the sites on the Green Belt be removed. How will the council replace our green spaces? I also object to the planning application 18/01189/FUL as this particular site would meet the needs of our local people subject to revised plans. Flooding Flooding is a major problem all along the Green Belt along side Black Brook. The fields were extensively flooded during the storms 8th/9th February 2020 yet again with flood water spilling over into the gardens and almost into the houses of Woodfield Drive. The water was too deep to even walk in and the river bank was totally cut off. The water was rushing into these fields at a terrible and frightening pace and you could not even see the boundary walls. To think that houses could be build on this land is completely outrageous (LP0177). This land has flooded all my life as my parents used to take us down to look when we were children. Do we not have enough flooding, Calderdale have declared a climate emergency? Flooding is extreme and frequent. Wildlife Any development would decimate this Wildlife corridor. There is an abundance of wildlife, herons, owls, many different species of birds, pheasants, bats, frogs, ducks and many more. This is a very valuable part of our environment. There would be an increase in the air pollution, noise, vibration and of course human presence. This Green Belt with all the nature and wildlife should be protected. We need these green spaces for our health they are well used. The wildlife corridor could not survive a major development and is also a flood plain. Traffic and Air Pollution The traffic on Saddleworth Road is becoming almost unbearable especially at peak times. I have lived on Saddleworth road for 67 years and cannot hardly get out of my driveway onto Saddleworth Road due to the amount of traffic. This is only a B road. There is also an increased amount of parked cars on the roadside which makes it even more difficult to navigate. Traffic also comes down from Barkisland and Ripponden. Should more houses be built there would be an increase of at least 1200 more cars as nearly every household has at least 2 cars if not 3 or 4. With the amount of traffic on this road I no longer feel safe walking to West Vale. Traffic is regularly at a standstill on Saddleworth road as the road cannot cope with the amount of traffic that use it. West Vale is consistently congested. We need the air quality in our area testing. We cannot support a huge rise in concentrated air pollution. We have to think of the health of the children and the wider community. Infrastructure Without major adjustments these plans would result in urban sprawl and would have a drastic impact on traffic, schools, GP and Dental Practices. Is it not the governments priority to improve air quality and retain open green spaces. This being essential for our health and wellbeing? If the houses are built on the brownfield sites then I do not object and accept that there may be a need for more housing. It has to be the right housing in the right places. Please make sure all the brownfield sites have been used before trying to take our Green Belt and Wildlife away from us. Attached are pictures from last weeks flooding. As I am writing this the fields are about to be flooded again.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5631975> ; <http://calderdale-consult.objective.co.uk/file/5631974>

Comment ID **HRU1921**

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 **HRU1926**

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 **HRU1943**

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

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?:

Sound Reason:

Ref: Objection to the following Sites: LP0026 LP0177 LP0952 LP1625 To whom it may concern, We

therefore expect this letter / email to be classed as official comment on the above 4 sites. The reasons for our opposition are as follows: 1) Disproportionate amount of building in the Greetland area . The revisions to the plan (i.e. the addition of the new sites) proves further unsustainable development with a disproportionate amount of new homes proposed across four sites in Greetland, with 1,041 additional units of the 1,708 on new housing sites within Calderdale (over 60%) proposed in the 'Elland' area. The way in which Greetland has been bundled in with other wards creates a misleading representation of the area. It is a village, not a town, why has it been included in Elland and why have other areas eg Stainland had zero land allocated? Ripponden and Rishworth are not included within Sowerby bridge or combined with a town, and therefore are represented in a fair way, which Greetland is not. Why is Greetland set out in such a way to disguise the how disproportionately the land in the local plan has been allocated? 2) Flood areas This affects the whole area. The proposed developments are situated within the flood plain of the Black Brook and are also subject to surface water flooding from the run-off from the steep hillside of the valley. This has been demonstrated very clearly at the beginning of February 2020 following Storm Ciara & storm Dennis. The Environment Secretary has stated that extreme rainfall events such as this will become more frequent as a consequence of climate change. Therefore, flood plains will become ever more important to -"slow the flow"- and reduce the peak river levels further downstream. To build houses here is inappropriate both at a very local level and further afield. Development here on site LP 0177 will result in additional surface run off, which contributes to additional flooding. The fields currently act as a natural flood defense. If new development is related to causing flooding to existing properties, like the houses on Woodfield Drive, the development does not comply with NPPF policy. We need to question the Council's Sustainability Appraisal process to support the release of the new sites with the site at 'Land adjacent Ellistones Place' (Ref: LP0177). This appears to be a completely unjustified recommendation. The site report states that the assessment of SA7 is 'Negative' and marked 'RED' commenting that "Overall the impact is negative as the site is greenfield and lies within flood zones 2 and 3". Based on this information this site should be excluded, and Calderdale has declared a climate emergency. 3) Sustainable development & Infrastructure: The function of the planning system/process is to facilitate sustainable development that makes a positive contribution to the environment. It is not the role of the Council to release demonstrably unacceptable sites within the Green Belt to meet a housing target. The existing infrastructure is not adequate to support the development on this site or at others identified within the local plan. The chronic congestion already experienced in West Vale cannot be remedied and Calderdale Council have already admitted all they can do is change the traffic light sequence. This junction is already running at over 100% capacity. More bus stops and a train station proposed in Elland will not remedy this congestion as more proposed homes will mean more people commuting. Traffic from wider areas will have to come through West Vale to get to the new flyover proposed to join the A629 Elland by-pass to reach the station. Therefore the proposed 600 houses to be built on Saddleworth Rd will cause huge problems for not only residents of Greetland but also surrounding areas. It has been reported by WSP Parsons Brinkhoff Report on Transport Network that the traffic congestion at the junction of Stainland Rd/Saddleworth Rd would increase by approx 105% and that the junction of Stainland Rd/Rochdale Rd would increase by 100%. As West Vales lies at water level this congestion will increase air pollution to health damaging levels and taking into consideration there is a school only a little way up from the junction in West Vale on Saddleworth Rd, the impact to their health will be catastrophic as the school is very near the road. It must also be taken into consideration that majority of the roads in the ward are very narrow. Scar Bottom Lane and Brian Royd being case in point. Only very small buses can travel on these roads and they are limited as to how many people they can accommodate. Putting more buses on will just increase air pollution and congestion. There currently is no space at doctor and dental surgeries in the area. Similarly the additional housing proposed will be designed with families in mind, and there is insufficient capacity at local schools. There are extremely limited public transport services in the area. 4) Greenbelt land The greenbelt is highly sensitive, due to the wildlife corridor and the way in which it acts as a natural flood defense. The public right of way runs through this stretch of greenbelt and provides the local community free access for leisure and recreation. Why has this been left in the plan when Stainland, on high ground which does not have

flooding issues has been saved from the local plan? The development here in Greetland will have much greater harm due to the flooding. A labyrinth of underground springs already cause small scale developments problems. The Greenbelt is protected land which is designed to prevent urban sprawl and towns merging into one entity. Greetland and Barkisland are villages if building on the Greenbelt takes place, then there will be no distinction between them. There is no valid reason to destroy this Greenbelt land when there are brownfield sites available in the area for development. There are many mature trees on the site that need to be protected, as well as the visual amenity, these trees reduce pollution, stabilise the land reducing erosion caused by surface water at times of heavy rain. This area of greenbelt is home to numerous species of wildlife - deer, dippers, bats and countless species of insects. The wildlife & Countryside Act (as amended)1981, The Conservation (Natural Habitats &c) Regulations 1994 and the Countryside & Rights of Way (CROW) Act 2000 are all being contravened by including this site back into the Local Plan for development. Although the Calderdale Council's Senior Planning Officer recently stated at a Local Plan Meeting that they had saved much Greenbelt, the fact is they have proposed to build on even more Green Belt in Greetland than on the previous agreed Local Plan. Indeed the inclusion of sites in Greetland including site LP0026 is the majority of Greetland's existing Green Belt. Esther McVey, the current Housing Minister's written policy on Green Belt land states -“protecting the Green Belt goes beyond protection against development”and -“Greenfield sites should not be what we turn to, not what we look at first. Every blade of grass must be looked at before it is changed.”In conclusion, all other issues which have been flagged and some highlighted by the council itself STILL remain.... Traffic impacts Air pollution Infrastructure Flooding They all just add to the fact that the proposed plan is not sustainable in NPPF terms. When the harm identified is taken into account then the proposed plans do not amount to sustainable terms. We look forward to hearing your response,

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1950**

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

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 become more frequent as a consequence of climate change. Therefore flood plains will become ever more important to -"slow the flow" and reduce the peak river levels further downstream. To build houses here is inappropriate both at a very local level and further afield. Development here on site LP 0177 will result in additional surface run off, which contributes to additional flooding. The fields currently act as a natural flood defense. If new development is related to causing flooding to existing properties, like the houses on Woodfield Drive, the development does not comply with NPPF policy. We need to question the Council's Sustainability Appraisal process to support the release of the new sites with the site at 'Land adjacent Ellistones Place' (Ref: LP0177). This appears to be a completely unjustified recommendation. The site report states that the assessment of SA7 is 'Negative' and marked 'RED' commenting that "Overall the impact is negative as the site is greenfield and lies within flood zones 2 and 3". Based on this information this site should be excluded! Let's not forget Calderdale have declared climate emergency! 3) Sustainable development & Infrastructure: The function of the planning system/process is to facilitate sustainable development that makes a positive contribution to the environment. It is NOT the role of the Council to release demonstrably unacceptable sites within the Green Belt to meet a housing target. The Inspector's letter of 16 July 2019 to the Council notes (Para. 14) that "Local Plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits". This is exactly the case in here in Calderdale. Later, where the Inspector asked the Council to review the option of 'the supply of more suitable and available sites elsewhere', however, the further work on the additional sites considered (incorrectly by the Council) to be 'suitable and available' are not, in fact, suitable nor available, and in any case it has been revealed that this option is simply not sustainable. Why are local brownfield sites not being used as part of the plan. The existing infrastructure is not adequate to support the development on this site or at others identified within the local plan. The road network is already operating at capacity and frequently backs up at Saddleworth Road and Stainland Road at peak times, additional traffic from the development will only exacerbate this problem further. The queuing traffic will lead to increased levels of pollution, which is of particular concern at the Greetland school site which is situated at a lower level than the road. There

currently is no space at doctor and dental surgeries in the area. Similarly the additional housing proposed will be designed with families in mind, and there is insufficient capacity at local schools. There are extremely limited public transport services in the area. 4) Greenbelt land The greenbelt is highly sensitive, due to the wildlife corridor and the way in which it acts as a natural flood defense. The public right of way runs through this stretch of greenbelt and provides the local community free access for leisure and recreation. Why has this been left in the plan when Stainland, on high ground which does not have flooding issues has been saved from the local plan? The development here in Greetland will have much greater harm due to the flooding. A labyrinth of underground springs already cause small scale developments problems. The Greenbelt is protected land which is designed to prevent urban sprawl and towns merging into one entity. Greetland and Barkisland are villages if building on the Greenbelt takes place, then there will be no distinction between them. There is no valid reason to destroy this Greenbelt land when there are brownfield sites available in the area for development. There are many mature trees on the site that need to be protected, as well as the visual amenity, these trees reduce pollution, stabilise the land reducing erosion caused by surface water at times of heavy rain. This area of greenbelt is home to numerous species of wildlife - deer, dippers, bats and countless species of insects. The wildlife & Countryside Act (as amended)1981, The Conservation (Natural Habitats &c) Regulations 1994 and the Countryside & Rights of Way (CROW) Act 2000 are all being contravened by including this site back into the Local Plan for development. Although the Calderdale Council's Senior Planning Officer recently stated at a Local Plan Meeting that they had saved much Greenbelt, the fact is they have proposed to build on even more Green Belt in Greetland than on the previous agreed Local Plan. Indeed the inclusion of sites in Greetland including site LP0026 is the majority of Greetland's existing Green Belt. Esther McVey, the current Housing Minister's written policy on Green Belt land states -"protecting the Green Belt goes beyond protection against development" and -"Greenfield sites should not be what we turn to, not what we look at first. Every blade of grass must be looked at before it is changed." In conclusion, all other issues which have been flagged and some mitigated by the council itself STILL remain.... Traffic impacts Air pollution Infrastructure Flooding They all just add to the fact that the proposed plan is not sustainable in NPPF terms. When the harm identified is taken into account then the proposal do not amount to sustainable terms. I look forward to hearing your response,

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1955**

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

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:

We are writing to express our opposition to the above sites as listed on the Calderdale Council planning portal. Calderdale Council have not made all residents in the area aware of the need to submit new objections to the updated plan and that these must be submitted in good time. They have a responsibility to the residents and public in general to be open and transparent and this has not been the case, nor is the process to object easy or straight forward. We therefore expect this letter / email to be classed as official comment on the above 4 sites. The reasons for our opposition are as follows: 1) Disproportionate amount of building in the Greetland area . The revisions to the plan (i.e. the addition of the new sites) is unsustainable development with a disproportionate amount of new homes proposed across four sites in Greetland, with 1,041 additional units of the 1,708 on new housing sites within Calderdale (over 60%) proposed in the 'Elland' area. The way in which Greetland has been bundled in with other wards creates a misleading representation of the area. It is a village, not a town, why has it been included in Elland and why have other areas eg Stainland had zero land allocated? Ripponden and Rishworth are not included within Sowerby bridge or combined with a town, and therefore are represented in a fair way, which Greetland is not. Why is Greetland set out in such a way? This does not show how disproportionately the land in the local plan has been allocated? 2) Flood areas This affects the whole area. The proposed developments are situated within the flood plain of the Black Brook and are also subject to surface water flooding from the run-off from the steep hillside of the valley. This has been demonstrated very clearly at the beginning of February 2020 following Storm Ciara & storm Dennis. The Environment Secretary has stated that extreme rainfall events such as this will become more frequent as a consequence of climate change. Therefore, flood plains will become ever more important to -"slow the flow" and reduce the peak river levels further downstream. To build houses here is inappropriate both at a very local level and further afield. Development here on site LP 0177 will result in additional surface run off, which contributes to additional flooding. The fields currently act as a natural flood defense. If new development is related to causing flooding to existing properties, like the houses on Woodfield Drive, the development does not comply with NPPF policy. We need to question the Council's Sustainability Appraisal process to support the release of the new sites with the site at 'Land adjacent Ellistones Place' (Ref: LP0177). This appears to be a completely unjustified recommendation. The site report states that the assessment of SA7 is 'Negative' and marked 'RED' commenting that "Overall the impact is negative as the site is greenfield and lies within flood zones 2 and 3". Based on this information this site should be excluded, and Calderdale has declared a climate emergency. 3) Sustainable development & Infrastructure: The function of the planning system/process is to facilitate sustainable development that makes a positive contribution to the environment. It is not the role of the Council to release demonstrably unacceptable sites within the Green Belt to meet a housing target. The existing infrastructure is not adequate to support the development on this site or at others identified within the local plan. The chronic congestion already experienced in West Vale cannot be remedied and Calderdale Council have already admitted all they can do is change the traffic light sequence. This junction is already running at over 100% capacity. More bus stops and a train station proposed in Elland will not remedy this congestion as more proposed homes will mean more people commuting. Traffic from wider areas will have to come through West Vale to get to the new flyover proposed to join the A629 Elland by-pass to reach the station. Therefore the proposed 600 houses to be built on Saddleworth Rd will cause huge problems for not only residents of Greetland but also surrounding areas. It has been reported by WSP Parsons Brinkhoff Report on Transport Network that the traffic congestion at the junction of Stainland Rd/Saddleworth Rd would increase by approx 105% and that the junction of Stainland

Rd/Rochdale Rd would increase by 100%. As West Vales lies at water level this congestion will increase air pollution to health damaging levels and taking into consideration there is a school only a little way up from the junction in West Vale on Saddleworth Rd, the impact to their health will be catastrophic as the school is very near the road. It must also be taken into consideration that majority of the roads in the ward are very narrow. Scar Bottom Lane and Brian Royd being case in point. Only very small buses can travel on these roads and they are limited as to how many people they can accommodate. Putting more buses on will just increase air pollution and congestion. There currently is no space at doctor and dental surgeries in the area. Similarly the additional housing proposed will be designed with families in mind, and there is insufficient capacity at local schools. There are extremely limited public transport services in the area. 4) Greenbelt land The greenbelt is highly sensitive, due to the wildlife corridor and the way in which it acts as a natural flood defense. The public right of way runs through this stretch of greenbelt and provides the local community free access for leisure and recreation. Why has this been left in the plan when Stainland, on high ground which does not have flooding issues has been saved from the local plan? The development here in Greetland will have much greater harm due to the flooding. A labyrinth of underground springs already cause small scale developments problems. The Greenbelt is protected land which is designed to prevent urban sprawl and towns merging into one entity. Greetland and Barkisland are villages if building on the Greenbelt takes place, then there will be no distinction between them. There is no valid reason to destroy this Greenbelt land when there are brownfield sites available in the area for development. There are many mature trees on the site that need to be protected, as well as the visual amenity, these trees reduce pollution, stabilise the land reducing erosion caused by surface water at times of heavy rain. This area of greenbelt is home to numerous species of wildlife - deer, dippers, bats and countless species of insects. The wildlife & Countryside Act (as amended)1981, The Conservation (Natural Habitats &c) Regulations 1994 and the Countryside & Rights of Way (CROW) Act 2000 are all being contravened by including this site back into the Local Plan for development. Although the Calderdale Council's Senior Planning Officer recently stated at a Local Plan Meeting that they had saved much Greenbelt, the fact is they have proposed to build on even more Green Belt in Greetland than on the previous agreed Local Plan. Indeed the inclusion of sites in Greetland including site LP0026 is the majority of Greetland's existing Green Belt. Esther McVey, the current Housing Minister's written policy on Green Belt land states -"protecting the Green Belt goes beyond protection against development"and -"Greenfield sites should not be what we turn to, not what we look at first. Every blade of grass must be looked at before it is changed."In conclusion, all other issues which have been flagged and some highlighted by the council itself STILL remain.... Traffic impacts Air pollution Infrastructure Flooding They all just add to the fact that the proposed plan is not sustainable in NPPF terms. When the harm identified is taken into account then the proposed plans do not amount to sustainable terms. We look forward to hearing your response,

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1961**

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

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 **HRU1995**

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 Our Client's site at Saddleworth Road, Greetland was previously identified as a preferred housing site within the Local Plan Initial Draft. It was then removed from the Publication Draft Plan due to the Council reducing its housing requirement. The site is now

proposed as an additional site allocation within the current consultation which we fully support. The site is suitable and available for the development of up to 200 new homes within a highly sustainable location. The site represents a suitable location for new residential development and is a mix of brownfield and greenfield land. It is located within walking distance of existing bus services along Saddleworth Road, with access to Halifax and Huddersfield. Greetland itself benefits from local facilities and services including a medical centre, library, community centre, churches, pubs and convenience stores. Elland town centre is located approximately 2.6km from the site which provides further retail, leisure and businesses services. The site is situated within a predominantly residential area, with dwellings along the north side of Saddleworth Road, opposite the site's frontage. It benefits from strong defensible boundaries and there are no technical or environmental constraints that would preclude the development of the site.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5632467>

Comment ID **HRU2001**

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

Person ID: **1246546** Name: **J Taylor** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

the Local Plan, I would like to object strongly against the development on the following grounds:- The great increase in traffic flow along Saddleworth Road with the consequent traffic at the West Vale traffic lights and the increased air pollution in the vicinity of the Greetland Academy School. As a retired professional biologist I am aware of the benefits to the local community and the above school, of the preservation of the wildlife along the Black Brook corridor. The increased pressure on local amenities such as school places and local doctor surgery availability would be total unviable. As a local resident in the adjacent area, living alongside Saddleworth Road for the past forty years, I am well aware of the seasonal flooding in the area of the proposed development. Evidence of serious flooding and the consequences, e.g the Calder Valley, indicate the dire result of possible flooding. I trust my objections to the proposed housing development will be viewed seriously and would welcome the opportunity to air my views personally with representatives supporting the development.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2006**

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

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 **HRU2049**

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

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 **HRU2053**

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

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?:

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 **HRU2059**

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

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 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 **HRU2068**

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

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 **HRU2071**

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

Person ID: **1246744**

Name: **Mr Steven Reed**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I do not believe the plan to build on site LP0177 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 LP0177 should be removed from the Local Plan. The inclusion of this site suggests that the plan has not been properly prepared and is not in-line with national policy, and can therefore not be justified. 'Exceptional circumstances' to change the classification site LP0177, making it eligible for development do not exist, and the circumstances have not been satisfied. There is no evidence to suggest that thorough assessment, investigation or consultation to suitable brownfield sites has taken place. 'Lack of developer interest' has not been listed as valid reason that warrants the exclusion of a brownfield site from the Local Plan. The consultation has been lacking in clarity and honesty. Re-entering site LP0177 into the Local Plan without final scrutiny from Calderdale Councillors representing the Greetland and Stainland ward, and without pre-consultation engagement is not transparent. I also believe that labelling site LP0177 as being part of Elland is also very misleading, given that Elland is a completely separate conurbation with has separate identifiable amenities and postcode, and elected representatives. This demonstrates that the plan has not been positively prepared. Lack of adherence to national policy and legislation on flooding makes the plan unjustifiable, given that the development does not pass the 'exception test' (NPPF: 2019); the development is not only at risk of flooding, but without further assessment cannot be ruled out from putting other communities at risk of flooding in the future. No evidence exists to show to show that site LP0177 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. I do not believe the plan to be sound, and reference: National Planning Policy Framework: 2019, paragraphs 133, 134, 155 - 165, 181 Government White Paper 'Fixing Our Broken Housing Market' WSP Parsons Brinckerhoff Report Calderdale's Vision 2024 Strategy Site LP0177 should be removed from the Local Plan for the following reasons: The inclusion of this site inclusion demonstrates that the plan has not been accurately prepared, cannot be justified, and is not consistent with national policy. I make these statements with reference to the National Planning Policy Framework: 2019: 'Exceptional circumstances' for development on LP0177 Local Plan have not been satisfied. Full examination of other sites has not been evidenced. The possibility of building on Brownfield sites, or increasing the density of other existing sites has not been thoroughly examined. Evidence of any thorough investigation of altering the greenbelt's boundary is lacking. Development of site LP0177 would create urban sprawl, and the reduction of open space that this would lead to contravenes the established purpose of the greenbelt. For these reasons the plan is not sustainable. There is an existing need to reduce the chronic congestion in West Vale, and this proposed development would neither reduce traffic nor alleviate existing issues it raises. No evidence exists as to how the increase in traffic through West Vale's already very busy junctions would be managed, so the existing situation would be worsened rather than improved by the development. The mooted creation of a new train station in the neighboring town of Elland would not reduce congestion in this area, but rather put more strain on the current road network due to increased traffic through the area, given that people would drive to the station and park their cars there, given that there are no other train stations in Calderdale's lower valley other than Brighouse, which is over three miles away. For these reasons the development is not sustainable. Declaration and the need to respond proactively to the Climate Emergency declared by Calderdale Council must override the need to develop site LP0177, due to the importance of the needs for clean air management and the creation of clean air zones. Increased emissions from the cars of people who will reside in the development proposed for this greenbelt site does not support the clear air management strategy. This further demonstrates that the plan is not sustainable. Classification of site LP0177 making it a Class 1 Flood Risk should be reviewed. There is no evidence to show that site LP0177 will not be needed in future flood prevention or alleviation schemes. The impact of climate change cannot be accurately assessed until thorough analysis on the impact of the February 2020 floods has taken place. No evidence has been presented to prove that the site can be safeguarded from flooding in the future nor

that the development will not increase the risk of flooding in other communities along the River Calder. Without review of Calderdale's Flood Management Strategy, Calderdale Council cannot state that the plan is sustainable. Lower flood risk sites are available in neighbouring areas, and these, including brownfield sites unaffected by recent flooding, should be examined and considered for development ahead of site LP0177. There is no evidence to demonstrate that this investigation has taken place. Justification Financial forecasting used to determine the number of houses is not sound and should be revised. It has not been positively prepared, is not justified, and is not consistent with national policy: the additional number of houses added into the plan between October 2019 and January 2020 were added to due feedback from the inspector, it was not Calderdale Council's original desire to build so many houses, meaning the figure has been created to fit a target rather than to cater to an actual need. The financial forecast should now be reviewed in light of unplanned expenditure resulting from the February 2020 flood recovery project, and in turn reduce the number of houses required. Moreover, the economic forecast could not reliably forecast the impact of leaving the European Union as the date of leaving had not been determined when the forecast was made. The reasons cited above are a demonstration of why LP0177 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 **HRU2076**

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 **HRU2082**

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

Person ID: **1243337**

Name: **Mrs Nicola Reed**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Do you consider the plan to be legally compliant for site LP0177? No - I do not believe the plan to be legally compliant for the following reasons: "Exceptional circumstances" to exclude LP0177 from the GreenBelt do not exist - the plan has not been positively prepared, cannot be justified, and is not consistent with national policy. National Planning Policy Framework: 2019, p 137 & the Government White Paper "Fixing Our Broken Housing Market: 2017" state that criteria must be satisfied when a greenfield site is to be exempt from GreenBelt policy: by changing the boundaries of the site so that development can take place. 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 substitute LP0177 from the Local Plan. "Lack of developer interest" is not listed as a valid reason exclusion of a brownfield site from the Local Plan in either the National Planning Policy Framework: 2019, or the Government White Paper "Fixing Our Broken Housing Market". Lack of community consultation Lack of honesty and transparency has been shown by re-entering site LP0177 into the Local Plan without scrutiny from Ward Councillors. Inclusion of site LP0177 has taken place with pre-consultation engagement with the public. Lack of clear communication Site LP0177 is not part of Elland. Elland is a town in its own right. Labelling the site as Elland is misleading. Elland has its own amenities and separate postcode. This makes the Local Plan document unclear and misleading. The "Calderdale Statement of Community Involvements: 2015: 1.2" calls for information to be communicated in a clear and concise manner. The principles set out in the document have not been

adhered to. Lack of adherence to current policy and legislation on flooding According to the National Planning Policy Framework: 2019, paragraphs 155 to 165, developments should not take place in flood risk areas, where permission is granted (because the exception test is passed), the development should not pose a harmful effect on other settlements putting them at risk of flooding. Global warming is being recognised as a contributing factor to increasing flooding across Britain. The landscape of Calderdale makes the area particularly susceptible to flooding. There is no evidence to show that the insertion of site LP0177 in the Local Plan will not put other areas of Calderdale at risk of flooding given that several other towns/communities lay along the River Calder. Thorough investigation work following the floods on 09 February 2020 need to be completed to assess to amend and update existing flood prevention plans.

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 insertion of LP0177, into the Local Plan have not been satisfied. Strategy makers must fully examine all reasonable options before a site is included in the Local Plan, there is a lack of evidence to show this has been done. Consideration of brownfield sites or increasing the density of other has not been fully examined. The criteria set for moving greenbelt boundaries as described in the National Planning Policy Framework: 2019, p 137 has not be met and therefore justification of inclusion of this site is not available. As the exceptional circumstances to change the GreenBelt boundary do not exist further review of the purposes of greenbelt land are necessary. As per the National Planning Policy Framework: 2019, paragraphs 133 and 134 development of site LP0177 would create "urban sprawl". This does not uphold the importance of keeping open and accessible spaces. Current chronic congestion in West Vale would not be reduced. The National Planning Policy Framework: 2019, paragraph 102 says that developments must prevent negative effects a development would have on transport infrastructure. Evidence to show that congestion in West Vale would be reduced as a outcome of building at site LP0177 is lacking; rather the situation would be made worse. Congestion at both Stainland Road/Saddleworth Road and Rochdale Road/Stainland Road would increase (WSP Parsons Brinckerhoff Report). This shows that an adjustment to the traffic light system in West Vale would not ease traffic should take place, nor fix the problems already being experienced. The project to create a train station in Elland will not reduce congestion; commuters will need to travel through West Vale to access the station, putting more stain on the road network. The infrastructure around site LP0177 will be unable to cope with the development of LP0177. Lack of infrastructure shows that the plan is unsustainable and is not supported by the National Planning Policy Framework: 2019. The need to respond to the Climate Emergency in Calderdale overrides the need to development site LP0177: The importance of clean air management and creation of clean air zones are set out in the National Planning Policy Framework: 2019, paragraph 181. The Council has announced a climate emergency across Calderdale and taking steps to improve the road network to reduce the effects of car emissions. The urban sprawl created by development at site LP0177 would mean an increased number of vehicles travelling along Saddleworth Road and through surrounding road junctions. The chronic congestion in HX4 will be aggravated by any development at site LP0177, this shows that the Local Plan is not sustainable. Classification of site LP0177 should be reviewed, making it a Class 1 Flood Risk area. The need for this flood in future flood prevention management schemes cannot be ruled out as the impact of climate change and its relationship with the Borough is yet to be fully realised: Paragraphs 155 to 165 of National Planning Policy Framework: 2019 say that building in flood risk areas or where a development may have a mounting impact upon local areas which are at the mercy of flooding should be avoided. Developments need to be made safe for their lifespan, safeguarding them and other areas against flooding. The National Planning Policy Framework says that where development takes place in flood risk areas the exception tests must be passed. This test has not been passed as the benefits of building on site LP0177 are not outweighed by the risks posed to other areas. It is acknowledged that flooding will become increasingly widespread and numerous locally because of the unique features of the Calderdale landscape.

Development on site LP0177 contravenes paragraphs 155 to 165 of the National Planning Policy for a number of reasons: Impact the development would have on other areas of Calderdale is unknown, thorough analysis of the 09 February 2020 floods needs to take places in Elland and Brighouse (River Calder settlements). The Authority cannot state that the houses on site LP0177 will be safeguarded against flooding without thorough assessment and advice from The Environment Agency. The impact of flooding in February 2020 has not yet been fully analyzed. The Strategic Flood Management Strategy should be reviewed and the Local Plan amended accordingly before site LP0177 can be excluded from being needed in future flood prevention schemes. Lower flood risk sites are available within Greetland and should be considered for development ahead of site LP0177. Development of site LP0177 will not provide sustainable benefits to the immediate or wider area which outweigh risks posed to settlements along the River Calder. Loss of GreenBelt & Wildlife Corridor Building on the GreenBelt site LP0177 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 LP0177 conflicts with the purposes of GreenBelt land as laid on the National Planning Policy Framework: 2019. The importance of creating a place where people and places flourish is a staple of Calderdale Vision 2024 Strategy. The loss of open space and creation of urban sprawl would negatively impact upon the wellbeing of residents and people visit the area. Declassification of greenfield land must be offset with compensatory enhancements to an environment's accessibility and quality (National Planning Policy Framework: 2019). Destruction of an area a wildlife habitat to recreate elsewhere seems ill advised. Additional traffic from the site would stress existing road networks, not improve them. 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 in light of unplanned expenditure resulting from the February 2020 flood recovery project, and in turn reduce the number of houses required. Moreover, the economic forecast could not reliably forecast the impact of leaving the European Union as the date of leaving had not been determined when the forecast was made. 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 **HRU2093**

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

Person ID: **1129718**

Name: **Mr Malcolm James**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

I wish to object to the proposed revised version of the Local Plan and these comments relate to the sites LP0952, LP1625, LP0177 and LP0026. I understand these have been added by the Council to meet a need presented by the inspector. In simple terms the economic objectives proposed by the Council were not supported by enough new housing in the area to support the increased population, which in part is thought would be attracted by the increased work opportunities. Thus it is a case of amending the economic profile or adding housing to meet an envisaged demand. The core of my objection to these additional sites is based on the numbers used in developing the original concept. There was a projection of a nett employment increase in the area of 8,295 jobs. The period concerned covers 2016 to 2032. Several elements of this figure seem to me to hold no logic at all. I will give several examples from the chart provided for the evaluation of the economic development. An estimated increase of 898 jobs in the combined retail and wholesale. Calderdale is not a location where large distribution facilities will be built. The geography and roads do not attract this activity which is evident by the almost total absence now of these companies. Retail in the towns of Calderdale are not likely to see any growth, holding the present job total would be considered a success. Health, not including care of the elderly, and residential care homes, shows an increase of 902 jobs. I am not certain of the present figure but I do know that about 4 years ago the local Hospital Trust were confident that they could reduce their non-medical staffing total by a rather similar figure based on new technology and greater efficiency of the analytical procedures of testing processes. This was never proved to be the case and thus the additional employment in this area is suspect particularly that the work was split between Calderdale and Huddersfield. Public services shows an expected increase of 3183 jobs. This I am sure will cover the range of such work as prevails in the public sector now. I find it difficult to believe that such a dramatic increase will occur in these years rather improbable. We have spent years reducing the staff and again increasing to this degree seems improbable. This is not a creditable figure for increased employment. I fear that in reality that if the land is given over to housing development the majority of the owners of the new properties will not be people employed in Calderdale but people working in particularly Leeds, Bradford or Manchester. The proximity of the M62 and the prospect of improved train services will be a great attraction for easy development opportunities, not only for those employed in Calderdale. Other considerations relate to the local environment; there is in addition no realistic possibility of improving the traffic flow or pollution on any of the immediate road networks. The roads are bounded on all sides by existing development and there is no point in spending millions on compulsory purchase to widen a road for a short distance merely to move the traffic jam a few hundred meters in either direction. I have chosen not to add to the comments about the green environmental damage or the flooding but fully support those who have. Development in this area would be a bad choice for reasons that hold no logic at all, other than meeting a numerical target, and I would request the proposal are rejected.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2099**

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

Person ID: **960330**

Name: **Christopher & Brenda
Smith**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

Please, please, please can we save 'Our Greenbelt'. At this moment in time 'Greetland's Greenbelt'. We have lived in Greetland for 38 years, in the same house. A neighbour 38 years ago told us there were a lot of underwater streams in Greetland. Autumn/Winter 2019 saw gardens in our avenue flooded for the first time! We have had visits from the sewerage people, Calderdale Council and Yorkshire Water. Consequently four weeks ago two of our neighbours had their gardens dug up. Hopefully Calderdale Council will reimburse our neighbours to restore their gardens to pre-flooding condition. As it is more than likely that this flooding is a result of five houses being allowed to be built on Moorbottom Road! We like walking around Greetland's countryside and have noticed in the last two or three years how two wells have dried up. There was a spring down it's namesake Spring Lane, sadly it is no longer there. The stone trough exists but no water runs into it. Also the spring down Scar Bottom Lane has also dried up. Where is the water going? It has to go somewhere!!! I hope the Council will be held accountable for their decisions if the loss of this greenbelt goes ahead. The consequences of the loss of this greenbelt are ; more flooding, more traffic congestion, air pollution will rise. There will be a rise in noise and light pollution all leading to a rise in mental health issues which in turn all contribute towards 'climate catastrophe'!!!! There will be an increase in the demand on our local GP Surgery, the Dentists and Greetland's Primary School. The present infrastructure cannot cope with another 600 houses. Possibly another 600 children wanting to attend Greetland Primary School. I accept there is a need for more housing but before we dig up our beautiful countryside, our green fields which lie in the greenbelt, let's build on our brownfield sites, convert empty buildings into apartments and houses. Let's ensure all empty houses are occupied. I know of one detached family house in the Elland area which has been empty for years. Bought presumably as an investment! The houses proposed will not be for low income families, first time buyers or older people who want to downsize and which will free up family homes already in the Greetland area. They will be four and five bedroomed detached houses to accommodate people working in Leeds, Manchester.....to maximise profits for the developers. Building on greenfield sites is easier for the developers and again maximises profits! But once these green field sites are bulldozed then there is no going back. The 600 houses will produce an extra 1,200 cars. There will be more air and noise pollution. There could potentially be 600 extra lawn mowers going in the summer months. The loss and damage to our wildlife, which is irreplaceable, their habitats gone forever. Light pollution. Dark skies are becoming fewer and further between. There is so much history connected to our skies. We need to conserve what we have. Building on our greenbelt will exacerbate 'mental health' issues. Open green spaces give people a sense of well being, happiness,

contentment. Space to be able to 'stand and stare' and breathe in the natural air free from too much pollution. I quote a passage from the National Trust Magazine: 'We all want quiet. We all want beauty.... We all need space. Unless we have it, we cannot teach that sense of quiet in which whispers of better things come to us gently.' Octavia Hill 1883 Co-founder of the National Trust. She had a desire to protect the everyday beauty of places for everyone to enjoy, forever. We have such a place down Saddleworth Road and Brian Royd Lane. Not everyone can join the National Trust nor wish to get in their car and drive miles to walk in the open countryside. We have such a place on our doorstep. Where people can take fresh air with family and friends. Encourage children to be out in the open, exercising instead of inside and contributing to the obesity problem. Calderdale Council have the same opportunity, to stop our greenbelt fields being bulldozed, concrete foundations laid and six hundred houses built! Surely keeping our greenbelt is in line with the council's 'Wellbeing Strategy'. If the council are concerned about people enjoying good mental health, as Mr Butcher Calderdale's Director of Public Health says, I quote: 'A healthy and happy workplace is more than just an ideal ; it brings with it economic gains for businesses large and small too.' That's the message from Calderdale's Director of Public Health, Paul Butcher in his department's latest annual report. At a special presentation in which the importance of good mental health is discussed..... Good mental health is not just for the workplace but it is also very important in our homes and gardens and the area in which we live. Another 600 houses down Saddleworth Road will not help the mental wellbeing of the present residents but will exacerbate the problem! Mr Butcher also says 'If the local economy is to grow and flourish improvements to health and wellbeing must be prioritised! How true! Will Calderdale Councillors please consider their 'Wellbeing Strategy' for the people of Greetland. Because the proposed development of 600 houses along Saddleworth Road is not going to help our wellbeing. If it gets approved the development could take four or five years. There will be noise from the diggers as they excavate the beautiful green fields. Noise from the bulldozers, the wagons as they come and go from the site. The workforce - usually have radio's blaring music out. The dust, mud on the roads, more temporary traffic lights. The upheaval to all the wildlife that exists in the area. The loss of the wildlife habitats. We have the usual birds plus herons, grouse, owls, foxes and bats.. How does this help our mental wellbeing? We will need to join a business that is 'celebrating mental wellbeing' and trying to encourage more of it'. I worked for Calderdale Council for thirty years as a teacher. I would now like to retain my mental health wellbeing, by enjoying our greenbelt in Greetland and all that it offers. To continue to enjoy walking in our green countryside without hearing diggers, wagons, drilling, banging sawing, radios, seeing house after house being constructed to the number of 600. I would like to continue to hear the bird song. We heard an owl again last week! If the Leader of Calderdale Council, Councillor Tim Swift is 'committed to protecting Calderdale's green belt and wider countryside' will he please demonstrate it by taking off the greenbelt areas from the Local Plan. Let's build on brown field sites. Actions speak louder than words! We are trying to reduce our local carbon emissions. Councillor Tim Swift says I quote 'The Local Plan gives us the opportunity to manage this development to reduce the environmental impact and to protect the green spaces which are so vital for our communities and for future generations'. How true these words are! The Climate Change Working Party would like to update the Climate Change chapter of the Local Plan to include a commitment within Calderdale to reduce greenhouse gasses by 60% to 2032. How can this happen when there is a proposed development of 600 houses on Saddleworth Road? Is Greetland School going to be surrounded by 600 houses, which could equate to 1,200 extra cars going onto Saddleworth Road to access West Vale. All the fumes that this will add to the area. How healthy will that be for those parents who have chosen to walk their children to school? Rather than take the car and add to the already congested road! How healthy will it be for the many dog walkers, all the existing residents who already know the health benefits of walking and exercise in the fresh air is paramount to a healthy mental wellbeing and how important it is for fitness. Greetland residents don't need to be encouraged to go out and 'move more'. 'Calderdale gets 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 **HRU21**

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

Person ID: **955025**

Name: **Mr David Fielden**

Organisation:

Agent ID:

Name:

Organisation:

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 land is a flood plain and floods regurly partickarly to the rear of Woodfield Drive. It will cause additional flooding further down Black Brook and the river Calder. The infrastructure is incapable of taking additional traffic. The are no places available at the local schools or GP' practices. It will destroy a wildlife sactury.

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

Duty to Co-operate Reason:

Suggested Modifications:

Significant parts of the land are subject to high flooding (3 to 4 times per year) particularly to the rear of Woodfield Drive and therefor should be removed.

Comments:

Additional Evidence Link:

Comment ID

HRU2110

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 **HRU2120**

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

infrastructure, impact on wellbeing and quality of life of children, safety of the road and air pollution I can't see how this plan is sound or legal and it does not conform to central government policy or current legislation with regards to building on flood risk areas. It also does not conform to any commitments the government has made on tackling air pollution and flooding in the area

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2122**

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

Person ID: **1129537**

Name: **Mr Michael Dobson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

THIS COMMENT WAS RECEIVED AFTER THE CLOSURE OF THE REPRESENTATION PERIOD. This element of the plan for the proposed development on greenbelt land in Greetland as listed under LP0177 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.

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

Sound Reason:

THIS COMMENT WAS RECEIVED AFTER THE CLOSURE OF THE REPRESENTATION PERIOD. I object to the plan and object to it and highlight the fact it is NOT sound for the following reasons. Loss of the Green Belt within Greetland Esther McVey's policy says that; "protecting the green belt goes beyond protection against development" and therefore, this proposal goes against this directly as other suitable brownfield sites that do exist in Greetland have not been explored sufficiently and proposed as alternative development considerations. Clearly all policies and findings suggest a common view that we must focus an importance of protecting our greenbelt spaces. Referring to National Planning Policy Framework (NPPF) chapter 13, paragraph 143 says that: "Inappropriate development is, by definition, harmful to the green belt and should not be approved except in very special circumstances". Given all other associated "issues" with this stretch of greenbelt land, such as infrastructure, flooding, and community impact, then I would objectively suggest that there are NO EXCEPTIONAL circumstances that could in any way justify this development on the greenbelt in Greetland and the massive negative impact it will cause. Further: referring to the NPPF chapter 13 paragraph 137: "...-" before concluding that exceptional circumstances exist to justify changes to greenbelt boundaries, the strategic policymaking authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy: a) makes as much use as possible of suitable

brownfield sites and underutilised land..."Suitable Brownfield sites are available in Greetland and have NOT been exhaustively considered as alternative land for development. The negative impact on wildlife and the health and well-being of the local community will be immeasurable if this development happens. Suffice to say that this Greetland greenbelt land is used by a large number of local residents on a daily basis. The need to preserve this - "highly sensitive greenbelt" (actual classification on the Local Plan) its local wildlife and being a place of healthy recreation, exercise, wellness and enjoyment further support the call for this proposal to be scrapped and alternative brownfield land in Greetland be approved for any development. Flooding Chapter 14, paragraph 163 of the NPPF says: - "when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere" Calderdale Council has failed to comply with policies on flood risk management. and environmental issues have been ignored by this Council. Under question is the Calderdale Council's Sustainability Appraisal process that supports the release of these Greetland Green Belt development sites with the 'Land adjacent Ellistones Place' (Ref: LP0177) being part of the wider Calderdale Local Plan 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". Military support has been called into Calderdale on Saturday 15th February 2020 whilst we brace ourselves for the onslaught of Storm Dennis and following the risk to life and devastation of the floods created by Storm Ciara last weekend. The impact on the Calder Valley and the actual effects onto Saddleworth Road, and down into the proposed development site LP0177 is clear. The local and national news is covering the huge flood impact on our local community in Calderdale. Huddersfield Examiner Website Headline Story February 15th 2020: - "Storm Denis Flood Fears In Calderdale, Prompts Army Response to Protect homes..." Yorkshire Post Website February 15th 2020 - "Armed Forces Arrive In Calderdale to SUPPORT flood response and Storm Dennis preparations" The Belfast Telegraph February 15th 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 of this green belt. 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. This proposed development is a RISK to life and the change in the landscape, due to the development, will further fuel the ongoing worsening of flooding in this area due to climate change and previous development of natural landscapes. Community The development will have a negative impact on the community. The entire Greetland 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 every day. I walk our two dogs along the entire Greetland greenbelt and it's a great example of, what should be, protected greenbelt land that offers massive health and well-being benefits to local residents and also a thriving environment to the abundant wildlife. From the NPPF, it clearly says ... "To protect and enhance biodiversity and geodiversity, plans should: a) identify, map and safeguard components of local wild-life rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity..." Clearly this development is at odds with this directive as it would damage local wildlife altering and negatively impacting biodiversity as well as habitats and the landscape. Alternative land in Stainland has been previously removed from the Calderdale Local Plan. This land in Stainland would have avoided all such negative impacts. Therefore, the Calderdale Local Plan and the local planning authority have failed to adhere to this legislative policy. Infrastructure The entire proposed development in Greetland under the Calderdale Local Plan of approximately 600 homes is simply

unsustainable from a physical infrastructure perspective. The local schools are full, the local GP surgery is under massive pressure and the road infrastructure cannot cope with current traffic levels. The pressure on the traffic light controlled junctions within West Vale, with traffic feeding from Saddleworth Road, Stainland Road and Rochdale Road, is unsustainable and the aforementioned road structure is almost not fit for purpose with current traffic levels. When there are any issues on the M62 between junction 22 and 24 (fairly frequently) then these routes become completely gridlocked. An extra estimated 1200 cars just feeding into this from the Greetland sites as proposed with the Calderdale Plan will not only add increased congestion issues but also have a bigger impact on the environment and also increase the risk to pedestrian safety and wellbeing.

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

Duty to Co-operate Reason:

THIS COMMENT WAS RECEIVED AFTER THE CLOSURE OF THE REPRESENTATION PERIOD. 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.

Suggested Modifications:

THIS COMMENT WAS RECEIVED AFTER THE CLOSURE OF THE REPRESENTATION PERIOD. All land within Greetland should be pulled from this plan and all brownfield land should be fully used as an alternative.

Comments:

Additional Evidence Link:

Comment ID **HRU2127**

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 become more frequent as a consequence of climate change. Therefore flood plains will become ever more important to -"slow the flow" and reduce the peak river levels further downstream. To build houses here is inappropriate both at a very local level and further afield. Development here on site LP 0177 will result in additional surface run off, which contributes to additional flooding. The fields currently act as a natural flood defense. If new development is related to causing flooding to existing properties, like the houses on Woodfield Drive, the development does not comply with NPPF policy. We need to question the Council's Sustainability Appraisal process to support the release of the new sites with the site at 'Land adjacent Ellistones Place' (Ref: LP0177). This appears to be a completely unjustified recommendation. The site report states that the assessment of SA7 is 'Negative' and marked 'RED' commenting that "Overall the impact is negative as the site is greenfield and lies within flood zones 2 and 3". Based on this information this site should be excluded, and Calderdale has declared a climate emergency. 3) Sustainable development & Infrastructure: The function of the planning system/process is to facilitate sustainable development that makes a positive contribution to the environment. It is not the role of the Council to release demonstrably unacceptable sites within the Green Belt to meet a housing target. The existing infrastructure is not adequate to support the development on this site or at others identified within the local plan. The road network is already operating at capacity and frequently backs up at Saddleworth Road and Stainland Road at peak times, additional traffic from the development will only exacerbate this problem further. The queuing traffic will lead to increased levels of pollution, which is of particular concern at the Greetland school site which is situated at a lower level than the road. There currently is no space at doctor and dental surgeries in the area. Similarly the additional housing proposed will be designed with families in mind, and there is insufficient capacity at local schools. There are extremely limited public transport services in the area. 4) Greenbelt land The greenbelt is highly sensitive, due to the wildlife corridor and the way in which it acts as a natural flood defense. The public right of way runs through this stretch of greenbelt and provides the local community free access for leisure and recreation. Why has this been left in the plan when Stainland, on high ground which does not have flooding issues has been saved from the local plan? The development here in Greetland will have much greater harm due to the flooding. A labyrinth of underground springs already cause small scale developments problems. The Greenbelt is protected land which is designed to prevent urban sprawl and towns merging into one entity. Greetland and Barkisland are villages if building on the Greenbelt takes place, then there will be no distinction between them. There is no valid reason to destroy this Greenbelt land when there are brownfield sites available in the area for development. There are many mature trees on the site that need to be protected, as well as the visual amenity, these trees reduce pollution, stabilise the land reducing erosion caused by surface water at times of heavy rain. This area of greenbelt is home to numerous species of wildlife - deer, dippers, bats and countless species of insects. The wildlife & Countryside Act (as amended) 1981, The Conservation (Natural Habitats &c) Regulations 1994 and the

Countryside & Rights of Way (CROW) Act 2000 are all being contravened by including this site back into the Local Plan for development. Although the Calderdale Council's Senior Planning Officer recently stated at a Local Plan Meeting that they had saved much Greenbelt, the fact is they have proposed to build on even more Green Belt in Greetland than on the previous agreed Local Plan. Indeed the inclusion of sites in Greetland including site LP0026 is the majority of Greetland's existing Green Belt. Esther McVey, the current Housing Minister's written policy on Green Belt land states -“protecting the Green Belt goes beyond protection against development” and -“Greenfield sites should not be what we turn to, not what we look at first. Every blade of grass must be looked at before it is changed.” In conclusion, all other issues which have been flagged and some highlighted by the council itself STILL remain.... Traffic impacts Air pollution Infrastructure Flooding They all just add to the fact that the proposed plan is not sustainable in NPPF terms. When the harm identified is taken into account then the proposed plans do not amount to sustainable terms.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID	HRU2131	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 **HRU2135**

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 **HRU2139**

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 **HRU2142**

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 **HRU2146**

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 **HRU2151**

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 **HRU2157**

Site ref (if applicable):

Person ID: **1243962**

Name: **Mrs Anne Crawford**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

Air Quality- This is of great concern as we live adjacent to Saddleworth Road. We already think that the air quality is poor you can smell the fumes when we sit in our garden from all the lorries and cars that use this road. When we walk to the park in West Vale with our young grandson the fumes can be terrible and this isn't at peak times. When the motorway is closed the traffic backs up as far as Ellistones Place , this will only get worse. Recent articles by experts at children's hospitals have concluded that infants exposed to traffic flow have less grey matter in their brains and are more likely to develop asthma. More houses, means more cars which means more pollution especially to vulnerable children at schools on roadside sites in Greetland and West Vale. Building the quantity of homes proposed for Greetland will massively increase traffic, this isn't just the homeowners cars but delivery vehicles. It is the local government's duty to protect young and old alike from anything that may deliberately damage their health. The government is committed to reducing road pollution so this massive development should not go ahead. Noise Pollution- We already experience levels of noise pollution from the many lorries that speed down Saddleworth Road. We have speeding cars and taxis during the early hours of the morning especially Friday and Saturday nights and we are usually woken at 6am in the morning by traffic. If all these houses are built the traffic noise will be unbearable. This does not help our well being but causes depression. Loss of Wildlife- We are really concerned about the huge impact of this mass housing will have on local wildlife. The plan to build on so many fields at once is irresponsible, wildlife doesn't stand a chance. The local plan will destroy so many habitats this also has an impact on human welfare and the benefits of nature. Behind our house there used to be a small wilderness (it was green belt), the area was full of wildlife - bats, squirrels, foxes, mice, moles and many species of birds. Their whole habitat was destroyed for the sake of two big houses now concreted over. The impact on wildlife coming to our garden has been huge we hardly see anything now. Flooding - It hasn't stopped raining since September (climate change). Greetland is situated on a hillside and is full of springs. When it rains water is coming out of the ground everywhere, down ginnels, pouring out of people's driveways, coming through walls etc. In December 2015 Greetland was awash with water in particular the fields in LP0177 and again a couple of weeks ago when the proposed building site was a lake. In both these incidences West Vale was flooded damaging property. If this building work is allowed to take place then instead of the fields soaking up the water, the water will rush down the hills into West Vale flooding West Vale but it won't stop there this will lead to increased flooding in Elland and Brighouse. In light of the desperate situation in Hebden Bridge and Mythomroyd and the plea by flooded households and businesses to try to prevent this from reoccurring it seems irresponsible to create that situation deliberately in this area. It was reported on the news this week that West Yorkshire has had the highest rainfall this winter than anywhere else in the U.K. Overdevelopment in one area - Greetland is being overdeveloped in comparison to other areas. We are expected to accept development on a life changing scale for people living in this area when other areas of Calderdale aren't seeing any development

at all. The sites should be spread across Calderdale. In the past Greetland has seen many developments especially on Saddleworth Road. We don't have enough school places now nether mind when all these family homes are built, doctors and dentists are full. West Vale is a nightmare now, we have lived here 19 years and I don't remember having 1 year when Stainland Road didn't have roadworks. Loss of Greenbelt- what's the point in having areas designated as Greenbelt when it seems so easy to take it out. The idea of Greenbelt is to protect the countryside not to remove it, it should remain Greenbelt forever. In January 2021 the government is introducing a points based system for immigration. The figures for the amount of houses required was based on the free movement of the European Union these figures now need to be revised so therefore there should be a reduction in the amount of houses built. Please listen to the real concerns of people who live in Greetland. At the moment it is a pleasure to see the green fields to the south of Saddleworth Road please keep it that way.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2174** Site ref (if applicable): **LP0177**

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 **HRU2175**

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

Person ID: **1246901**

Name: **Mr Stuart McLaren**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

Due to technical difficulties with your website we would like to register our objections to the proposed above development sites. Greetland is a beautiful semi rural village and the proposed extent of increasing the population density without any forward thinking regarding infrastructure would not be conducive to the 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 **HRU2200**

Site ref (if applicable):

Person ID: **1130552**

Name: **Mrs Nicola Beaumont**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Flooding You only need to look at the February 2020 floods to understand why building on this land is outrageous. Not for the first time, the river burst its banks along Saddleworth Road with flood water rising in the fields of the proposed development plots. Having previously lived on Saddleworth Road, I know for certain that this is not a one off. On many occasions, I would sit and watch as the river levels rose, and eventually fields (floodplains) becoming submerged in water. You can also look back at the floods of Boxing Day 2015. A memorable day when not only the river of Saddleworth Rd, but many parts of Calderdale (including Heath Rugby Club/Willow Valley Garden Centre), were unfortunate to be the victims of heavy rain and flooding. If these developments go ahead, where will the water go? The floodplains hold water in such a way that it creates a natural flood defence, storing water before it can take devastating effect elsewhere (people's homes and businesses). The Environmental Agency has as stated that this area of land is categorised as the most severe of all - Flood Zone 3 (land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%). Below are photos taken in the proposed Saddleworth Road sites following the February 2020 floods.

Green Belt This land is classified as highly sensitive green belt on the Local Plan. It is a designated wildlife corridor and is home to a number of protected species such as bats, hedgehogs, barn owls, wood peckers, herons and birds of prey. A large scale housing development would result in non-physical disturbances to the wildlife and protected species in our area. Such disturbances are noise, vibration, visual presence, human presence, light pollution and air pollution. Government policy states that all brownfield sites must be used first. Brown field sites have not been exhausted. Air Pollution Developing 600 new houses along Saddleworth Road, we can estimate that this will bring approximately 2 vehicles per household, which equates to 1200 extra vehicles on the road in the local area. West Vale cannot cope with the vast amount of traffic congestion as it currently stands; increasing this will only have significantly negative effects on traffic levels and the levels of air pollution. Air pollution consequently affecting the health and wellbeing of people especially those in close proximity of the area. For example, the children at The Greetland Academy and Greetland Pre-School. Being located at the side of Saddleworth Road will not only make this a physically unsafe place to be, but the health of these children will be impacted by the inhalation of added traffic fumes. The World Health Organisation stated that one reason why children are particularly vulnerable to the effects of air pollution is that they breathe more rapidly than adults and so absorb more pollutants. They also live closer to the ground, where some pollutants reach peak concentrations; at a time when their brains and bodies are still developing. The Clean Air Strategy 2018 stated that - "While we do need to ensure economic growth, we also need to realise the 'cost of air pollution on health.'" https://consult.defra.gov.uk/environmental-quality/clean-air-strategy-consultation/user_uploads/clean-air-strategy-2018-consultation.pdf

Community The proposed sites for development are used daily for walking and other forms of recreational activity such as biking and running. This green belt land is open space and a wildlife corridor, homing owls, bats, herons, hedgehogs but to name a few. The land is a quiet place, perfect for mental and physical health and wellbeing. Building on this land will be detrimental to the health and wellbeing of our people.

Infrastructure The Greetland Academy already consists of 2 classes per year group, with approximately 30 children in each class. This school is already split over 2 sites, both full to capacity, so how can it possibly cope with accommodating more children? Developing on this land will provide no option to extend the Key Stage 1 Site, and the location of Key Stage 2 makes it impossible to accommodate increased intake of children. The Doctors Surgery would struggle to manage waiting times and appointments with an increase in patients and the local Dentist already have a waiting list for new patients. Junctions at West Vale unable to accommodate additional volume of traffic, as it is already dysfunctional. West Vale is a thoroughfare for a number of locations including but not limited to: Halifax, Huddersfield and the M62. Commuters from various surrounding areas such as Ripponden, Barkisland, Elland and Stainland rely on the West Vale junctions to make journeys to these destinations. The increase in traffic congestion is too much for West Vale and surrounding roads to cope. Also, worth noting is, Rochdale Road which runs parallel to Saddleworth Road is

also impacted by traffic congestion from Saddleworth Road, and again is not capable of supporting the increased number of vehicles on the road as a result of the housing developments.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5634811> ; <http://calderdale-consult.objective.co.uk/file/5634810> ; <http://calderdale-consult.objective.co.uk/file/5634812>

Comment ID **HRU2210**

Site ref (if applicable):

Person ID: **1246925**

Name: **Mr George Hill**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

Green Belt Our Green Belt in Greetland is at the heart of the community and there is not much of it left. If these spaces are taken then they are gone forever. The government attaches great importance to Green Belts and stipulates the Green Belt should only be built on in exceptional circumstances. (Refer to Section 13 of the NPPF .) We have sufficient brownfield sites within Greetland providing they are used to accommodate the needs of our local community and to support our local economy and would ask that all 4 of the sites on the Green Belt be removed. How will the council replace our green spaces? I also object to the planning application 18/01189/FUL as this particular site would meet the needs of our local people subject to revised plans. Flooding Flooding is a major problem all along the Green Belt along side Black Brook. The fields were extensively flooded during the storms 8th/9th February 2020 yet again with flood water spilling over into the gardens and almost into the houses of Woodfield Drive. The water was too deep to even walk in and the river bank was totally cut off. The water was rushing into these fields at a terrible and frightening pace and you could not even see the boundary walls. To think that houses could be build on this land is completely outrageous (LP0177). Do we not have enough flooding, Calderdale have declared a climate emergency? Flooding is extreme and frequent. Wildlife Any development would decimate this Wildlife corridor. There is an abundance of wildlife, herons, owls, many different species of birds, pheasants, bats, frogs, ducks and many more. This is a very valuable part of our environment. There would be an increase in the air pollution, noise, vibration and of course human presence. This Green Belt with all the nature and wildlife should be protected. We need these green spaces for our health they are well used. The wildlife corridor could not survive a major development and is also a flood plain. Traffic and Air Pollution Should more houses be built there would be an increase of at least 1200 more cars as nearly every household has at least 2 cars if not 3 or 4. With the amount of traffic on this road I no longer feel

safe walking to West Vale. Traffic is regularly at a standstill on Saddleworth road as the road cannot cope with the amount of traffic that use it. West Vale is consistently congested. We need the air quality in our area testing. We cannot support a huge rise in concentrated air pollution. We have to think of the health of the children and the wider community. Infrastructure Without major adjustments these plans would result in urban sprawl and would have a drastic impact on traffic, schools, GP and Dental Practices. Is it not the governments priority to improve air quality and retain open green spaces. This being essential for our health and wellbeing? If the houses are built on the brownfield sites then I do not object and accept that there may be a need for more housing. It has to be the right housing in the right places.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2246**

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 **HRU2257**

Site ref (if applicable):

Person ID: **1246937**

Name: **Emma Sharpe**

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

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

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

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

Duty to Co-operate Reason:

Suggested Modifications:

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

Comments:

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

Comment ID **HRU2270**

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

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 **HRU2277**

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

Person ID: **1246958**

Name: **Mr Ian Barker**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

THIS COMMENT WAS RECEIVED AFTER THE CLOSURE OF THE REPRESENTATION PERIOD. I would hereby like to register my formal OBJECTION to the planned building on the land adjacent to Saddleworth road Greetland, Application numbers: LP0177 ; LP0026 ; LP0952 ; LP1625 Reasons According to legislation when planning and developing an area, buildings should first and foremost be built on 'Brown Field' sites, and not Green Belt land. I am aware that there are still a number of Brown Field sites that have not been developed in the area. All four sites listed above are currently Green Belt Land. Three of the sites listed currently also form part of the flood plane around the Black Brook river which does actually flood every year now. This Green Belt area forms part of a Wild life corridor where the following can be seen: Herons, King Fishers, Owls and most importantly Bats as well as squirrels and lots of other bird life. Also I have seen first hand what can happen when a building development takes place along side what is a clean river. Building waste pollutants and other rubbish ended up in the river, and actually killed a lot of the fish. This area is also used on a daily basis by people who like to take in nature and enjoy the sound of the river and the bird song etc. One other area of concern is the fact that if planning permission goes ahead for up to 600 houses then on average most households now own 2 cars. This would mean up to 1200 more vehicles could be using Saddleworth road on a daily basis. With most of them having to pass the Junior and infant school which is situated to the south side of the road and has actually been built below the level of the road. This means that when the extra vehicles are queuing for the traffic lights as they pass the school the Children are going to be more vulnerable to the dangerous pollution from vehicle exhausts which does actually stay down closer to the ground at low level. The traffic flow through both sets of traffic lights in west vale is already running at around 100% capacity during the morning and evening commute. With an estimated 1200 more vehicles using this route there is no way that these traffic lights will be able to manage without there being huge tailbacks and grid lock. Finally: I would once again like register my 'Objection' to the above mentioned planning permission being granted.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU23**

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

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 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 fields LP0177 Ellistones Place Saddleworth Road, Greetland suffered severe flooding (pictures attached). The flooding was so severe by Woodfield Drive that one resident was able to paddle his canoe on it. Any building on this

land would cause flooding of the houses at Woodfield Drive and in West Vale and therefore does not comply with current flooding policy and legislation as outlined above. Calderdale Council Planning Department has a duty of care to comply with current policy and legislation on flooding. Furthermore several months ago Saddleworth Road adjacent to these fields burst as it was unable to absorb the water flow and the road had to be closed off for several days contributing to a car accident on this busy road (this is not the first time water has forced its way through the road causing disruption). 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, current Housing Minister's written policy on Green Belt land and quote: -"My department is working with DEFRA (Department of Environment, Food & Rural Affairs) and Natural England on the once-in-a-generation Environment Bill which will establish a comprehensive legal framework for environmental improvement and make net gains for biodiversity mandatory for new development. Of course one of the most important environmental safeguards we have is the Green Belt. And I want to be clear that our commitment to this is as strong as ever, with any changes only happening in exceptional circumstances ; protecting the Green Belt goes beyond protection against development" - Exceptional circumstances in The Government White Paper- "Fixing our Broken Housing Market" - Paragraph 1.39 states that: The Government wants to retain the high bar to ensure the Green Belt remains protected, but we also wish to be transparent about what this means in practice so that local communities can hold their councils to account therefore we propose to amend and add to the National Policy to make it clear that: authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including :- making effective use of suitable brownfield sites and the opportunities offered by state regeneration :- - There has been no evidence of this and planners in Calderdale's Planning Department have stated several times -"Developers do not want to build on brownfield sites" - this is against government policy and does not constitute exceptional circumstances. I refer to the judicial review - Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council (2015) EWHC 1078 (Admin), Jay J - where Richard Turney appeared for the claimant "Mr Turney ... submitted that the fact that a particular site happens to be suitable for housing development cannot, without more, constitute an exceptional circumstance justifying an alteration of the Green Belt. I agree with Mr Turney insofar as this goes .. Suitability simpliciter cannot logically be envisaged as an exceptional circumstances". - This land is classified as "highly sensitive green belt" on the Local Plan. In 2016 regarding the first Local Plan a petition with 161 signatures objecting to building on our beautiful Green Belt was presented to Calderdale Council Planning Department and 30% of the total objections submitted from the whole of Calderdale residents were from the Greetland area alone. - This appears to have been ignored. 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 aid the Clean Air Policy. Current legislation re building on high risk flood area: <http://www.environmentlaw.org.uk/rte.asp?id=105>

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. The NPPF sets out the aim of Green Belt policy which is -"to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence." (NPPF 79). Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: (i) to check the unrestricted sprawl of large built-up areas (ii) to prevent neighbouring towns merging into one another (iii) to assist in safeguarding the countryside from encroachment (iv) to preserve the setting and special character of historic towns (v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The Council, in its own evidence, concludes that the overall parcel within

which the site is located performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt but, most decisively, would see the coalescence of Greetland and West Vale and the deterioration of the identity of both places undermining the Council's Settlement Hierarchy. Notwithstanding this, the quantum of housing proposed in and around the site is undeliverable during a single plan period in plan-making terms and unsustainable in infrastructure terms in relation to the capacity of existing highways, schools and local services. Accordingly, this site in the existing Green Belt should be removed from the Plan as the exceptional circumstances for its release do not exist. 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:

1) Does not comply with current policy and legislation on flooding. 2) There are no justifiable exceptional circumstances for change of use of this Green Belt land.

Suggested Modifications:

Current policy and legislation on flooding states "due to every increasing wide-scale flooding incidents in the country and the ever increasing threat of climate change new development in a flood area that increases the risk of flooding in the development's community or elsewhere is not permitted". - Therefore I respectfully request this site is removed from the Local Plan.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5582307> ; <http://calderdale-consult.objective.co.uk/file/5588463> ; <http://calderdale-consult.objective.co.uk/file/5588464> ; <http://calderdale-consult.objective.co.uk/file/5588465>

Comment ID **HRU2311**

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/5635672>

Comment ID **HRU2333**

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 **HRU2339**

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 **HRU288**

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

Person ID: **1242021**

Name: **Mr Damien Margetson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I am not qualified to answer this question

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

Sound Reason:

I have set out my comments on the following plans LP0026 (The Gate Farm), LP0177 (Land adjacent Ellistones Place), LP0952 (Land at New Gate Farm) and LP1625 (Land to the west of Silverdale Terrace). These observations are based on my personal reflections, having lived in the community for the past 4 years, against the objectives which are set out in National Planning Policy Framework dated February 2019 (-"the Framework")¹. 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"² I can't see how this objective is achieved with the current plans. 600 new homes requires the development and provision of significant changes to the infrastructure in the surrounding area BEFORE the homes are built. There is none in the current plans

for this as far as I can determine. Local schools, doctors and dentists are currently oversubscribed and have no capacity to accommodate any more residents. Where will they go? The local bus service already does not meet the demands of the area, with the 503 services to Halifax and Huddersfield often being oversubscribed and delayed due to the existing traffic hold ups. Additionally this service running through West Vale is between 1-2 kilometres away from the majority of the proposed houses on these sites. The 343 service passing along Saddleworth Road is infrequent (only one bus per hour) with bus stops only on one side of the road - a safety risk for not only children and the elderly, but indeed for everybody, especially given the speed at which traffic enters the area and the heavy wagons using the road. The local traffic in West Vale and Greetland is already at a standstill in peak times and this is slowly getting worse at off peak times. There are currently proposed developments for improving the road network on A629 Huddersfield to Halifax corridor and on the A58 / A624 Halifax to Rochdale / M62 routes. This is great news for improving commuting along these routes, but it misses the point that Saddleworth Road is a direct connection between these schemes. Any improvement at the entry and exit to Saddleworth Road is pointless if the access between is congested and doesn't flow, as is the situation now in the bottleneck that is West Vale. The introduction of 600 houses along this route will only further add to this congestion and seriously undermine the economic benefit which is supposed to be generated from these Road Schemes and housing developments. Saddleworth Road itself is already an infrastructure disaster, especially in and around the areas of the proposed new developments. Throughout the whole 2019 there have been roadworks somewhere along this stretch of road. Invariably it is as a result of water rising to the surface, which I am told by the Individuals doing the repairs is due either to one of the numerous fresh water springs bursting through the surface material or the decay of the old pipework, which is being patched. It is not surprising the local road conditions are so poor (some of the worst I have seen in my travels across the country) given the volume of traffic which currently uses this road, especially from the HGVs which have to use the road to access the Sonoco recycling plant and the Bosch industrial units. Every journey requires me to wait for one of these HGVs to manoeuvre around the parked cars before any progress can be made. God knows what damage construction vehicles and a further 600+ cars will do to the road. The Council seemingly already doesn't have enough budget to repair the existing roads properly and sustainably - the situation is only going to get worse. I have noted that as part of this process Greetland has been classed as part of the Elland Township to justify the proportion of allocated land. I do not see how this can be so. Greetland is a separate village with its own characteristics, community, infrastructure and councillors. I have never considered myself to be living in Elland. We are clearly separated by Long Wall. If Greetland is looked at as a separate locality, which I strongly believe it should, then the local plan allocates a disproportionately high number of new homes in this area as well as creating large scale urban sprawl which is contrary to para 80 of the Framework. Social ; health and fumes / pollution At para 170 the framework states ' Planning policies and decisions should contribute to and enhance the natural and local environment by: " | a) protecting and enhancing valued landscapes, sites of biodiversity or geological value' The Greenbelt areas under discussion sit within the heart of the Greetland community. Taken together, they form a large open space creating a wildlife corridor full of biodeiversity. If this proposed development were allowed to go ahead the landscape and natural habitats for these animals would be lost, causing distress and irreparable destruction. I regularly witness deer bounding through the fields under consideration. Where would these creatures go? It is not a sound argument to suggest that the wildlife corridor could be protected. Once their natural home is taken away, it is gone for good. The framework also states at para 170 e) that policies and decisions should contribute to and enhance the natural and local environment by ' preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution ' and ' Development should" | help to to improve local environmental conditions such as air and water quality' . I do not see how the building of 600 new homes, with the associated emissions from both heating and cars can possibly do anything but have a detrimental affect on the local air pollution. Saddleworth Road, the main road through these developments, is already a primary route for a large number of lorries a day from the Bosch factory, the Sonoco recycling plant. Add to that an additional 600

homes within a small area and the community is exposed to unacceptable levels of traffic and air pollution. Environmental: The framework documents states -“ The Government attaches great importance to Green Belts "it goes on to state -“Green Belt boundaries should only be altered where exceptional circumstances are fully evidence and justified" At para 144 it further states -“ local planning authorities should ensure that substantial weight is given to any harm to the green belt"and at para 145 -“ a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt "I can't see how any of these statements can be met with the building of 600 new homes on an area of sensitive Green Belt. At para 155 the framework states: -“ Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere "The areas proposed for the new 600 homes is on Green Belt that naturally floods. In the 4 years I have been a resident of this community the area has been completed flooded twice. With the local area full of fresh water springs it is not uncommon to find the local drains and sewers unable to cope even after shortest of prolonged heavy bursts of rain, and it is only the presence of the Green Belt area which prevents homes flooding on a regular basis. The frequency of these heavy and prolonged rains is only set to increase with the global warming challenges we currently face. It therefore seems incongruous to add to this problem by building on the only area which nature has provided to counter the irreparable climate changes we are facing. In September 2019, The Housing Minister, Rt Hon Esther McVey announced that local authorities would be receiving money to crack down on illegal developments in Green Belt areas, stating that ' Once the Green Belt is built on its often gone for good, thats why we are determined to protect it. The public have told us loud and clear they want it kept for future generations to enjoy. ' I understand that Calderdale Council is set to receive Â£50,000 of this Planning Delivery Fund. How can it justifiably take this money in one hand to prevent inappropriate building on Green Belt Land, and in the other hand allow the large scale destruction of Green Belt Land in the Greetland area? This is the first time I have ever objected to a proposed development - I am doing so because I feel so strongly that we need to protect this area of natural Greenbelt. 20 years ago we were told that if we didn't make changes then climate change would ruin our planet - as human beings we largely chose to ignore those warnings. We are now starting to reap the consequences with increased temperature extremes, earthquakes, storms and flooding. My children continually tell me that our generation are ruining their future. They have a valid point. We need to stop the continual disregard for our environment, natural habitat and wildlife and instead seek alternatives. There are numerous brownfield sites (as well as lower flood risk areas) that could be considered as development options to create new housing - some of these may be more expensive to develop, but developers profits should not be the overriding consideration in deciding where to build. Neither should political motive. On this basis, all 4 of the sites, LP0026 (The Gate Farm), LP0177 (Land adjacent Ellistones Place), LP0952 (Land at New Gate Farm) and LP1625 should be removed from the Local Plan

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

Duty to Co-operate Reason:

I dont believe qualified to answer this question

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU309**

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

Person ID: **1238776** Name: **Mr. paul holmes** 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 significant issues to this planned development including loss of large areas of green belt (where brown belt elsewhere would provide the housing), the congestion in West Vale is already horrendous, you literally wouldn't be able to get in and out of the village with this amount of extra traffic, there is a lack of infrastructure for the additional building that has already happened in the village, never mind this, it would have a severe impact on air quality, and the flooding risk would be increased and the effects would be devastating as in 2016.

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

Duty to Co-operate Reason:

Suggested Modifications:

The suggested amount of housing needs to be drastically reduced, or stopped altogether. The only other option would be a bypass, but that would obviously be an incredible expense, but totally necessary if this went ahead.

Comments:

Additional Evidence Link:

Comment ID **HRU311**

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

Person ID: **1242293** Name: **Mr Andrew Beaumont** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

Please refer to comments below

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

Sound Reason:

For the attention of those responsible for Approving or Rejecting Local Development Proposals (Local Plan Team, Councillors, Local and National Planning Inspectors, Katie Child, Miny Schofield) Dear Sir, Letter of Objection to Proposed Housing Developments in Greetland - Site Ref LP0952. LP0177, LP1625 and LP0026 I have been a resident of Greetland all my life, some 63 years. Over that period I have witnessed the

relentless creeping expansion, development and transformation of our once small desirable residential rural village into a fairly large residential conurbation of urban sprawl serving the commuter belts for the cities of Leeds and Manchester. Already gone, over my lifetime, are many of the green fields and areas where we played as children, in favour of large housing developments. However, these developments are modest in comparison with the proposed Housing Development Plan which some local and national politicians seem determined to drive through, no matter what the cost to our community, environment, air quality and wildlife. If this development comes to pass, the village of Greetland will balloon, in a very short space of time, by 30 - 40%. And, apparently, with no forward thinking about how this expansion can be serviced. The community already seems to be serviced to full capacity by roads, public transport, doctors, dentists and schools. Any future demands on these services would be unsustainable. Anybody living in the area, including the surrounding areas of Elland, Stainland, Norland, Barkisland and Ripponden, understands the nightmare of rush-hours in West Vale. For years, it has been a bottleneck for residents, using both public transport and private cars, as all routes lead to the traffic-light controlled junction of Saddleworth Road and Stainland Road, followed within 200 yards by the next traffic-light controlled junction of Rochdale Road and Stainland Road. At each of these locations there is the added complication of two very busy, relatively new businesses (the Co-op and Springhead Funeral Services) - how, in heavens name, was permission ever granted for their main vehicle access points to be located immediately next to the traffic lights, creating a near certain recipe for both road traffic accidents and/or holding up the traffic? And obviously, as a result of the traffic congestion on Saddleworth Road, some residents of the Sunnybank, Daleside and Trenance Gardens areas, as well as some residents of the new homes, will divert their routes to use Rochdale Road which will simply distribute the congestion to the whole of Greetland. There is currently no way of avoiding West Vale and there is no way of expanding the road network to by-pass West Vale in the future. And then there is the very serious consequence of this massive increase in traffic - air pollution. The development is within a valley which will trap traffic exhaust fumes. Within this valley are two schools, Greetland School Sunnybank Annex and West Vale, where some of the most vulnerable people in our society, young children, will be subjected to high levels of toxic air pollution every day of the week. And what will be the impact of all this air pollution on the Council's health and anti-obesity campaign? The loss of this Green Belt will remove an extremely popular route for many people taking social exercise, not only to improve their physical health but also their mental health well-being. The alternative would be to walk along Saddleworth Road, breathing in the pollution, or driving further away to rural areas for cleaner fresh air. The area along the Black Brook is also a recognised Wildlife Corridor - sightings of bats, owls, herons, kingfishers, badgers and deer are commonplace. If this development gets the green light, the destruction and eradication of the existing flourishing ecosystem is guaranteed. In this age of Climate Change and Global Warming, we are constantly being reminded of the adverse effects on our environment. And the proposed development area is no stranger to regular and serious flooding (in 2015 we experienced some of the worst flooding in living memory). The fields around the Black Brook act as a natural flood plain, without which, more serious flooding of developed areas further downstream would be a certainty. Existing drains and sewers already appear to be working to full capacity so any significant increase in foul and surface water volumes would spell certain disaster at the point of discharge. Surface water attenuation systems can be designed and included within the engineered drainage proposals, but the very old existing infrastructure at the end of the line was not future-proof designed for the volume of water that would be generated by developments of this size. And would a development of this size, combined with all the other concurrent developments throughout Calderdale, necessitate the construction of additional sewage treatment works? We already have "the Smelly Mile" in our locality, Stainland Road from West Vale to the Calder and Hebble; additional sewage treatment will not do anything to improve the air quality here. I have recently read a document taken from the Council's Planning website, entitled "Local Plan Initial Draft 2017" in respect of Site LP0177. Never have I seen a report so heavily slanted in favour of its paymaster, David Wilson Homes, and so obviously commissioned and prepared by a well practiced Specialist Planning Consultant, who probably lives many miles away and will, therefore, be unaffected by the consequences of this development, and who has spent only a couple of

days surveying the area and really knows nothing about our community and it's way of life, and in order to satisfy the ulterior motives of some members of Calderdale Council to drive this development through whatever the cost. Some of the statements, comments and responses in each of the Site Assessment Categories are so theoretical and standard that they could have been taken from the manual "How to Get Your Development Through the Planning Hoops" and could have been prepared at a Consultants desk in the Outer Hebrides with the aid of Google Maps and aerial photographs. To prepare a report that truly reflects the conditions and consequences of such a major development, you need to live in the village, you need to use the services and facilities, and you need to know and understand the community, the habitat and the behaviour of the people and the wildlife that is home to all of us. So do I agree with the site assessment? ABSOLUTELY NOT! I have not used the on-line Planning Portal because it isn't easy to navigate and I felt it was easier for me to speak from the heart in a letter. But please ensure my letter of objection is added to the many other similar letters you may receive.

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

Duty to Co-operate Reason:

See previous comments

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU316**

Site ref (if applicable): **LP177**

Person ID: **1128222**

Name: **Mrs Bennett**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

With specific regard to Community Involvement I do not believe that community involvement is in general accordance with the Calderdale Statement of Community Involvement 2015. Section 1.2 of the Calderdale SCI 2015 calls for Clarity. - "We need to be very clear about what we are asking people and we must be sure that people understand what will happen as a result of this engagement. This includes being clear about what decisions have been made, what have not, and who will make the final decision." Until a recent local meeting on January 27th, and a local action Facebook group was set up, very few people in the Greetland Ward were aware of the Local Plan and proposed new allocations within the area. - It is unclear that site allocations submitted in the 2018 draft plan are still in the Local Plan and hence people do not have a clear picture of all the site allocations included. This makes a significant difference when looking at percentage growth of a community. - many people including myself are not clear on what we are being asked with questions such as 'is the plan legal?' 'Do you consider the plan complies with Duty to Co-operate?'. - With regards to LP26, LP177, LP952 and LP1625: Greetland, Sunnybank and West Vale Wards still remain part of Elland. This is misleading and means some residents would take a look at the initial directory of new site allocations, and failing to see Greetland on there, think that there is no inclusion in their area. I made this error in the 2017 submission process until corrected by a neighbour. - The SCI under section 1.3 states - "to keep the process simple" and - "to make it easy to get involved" Asking questions

such as -“is the plan legal” is not simplistic as most people outside of a planning department would not know the answer to this question and would potentially be put off contributing. - I do not think it has been easy to get involved. Most people, in a room full of over 200 people at a recent local meeting, did not know where to find the local plan or how to go about commenting. This is also evident by the fact that Councillor Paul Bellenger has pushed the Head of Calderdale Planning for an email address, external to the online portal, to try and make it easier for people to comment. The council has provided a Sustainability Appraisal Report. However, under the chosen Option 4, of the 17 objectives analysed, 9 of them have been marked as -“uncertain” impact. I question how fully this report has been used as a 'tool for appraising policies to ensure they reflect social, environmental and economic factors' when the impact to the Greetland community at local site level of so many key outcomes are also uncertain including: accessibility to essential services, facilities and employment; to reduce the risk of flooding; to reduce the effect of traffic on the environment etc.

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

Sound Reason:

Justified - in choosing the sustainable option has the council considered the impact of Brexit on economic growth and resulting housing requirements? has the council ruled out all other sites such as Brownfield and less site sensitive sites? Positively prepared - has the council consulted other neighbouring authorities to see if they can accommodate potential sites as opposed to destroying greenbelt in an area like Greetland that already requires most people to travel to work by car? Effective - placing such a significant number of houses in such a small community is not deliverable and there are no significant infrastructure plans in place to evidence that it is sustainable. Is the plan consistent with national policy? No, my summarised objections to this site allocation are: - disproportionate growth of 33.8% to the Greetland Community which contradicts Greenbelt policy to restrict urban sprawl - No exceptional reasons to remove Greenbelt status - Strains on existing road and junction infrastructure with little planned mitigation for these new proposals - Loss of habitat and wildlife - Unmeasured impact on air pollution for both the area as a whole and the local primary and preschool sites on Saddleworth Road. These objections are substantiated below to relevant policy. Disproportionate increase to the Greetland Community. - LP26, LP177, LP953 and LP1625 are so close in proximity that they should be viewed jointly as well as individually. Calderdale Infrastructure Delivery Plan 2019, Table 3 shows the Distribution of household growth for 2018-33. It incorporates Elland, Greetland, Stainland and Holywell Green into one group. As such, expected percentage change in household growth is 8.21%. - This fails to give the Inspector a clear image of the distinct communities within our wider area. This is an oversight as the NPPF under Achieving Sustainable Development Section 2, point 8 states a -“social objective” to support vibrant and healthy communities. The Cambridge Dictionary defines community as -“the people living in one particular area” Elland is 2.4 miles from Greetland postcode HX4 8PG and as such should be considered as a separate area. (Apple maps). Looking at the ward map for Calderdale, the community of Greetland should be defined by the interlinking of the Greetland and Sunnybank wards, with the possible inclusion of West Vale. This is due the proximity of the housing in these wards and the significant infrastructure and environmental effect that would be concentrated in this space. See link for ward map: www.calderdale.gov.uk/v2/maps/offices-political Under the Calderdale Review of Polling Districts 2019, the number of properties per polling district is as follows: - Greetland 1221, Sunnybank 505, West Vale 1119. This totals 2,845 properties. - Under additional local site assessment reports LP26, LP177, LP952 and LP1625 are all in immediate vicinity of Greetland and Sunnybank wards. Combined we would see 543 additional new houses built in this distinct community on top of capacity allocated in the 2018 plan. As a percentage of the 3 wards this would see a disproportionate growth of 19% or 22.4% when adding in the 2018 site allocations. - Many locals have further purported that the West Vale Ward is a community in itself (having its own primary school) which would take growth of Greetland and Sunnybank to 31.4% or 33.8% when including 2018 allocations. (<https://www.calderdale.gov.uk/v2/sites/default/files/Returning-Officers-Recommendations.pdf>) Within

the Potential Sites considered and rejected report CC37, LP1028, which is also in Greenbelt, had a planned site of 122 dwellings removed. One of the reasons stated is that it would give a "disproportionate increase to Barkisland village". The increase based on the same dataset above would have been 16.6%. If Barkisland can be pulled out of its grouping with Ripponden and Rishworth then we suggest that Greetland can be distinguished from Elland. If 16.6% is disproportionate to one village why is 22.4% or even 33.8% not disproportionate to another? Perhaps the answer to this is sadly in the other reason why LP1028 has been withdrawn lack of interested developer! This shows lack of consistency in application of NPPF policies. Furthermore, The Sustainability Assessment Report for LP26, OBJECTIVE TO CREATE AND RETAIN HEALTHY VIBRANT AND INCLUSIVE COMMUNITIES has been given as 'overall impact is positive as the site is within a 0-15 minute journey of a town centre; is within 600m of Public Open Space; and within a 15 minute journey to a GP surgery'. This fails to take into account that the massive increase in traffic from the combined sites will increase travel time substantially, is reducing open space by building right next to a public footpath where people enjoy the view of open space and the local GP surgery is full and may no longer be within 15 minutes due to the increase in resulting traffic . The Cabinet report on Potential Modifications to the draft Local Plan paragraph 1.4 states that ' a sound Local Plan delivers a sustainable scale and distribution of new homes....whilst protecting and nurturing our environment'. - This scale of distribution (22.4-33.8%), within one village community, is not sustainable given the infrastructure shortfalls of traffic, schooling and other services. - The Sustainability Assessment reports for all 4 LPS for OBJECTIVE 5 TO IMPROVE ACCESSIBILITY TO ESSENTIAL SERVICES, FACILITIES AND EMPLOYMENT have been marked as positive yet they all note the risk of demand on existing services whilst not making plans for mitigation. - This also contradicts the purpose of Greenbelt to restrict urban sprawl (paragraph 134 NPPF) and would also decimate 23.74 hectares of Greenbelt with no exceptional circumstances given (measurements taken from Local Plan Assessment Reports). - This also contradicts the purpose of Greenbelt to -“ assist in safeguarding the countryside from encroachment” All 4 LPs against The Sustainability Assessment of OBJECTIVE 13 TO ENSURE EFFICIENT USE OF LAND have been marked negative as it is all greenbelt. - Whilst we may be 'close' to transport investments (paragraph 1.5 Potential Modifications report) such as the A629 and potential Elland station etc the fact remains that most people will get in a car to get to these links. The only way to do this is via the 2 bottleneck crossroads in West Vale. - Graphs found on city ward explorer shows Greetland and Stainland as already having the highest percentage of cars per household in Calderdale at 84%. Equally it also shows that the average distance travelled to work is 13.2km. - By creating more houses in this area it will only add to congestion and air pollution which will not assist the council in reducing the Green House Emissions noted in paragraph 4.15. Nor does it support the councils wish in paragraph 4.2.1 to reduce car use. Additionally. Paragraph 103 of the NPPF states -“ Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health” There are no immediate plans for economic employment growth in Greetland hence no limiting of travel to the additional proposed 543 dwellings. In all likelihood we will see a significant increase in car usage as existing buses that service west Greetland are small and infrequent. The LP is also over 2km from a railway station. NPPF Paragraph 108 states that -“in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: a) appropriate opportunities to promote sustainable transport modes can be ; or have been ; taken up, given the type of development and its location; - The location of the site in an out of town Greenbelt area lends itself to car use - 84% of this population own a car. b) "safe and suitable access to the site can be achieved for all users;" - The Sustainability Report for LP26, Objective 2 to improve safety and security, shows an uncertain outcome hence this has not been ensured. The junction of Scar Bottom Lane and Gate Head Lane which are most directly effected by LP26 and LP952 is not adequately mitigated. In order to accommodate the resulting traffic and proposed roundabout the road would need to be widened, thus removing trees under Tree Preservation Orders. There would also be a knock-on effect of danger to the top entrance of Brian Royd Lane. This lane (as an extension to the lower part of Scar Bottom Lane) has restricted visibility and is

already used a a cut-through. This will only get worse. - Equally, no mitigation had been put in place to improve road safety outside Sunnybank Preschool and Greetland Academy which is already frightening at peak times of day with school traffic, tractors and Sonoco HGVs. - Calderdale are also planning the creation of an A58 Ripponden HGV Turning Circle. This has a significant impact on the Greetland area as it will encourage HGVs onto Saddleworth Road. I picture a mini roundabout at the bottom of LP26 with HGVs coming from the west, SONOCO trucks from the east, the local bus from the north oh and hundreds of new residents and the usual tractors! This is not safe or suitable access! - NPPF Paragraph 111 states - "All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed" - I ask the council to define 'significant amounts of movement' and ask do the sites combined represent significant amounts of movement and has a travel plan for these combined developments been or needs to be generated? Major development is defined as: - "For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more" - I suggest that the combined LPs area of 23.7 hectares will lead to significant movement. In order to be 'sound' and in accordance with the NPPF the plan should be positively prepared 'on a strategy which seeks to meet objectively assessed development and infrastructure requirements'. - With reference to the Calderdale Infrastructure Delivery Plan, Table 5: Congested Locations and Associated Funding Opportunities, the location of Stainland Road/Saddleworth road is considered and notes "upgraded signal improvement and localised traffic management needed". - This will be woefully inadequate for potentially 1000 extra cars as evidenced by the outburst of laughter at a community meeting when suggested that signalling upgrades enough would be sufficient. In fact WSP Parsons Brinckerhoff Report on Transport Network states traffic congestion at the juncture of Stainland Road-Saddleworth Road would increase by approximately 105%. The junction is already maxed out. - The infrastructure plan also highlights investment needed in West Vale and buses given priority. However, many of the bus stops in Greetland are unsafe, based on opposite sides of the road and are on routes which are too narrow so a complete overhaul of the bus infrastructure would be needed to accommodate this many people. - I do not feel that an adequate infrastructure plan is in place for this level of growth in one village community. The lack of infrastructure also contradicts paragraph 72 of the NPPF: NPPF 72. "The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:" - Calderdale does not have the support of the Greetland Community, only that of a couple of individual landowners and private developers. 33.8% is a 'significant extension' and we have not seen a thorough investigation of infrastructure requirements at a level local to Greetland. "a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains; " - With the destruction of 23.74 hectares of Greenbelt there will be no environmental gains, only significant losses to wildlife. The areas covered by LP26, LP177, LP952 and LP1625 represent a wildlife corridor home to deer, badgers, bats, owls, herons and many more species. "b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations)" - As a community we have seen no plans for sufficient access to services. The local school, doctors, dentists etc are full! A community should not be grown to the extent stated above without mitigation certain and planned. - The Calderdale Sustainability Report for Option 4 shows uncertain impact for accessibility to essential services. Also, the sites are more than 2km from a railway station and have limited bus services and thus access to sustainable forms of transport. This also goes against policy guidelines. Flooding - I also

question the ability to build quickly on LP26, LP177, LP952 and LP1625 due to local flooding issues. Many of these issues occur further up the hill in Upper Greetland with natural spring water that flows from Norland. There are ample cases where spring water has been diverted either naturally or due to building works and this then has a knock on effect on to the LPs states. This is often due to water that has been diverted due to building higher up and insufficient up-keep of pipes on private land. - In addition to surveyance of LP26, LP177, LP952 and LP1625 a full investigation of the water flows throughout Greetland needs to be conducted. LP26, LP177, LP952 and LP1625 act as a flood plain for the whole hillside. Building on these run-off areas should not start until the knock-on effect has been calculated for the whole village. - Indeed, this links to information on the Planning Portal PPS15: Planning and Flood Risk which states "B10 New development, whether building works, engineering operations or changes in land use, can increase flood risk. Most simply, siting a building within an area likely to flood will increase the direct risks to that building. The greater the quantum of construction, the greater the consequences of a flood event are likely to be. While the direct consequences of flooding for a building are generally readily identifiable, less obvious but equally significant indirect impacts can be caused elsewhere. <https://tinyurl.com/vyeaxrr> Is the council satisfied that indirect impact of flooding elsewhere in the area has been adequately assessed and risks mitigated? - The Sustainability Assessment report for LP26, OBJECTIVE 7 TO REDUCE THE RISK OF FLOODING AND RESULTING DETRIMENTAL EFFECTS ON PEOPLE AND PROPERTY is reported as Uncertain. 'Overall the impact on this SA Objective is uncertain, and any impact will be dependent on the design of any future development and any mitigation measures.' How can land be released when a full risk assessment has not been carried out? - LP177 has a negative outcome for this objective. NPPF paragraph 91 states "enable and support healthy lifestyles, especially where this would address identified local health and well-being needs ; for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling." - Building on LP26, LP177, LP952 and LP1625 would have a detrimental effect on healthy lifestyles of the Greetland Community. These open spaces are often used for walking. The effect of existing open space on the community's mental wellbeing is also important. The World Health Organisation on its own website states: "Green spaces also are important to mental health. Having access to green spaces can reduce health inequalities, improve well-being, and aid in treatment of mental illness. Some analysis suggests that physical activity in a natural environment can help remedy mild depression and reduce physiological stress indicators." <https://www.who.int/sustainable-development/cities/health-risks/urban-green-space/en/> NPPF 94. "It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education." - The current capacity of Greetland Academy on a split-site is well suited to the size of village. Currently, children within the village can access the school with intake occasionally taken from some surrounding villages. If over 600 new houses are built then a situation will arise in which demand will outweigh supply, families who live in Upper Greetland, and even close to the KS2 site, will be forced to leave the village and drive to other schools to find a place as they will no longer be in the catchment area. Greetland Academy is already a 2 class intake. This enables it to maintain a village school atmosphere. As an Academy this school cannot be forced to expand so where is the plan for additional school places? NPPF Paragraph 117 states - "Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land" - Is the Inspector satisfied that Calderdale has fully investigated all brownfield sites for housing purposes? Residents are not convinced this is the case! Greenbelt is being destroyed because developers are more interested in building on it! - The inclusion of this number of homes along Saddleworth road will significantly increase air pollution and I would challenge Calderdale Council to model this effect in order to understand true mitigation. This is especially serious as the location is so close to a primary school and a preschool. The locations of these schools are on the main road and at water level. We

have seen no modelling of the potential increase in harmful emissions that I am aware of and the effect this would have not only on the wider community but vulnerable school children. - The NPPF under paragraph 170e highlights that new developments should not add to air pollution. Increased car usage from over 600 new houses will lead to increased air pollution. Objective 10 in The Sustainability Assessment reports for all of these LPs in Greetland has been marked uncertain and hence these plans are not necessarily in coherence with the NPPF because the plan does not ensure that there will not be an increase.

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

Duty to Co-operate Reason:

Duty to Cooperate Under the Localism Act 2011, Section 33A "Duty to co-operate in relation to planning of sustainable development", Paragraph 3 lays out the duties required of the local council of which points a and b require preparation of local plans. Point d however calls for "activities that can reasonably be considered to prepare the way for activities within any of paragraphs (a) to (c) I question if Calderdale has sufficiently carried out all all activities needed to form a sustainable local plan with specific reference to show that release of Green Belt in LP26, LP177, LP952 and LP1625 meets exceptional circumstances?: - i.e. has all brownfield been explored as per NPPF paragraph 137? Has land recently regraded to brownfield on LP177 at the end of Ellistones Lane, and pending vacation of the Freudenberg factory been considered? It is CPRE's view after meeting local residents that they consider these brownfield sites broadly positive. - I also question if there has been adequate exploration of infrastructure requirements and mitigation for a 33.8% growth in a community? - The council has provided a Sustainability Appraisal Report. However, under preferred Option 4, 9 of the 17 objectives analysed have been marked as -"uncertain" impact. I question how fully the necessary 'activities' needed to form a sustainable plan have been carried out? e.g. risk assessment and necessary mitigation. How can a plan be sustainable and Green Belt destroyed when there are so many question marks? At a site level: LP26 has 10 uncertain impacts, 1 negative and only 1 positive LP177 has 9 uncertain impacts, 4 negatives and only 3 positives LP952 has 11 uncertain impacts, 2 negatives and only 3 positives LP1625 has 11 uncertain impacts, 1 negative and only 4 positive Disclaimer: I am a lay person, not a lawyer or planning expert and refer back to my comments under 'is the plan legal'. If these questions have been answered incorrectly or insufficiently it is due to the process having neither clarity or simplicity of use.

Suggested Modifications:

I feel that there more adequate site assessment including greater risk analysis is necessary before a site allocation of this number can be released from greenbelt and the plan deemed sustainable. Also, I'd ask the council to revisit an analysis of brownfield sites for any new and existing opportunities both in our authority and within neighbouring authorities.

Comments:

Additional Evidence Link:

Comment ID **HRU325**

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

Person ID: **954077**

Name: **Mr Matthew Hather**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Legal Objection I do not consider this plan to be legally compliant with existing flooding legislations which state that 'new development on flood risk areas would only be allowed when it is exceptionally necessary and when it does not increase the risk of flooding in the developments community or elsewhere. This development does not meet this legislation as it will significantly increase the risk of flooding to the proposed sites for the following reasons:

- o This site frequently floods and the impact for the immediate site LP0177 and surrounding areas including the proposed development sites at LP0952 and LP0026 is devastating. Not only does the brook flood but currently the water from the surrounding greenbelt land naturally flows downhill to the brook, exacerbating the situation further with the added impact of high volumes of surface water and the numerous underground springs which flow underneath numerous existing properties on Saddleworth Road.
- o 2015 floods saw this site at LP0177, Ellistones Place, Saddleworth Road suffer also as the natural drainage and soak-off which these fields provides was overwhelmed by what is becoming a more increasing weather the event. Properties on Saddleworth Road suffered flooded foundations, and in some cases water seepage upwards into rooms from underground, an impact of underground springs being overwhelmed.
- o Development of this site will most certainly place both new and existing properties at a greater risk of flooding than is current.
- o Calderdale Council Planning Department is disregarding their responsibility to have a duty of care to comply with current policy and legislation on flooding.
- o The Council's Sustainability Appraisal is in direct conflict with the proposed release of this greenbelt land for development on the site of LP0177 with the site appraisal stating that assessment of SA7 is 'NEGATIVE' and marked as 'RED' stating -"Overall the impact is negative as the site is greenfield and lies within flood zones 2 and 3"

I consider these plans to fall outside of the Governments own written policy on Green Belt land, in particular paragraph 1.39 which states: The Government wants to retain the high bar to ensure the Green Belt remains protected, but we also wish to be transparent about what this means in practice so that local communities can hold their councils to account therefore we propose to amend and add to the National Policy to make it clear that: authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including :- making effective use of suitable brownfield sites and the opportunities offered by state regeneration:- - There has been no evidence of this and planners in Calderdale's Planning Department have stated several times -"Developers do not want to build on brownfield sites" this is against government policy and does not constitute exceptional circumstances. I refer to the judicial review - Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council (2015) EWHC 1078 (Admin), Jay J - where Richard Turney appeared for the claimant "Mr Turney ... submitted that the fact that a particular site happens to be suitable for housing development cannot, without more, constitute an exceptional circumstance justifying an alteration of the Green Belt. I agree with Mr Turney insofar as this goes... Suitability simpliciter cannot logically be envisaged as an exceptional circumstances". This land is classified as "highly sensitive green belt" on the Local Plan.

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

Sound Reason:

LP0177 Sound Objection: I do not believe these plans to be sound. Â§ Site assessments on New Proposed Plan: o LP0177 ; 9 Uncertain Assessments and 4 Negative Assessments. This site was also refused planning permission in July 2019. o LP0952 ; 11 Uncertain Assessments and 2 Negative Assessments. o LP0026 ; 10 Uncertain Assessments and 1 Negative Assessment. Â§ The plans for sites LP0177 and sites LP0952 and LP0026, are highly disproportionate to the size of Greetland village. Over 600 properties, 35% of the councils target new sites (1,708 in total) are included within the Greetland Plans. Whereas Calderdale covers 140 sq miles and has a population of 210k, The proposed development area covers an estimated c. 1.5-2 sq miles and will increase Greetland population by c. 25%. With a population of c. 5.6k (Greetland and Stainland district 2018 was 11,310, source: ONS) and no sites available for Planned Local

Employment, this development will not serve to benefit the local community, but to bring -“incomers” who will not be contributing to the local employment and economy. The result of this disproportionate development will be overpopulation of the community and amenities which are not in a position to cope with such a concentrated population increase. In addition to this, the impact on the air pollution will be significant. This is already a congested area which bottlenecked by the fact that it is the only route to Halifax, Huddersfield and the M62 for residents. Impairment to traffic flow and volumes already have a detrimental impact on the infrastructure and the potential addition of an additional population of 25%, many with vehicles will fracture this already fragile infrastructure. Vehicles emit the most pollution in the first few miles of their journey, which under the site proposals will impact the Saddleworth Road corridor. This will have a detrimental impact on air pollution and the long-term health of local residents and school children. Road noise affects c. 30% of people in the UK (source: Environmental Protection UK), causing health and mental wellbeing issues. The NPPF sets out the aim of Green Belt policy which is -“to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.” (NPPF 179). Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: (i) to check the unrestricted sprawl of large built-up areas (ii) to prevent neighbouring towns merging into one another (iii) to assist in safeguarding the countryside from encroachment (iv) to preserve the setting and special character of historic towns (v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The Council, in its own evidence, concludes that the overall parcel within which the site is located performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt but, most decisively, would see the coalescence of Greetland and West Vale and the deterioration of the identity of both places undermining the Council's Settlement Hierarchy. Notwithstanding this, the quantum of housing proposed in and around the site is undeliverable during a single plan period in plan-making terms and unsustainable in infrastructure terms in relation to the capacity of existing highways, schools and local services. Local plans have not addressed Paragraph 177 of the NPPF ; Sustainability of Greenbelt sites. The area is a natural habitat for wild deer, foxes, herons, barn owls, bats, kingfishers and pheasants and the brook is healthy with wild brown trout. The impacts of urban sprawl will destroy this natural environment which includes public rights of way. These are used by community groups and attract visitors to the area for the local wildlife. Planned improved transport links away from the proposed sites will not alleviate localised congestion and air pollution as these are not within walking distance and will require transport to reach. The WSP Parsons Brinkerhoff Report on the Transport Network states that traffic congestion at the junction of Stainland/Saddleworth Roads will increase by approximately 105%, bringing in out of area travellers. This report does not take into account the impact of the increased population in Greetland which will further exacerbate the situation.

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

Duty to Co-operate Reason:

Does not comply with local policy and flooding legislation. There are no justifiable exceptional circumstances for change of use of this Green Belt land.

Suggested Modifications:

Modifications Removing this site from the local plan and retaining the existing greenbelt land. BASESD ON THE ABOVE, I DO NOT FEEL THAT THE AMENDED PROPOSALS ARE FIT FOR PURPOSE

Comments:

Additional Evidence Link:

Comment ID **HRU338**

Site ref (if applicable): **LPO177**

Person ID: **1242362**

Name: **Mrs Elaine Scott**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

It ignores all planning advice/requirements regarding environmental and social issues.

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

Sound Reason:

No proper account is taken of the following Flood risk Preservation of the wildlife corridor Congestion in West Vale Lack of infrastructure The Defra 25 year plan clearly states- We will protect ancient woodlands and grasslands, high risk flood areas and our best agricultural land. Protect our green belt to make this land a breathing space for our urban populations to enjoy and our wildlife to flourish. NPPF explains in paragraph 8 the 5 purposes of green belt land. I think this speaks for itself, any development on this site goes totally against those 5 functions and against the Defra plan.

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

Duty to Co-operate Reason:

The consultation period is minimum, very little information has been made available to local residents who therefore have insufficient time to consider, prepare and submit objections.

Suggested Modifications:

The only option is to remove this site from the plan and consider more suitable brown field sites.

Comments:

Additional Evidence Link:

Comment ID **HRU343**

Site ref (if applicable): **LPO177**

Person ID: **1239176**

Name: **MRS Jo Greidanus**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Please refer to Calderdale's Statement of Community Involvement, which has not been followed in this process. CMBC have already stated "The site 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:

Main points of objection 1 - Flooding 2 - Loss of green belt and impact on wildlife corridor 3 - Air Pollution and Traffic 4 - Infrastructure Flooding T he Council have failed to comply with policies on flood risk management. and environmental issues have been ignored by this Council which currently has a very poor Environmental track record. CMBC have already noted that a constraint of this site is that it is a HIGH RISK 3a Flood Zone. The Environment Agency defines a high-risk flood zone as one where there is a 1 in 100 chance of flooding in any given year. I have lived on Woodfield Drive next to this proposed site for nearly 18 years and in that time I have seen it severely flooded on numerous occasions, and at least once per year. I am sat writing this ojection on February 9th 2020 and currently this site is flooding again. Please see attached photo and video evidence taken between 2004 and 2019. T he flooding seen on this site is not all due to the brook bursting its banks. The site also floods further away from Black Brook due to the amount of surface water running down from the higher areas of Greetland and the natural springs in the area . Even after moderate rainfall (when the brook remains intact) there is very often a substantial flooded area right up to my garden wall and coming on to my property. (This is happening as I am writing this ojection) These areas of flooding due to surface run off can be seen on the government environment agency website that shows the extent of flooding for a particular postcode and are moderate to deep water. In the Boxing Day floods of 2015 Elland Bridge, which is directly downstream of this site, was destroyed and had to be rebuilt at a cost of £4million. The DEFRA 25 year plan states that "National flood management involves the use of a variety of measures including storing water on open land". NPPF 14 (157b) states that plans should work to safeguard land from development that is required or likely to be required for current and future flood management. The flood plains that this site provide are critical and flood regularly (as can be seen today) ; soaking up excess water at times of heavy rainfall, allowing space for the water to flow and be stored on open land in times of flood, even after the river has burst its bank, and protecting land further downstream from potential flooding. Developing this site is completely contradictory to this DEFRA plan and the NPPF. The current policy and legislation on flooding states -“due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere. Chapter 14, paragraph 163 of the NPPF states: -“ When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere It is abundantly clear that any development on this site would directly oppose all these pieces of legislation and policies and would hugely increase the risk of flooding to both surrounding properties and the wider community. Any development of this site and reduction in the the capacity of this flood plain will only ensure that the flooding we now see will be more frequent and cause even more damage.This is not acceptable or fair therefore this site should be removed from the local plan. Loss of Green Belt and Wildlife Corridor Esther McVey, our current Housing Minister's written policy on Green Belt land states "protecting the Green Belt goes beyond protection against development" NPPF chapter 13 states that there are 5 purposes to green belt land - CMBC has already stated that this land strongly fulfills these 5 purposes. NPPF ch13 paragraph 143 states "Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances". Protecting the green belt is very important. To include this site in the local plan goes against all the above policies and there is no evidence of any special circumstances to support development on this land. This site is a wild life habitat for many many different species. CMBC has already stated that a constraint of this site is that Black Brook running through the site is a UK BAP priority habitat. NPPF Chapter 15 states that planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes and sites of biodiversity. It also states - toprotect and enhance biodiversity

and geodiversity, plans should: identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including wildlife corridors. Developing this site will put this precious wildlife corridor and all its inhabitants at great risk directly opposing the NPPF legislation and the DEFRA 25 Year Plan. This site should therefore be removed from the local plan. Air Pollution and Traffic Congestion Air pollution and traffic congestion obviously go hand in hand. The junction of Saddleworth Road and Stainland Road in West Vale is already a bottle neck and far too congested and unable to cope with the traffic volume that passes through it on a daily basis. WSP Parsons Brinckerhoff Report on this Transport Network identifies that "£ traffic congestion at the juncture of Stainland Road-Saddleworth Road would increase by approximately 105% "£ traffic congestion at the juncture of Stainland Road-Rochdale Road would increase by over 100% Public Health England (PHE) (11th March 2019) reports that air pollution is the biggest environmental threat to health in the UK, with between 28,000 and 36,000 deaths a year attributed to long-term exposure. There is strong evidence that air pollution causes the development of coronary heart disease, stroke, respiratory disease and lung cancer, and exacerbates asthma. Professor Paul Cosford, Director of Health Protection and Medical Director at PHE, said: "Now is our opportunity to create a clean air generation of children Key interventions local authorities can take include: redesigning cities so people aren't so close to highly polluting roads." Professor Cosford said: We recommend that at a local level, any new policy or programme of work which affects air pollution should aim to deliver an overall benefit to the public's health. Greetland School and Sunnybank Pre school are right on Saddleworth Road at the boundary of this site. The increase in traffic of over 100% and therefore pollution that will be an outcome of development on this site ignores all the recommendations of PHE and put many peoples health at risk especially that of our children which is totally unacceptable. Infrastructure Greetland Primary Academy, West Vale Primary School and Brooksbank High School are all full. With a proposed 600 houses, using Calderdale MBC's figure for school places of .36 per household (IDP section 9.14) this indicates another 206 school places would be needed. Where are these places to be found? Local Dentist has a waiting list of 600 for NHS places. The nearest NHS dentist was recently found (July 2019) 11 miles away in Kirklees. Local GP surgeries are already full. It is obvious that building a further 600 houses within this area will completely overwhelm the existing infrastructure making this land unsuitable to develop. Summary There are so many constraints and negatives to this site that cannot be adequately mitigated against. To develop this site opposes so many policies, recommendations and pieces of legislation which CMBC appear to have given little/no consideration to. I respectfully ask that this site is removed from the Local Plan. It should never have been included as it is completely unsuitable for numerous reasons In the 2hrs it has taken me to write this objection, this site - LP0177 - has turned from a field into a lake showing this CRITICAL FLOOD PLAIN in action. As this portal is difficult to use and I have struggled to attach the photo evidence of flooding that I have mentioned, I will be emailing my objection with photos attached

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

Duty to Co-operate Reason:

Poor Public notification and little time allowed for proper consultation.

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5600224> ; <http://calderdale-consult.objective.co.uk/file/5600223> ; <http://calderdale-consult.objective.co.uk/file/5610060> ; [http://calderdale-consult.o](http://calderdale-consult.objective.co.uk/file/5610061)

Comment ID **HRU346**

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

Person ID: **1242408**

Name: **Miss Bryde Town**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Please see attached PDF

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

Sound Reason:

Please see attached PDF

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

Duty to Co-operate Reason:

Please see attached PDF

Suggested Modifications:

N/A - this site needs to be removed.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5600227>

Comment ID **HRU368**

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

Person ID: **1242401**

Name: **Mr graeme britteon**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Housing is now planned for areas of Greetland that were originally in the Green Belt. How has Calderdale Council managed to alter Green Belt area boundaries in such a way as to remove areas from protected Green Belt status? Calderdale Council is basing its estimate of the future need for houses on out-dated information. As we are no longer members of the EU it should revisit those estimates. Mitigating the contribution of the site to the elements which contribute towards the significance of Bradley Hall Farmhouse, a grade II listed building sitting 35 metres to the south of the proposed site, by suggesting a 'slight buffer zone' and ensuring that 'trees remain for screening' is wholly inept. Ref. Greenbelt Site Survey Form for LP0177 'Land adjacent Ellistones Place' Calderdale Council have not made residents aware of the need to resubmit objections to the latest version of the plan and of the deadlines for this. This information has only become available through the grapevine. This is not how a fair, honest, and transparently open council should conduct itself. The last plan showed this site as a class 1 Severe Risk Flood area but in the

site assessment report the area is marked as an Amber on the flooding RAG with the comment: 'Flooding issues which can be mitigated. This site is a natural flood plain and acts as a very necessary soak away area to prevent serious flood damage to housing and businesses in West Vale. Any houses built on this land would not only be liable to flooding but would exacerbate potential flood damage further down the valley and into West Vale and beyond. To comply with current legislation this site should be removed from the plan. The Council appears to have done little to comply with NPPF guidelines on Identifying Land for Homes, in particular, item 68 to 'promote the development of a good mix of sites' and identify more suitable brownfield sites. The value of 'Open Space and Recreation' and 'Access to a network of high quality open space' NPPF 96-98 gets no recognition other than in the Environmental Health section of the Site Assessment Report which states that 'There is no significant detrimental effect that cannot be mitigated against'. How can Calderdale Council mitigate against the loss of Greenbelt land, the loss of open spaces and valuable countryside on our doorstep, and all the loss of all the environmental benefits that are provided by them and which are currently enjoyed by your local community?

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

Sound Reason:

Calderdale Council's own site assessment report states: 'This is a sloping greenfield site in agricultural use (Grade 3 in the Agricultural Land Classification) on the southern side of Greetland having its northern and eastern boundaries in common with the edge of the existing settlement. It is separated from the main part of Greetland by Saddleworth Road. It currently lies within the Green Belt and Wildlife Corridor designations in the RCUDP. It also lies within the Mineral Safeguarding Area for stone, but outside the Mineral Safeguarding Area and Buffer for coal. The topography of the site, in a natural depression of the land, would ensure the visual impact of development would be lessened when viewed from the nearby Stainland Road. The location has reasonable access to a range of services and facilities although it is more than 400m from a bus stop with a service at least every 30 minutes, and more than 2km from the nearest railway station. Regarding the Green Belt designation, 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 Highways England have stated that there will be no impact on the strategic highway network, but cumulative effects of development could impact on Junction 24 of the M62. The West Yorkshire Infrastructure Study identifies that further capacity enhancement will be needed 2022 and 2030 to deal with cumulative impact. Site access is achievable, however junction mitigation may be required depending on results of a full Transport Assessment and operational assessment of local road network. Any scheme would need to address the potential flooding issues resulting from Black Brook and smaller water courses crossing the site as well as run off from hard surfaces. JBA Consulting have recommended that the Exception Test is required. The developability of the southern part of the site should be assessed with regards to reducing flood risk to future residents. There are also ecological constraints with regards to Black Brook. It is a UK Biodiversity Action Plan Priority Habitat, and negative impacts can be mitigated against by the introduction of a 10m standoff to reduce disturbance. Trees on and around the fringes of the site will also need considering in any layout and design as will that part of the site falling within the Wildlife Habitat Network around the south-western part of the site. Grade II Listed Bradley Hall Farmhouse lies to the south of the site across Black Brook. A Heritage Impact Assessment will be undertaken to assess the potential harm and to also identify mitigation measures to minimise the harm. It may be likely that measures to minimise impacts on Black Brook and to reduce flood risk will also contribute to mitigating negative effects to Bradley Hall Farmhouse. Measures will also be required to address the effects of any development on the potential presence of archaeological remains. Predetermination archaeological evaluation will be required. There is currently a campsite/caravan site on part of the site; if this is to remain in operation, Environmental Health have stated that there needs to be adequate separation between any residential development and the campsite area. The sustainability appraisal recommends that on site green and blue Infrastructure such as SuDS and

green roofs to reduce the infiltration rate of precipitation as well as provide storage for storm water run-off. Whilst this site is subject to the constraints discussed above these can generally be mitigated. Therefore, the Council's preferred use of the site is a New Housing Site with an indicative capacity of 279 dwellings although given the environmental constraints this is likely to be reduced.' Outcome: New Housing Site The overall assessment highlights all the reasons why this site should not be designated for housing and then seeks to mitigate those reasons. Nowhere do I see any positive reasons for selecting this site for housing development! Particularly galling are the comments: 'The topography of the site, in a natural depression of the land, would ensure the visual impact of development would be lessened when viewed from the nearby Stainland Road.' The visual impact would not be lessened from most of the residential areas of Greetland overlooking the valley bottom! And: 'Regarding the Green Belt designation, 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 also ecological constraints with regards to Black Brook. It is a UK Biodiversity Action Plan Priority Habitat.' Surely these are really valid reasons to not include this site in the plan. There are several other issues with the soundness of the plan for this site which are also applicable individually and in total to all the sites in the Greetland area that have been earmarked for housing development: They are all Greenfield (and originally Greenbelt) sites. There is a disproportionate allocation of land for housing in the Greetland area within the Elland region with Stainland not being allocated any housing at all. The traffic congestion issues, already evident on Saddleworth Road and Stainland Road, do not appear to get any significant recognition in the plan and adding 600 houses at the side of Saddleworth Road will only serve to exacerbate the problems. The potential increase in car journeys in the area will undoubtedly contribute to increased air pollution, particularly effecting vulnerable young children walking to and attending the local school at the side of Saddleworth Road. The existing infrastructure barely meets the needs of the current population of Greetland so increased capacity of schools, dentists, and GP surgeries would be needed to service such a significant increase in the local population. Large open spaces are needed for the mental and physical health and well being of all. Urban sprawl has many negative consequences for residents and the environment. The wooded valley walkway along the side of Black Brook provides a popular area for many of the local residents to enjoy leisure activities (walking, running, cycling etc.) away from the rigors of everyday life and free from traffic and air and noise pollution, yet within walking distance of existing communities. Site LP0177 has also recently been refused planning permission (5th July 2019). There are no justifiable exceptional circumstances for change of use of this area of Greenbelt land.

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

Duty to Co-operate Reason:

Suggested Modifications:

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

Comments:

Additional Evidence Link:

Comment ID **HRU389**

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

Person ID: **1242391**

Name: **Mr Howard Campbell**

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 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 fields LP0177 Ellistones Place Saddleworth Road, Greetland suffered severe flooding (pictures attached). The flooding was so severe by Woodfield Drive that one resident was able to paddle his canoe on it. Any building on this land would cause flooding of the houses at Woodfield Drive and in West Vale and therefore does not comply with current flooding policy and legislation as outlined above. Calderdale Council Planning Department has a duty of care to comply with current policy and legislation on flooding. Furthermore several months ago Saddleworth Road adjacent to these fields burst as it was unable to absorb the water flow and the road had to be closed off for several days contributing to a car accident on this busy road (this is not the first time water has forced it's way through the road causing disruption). 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, current Housing Minister's written policy on Green Belt land and quote: -“My department is working with DEFRA (Department of Environment, Food & Rural Affairs) and Natural England on the once-in-a-generation Environment Bill which will establish a comprehensive legal framework for environmental improvement and make net gains for biodiversity mandatory for new development. Of course one of the most important environmental safeguards we have is the Green Belt. And I want to be clear that our commitment to this is as strong as ever, with any changes only happening in exceptional circumstances ; protecting the Green Belt goes beyond protection against development”- Exceptional circumstances in The Government White Paper -“Fixing our Broken Housing Market”-Parag 1.39 states that: The Government wants to retain the high bar to ensure the Green Belt remains protected, but we also wish to be transparent about what this means in practice so that local communities can hold their councils to account therefore we propose to amend and add to the National Policy to make it clear that: authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including :- making effective use of suitable brownfield sites and the opportunities offered by state regeneration:- - There has been no evidence of this and planners in Calderdale's Planning Department have stated several times -“Developers do not want to build on brownfield sites”- this is against government policy and does not constitute exceptional circumstances. I refer to the judicial review - Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council (2015) EWHC 1078 (Admin), Jay J - where Richard Turney appeared for the claimant "Mr Turney ... submitted that the fact that a particular site happens to be suitable for housing development cannot, without more, constitute an exceptional circumstance justifying an alteration of the Green Belt. I agree with Mr Turney insofar as this goes .. Suitability simpliciter cannot logically be envisaged as an exceptional circumstances". -This land is classified as "highly sensitive green belt" on the Local Plan. In 2016 regarding the first Local Plan a petition with 161 signatures objecting to building on our beautiful Green Belt was presented to Calderdale Council Planning Department and 30% of the total objections submitted from the whole of Calderdale residents were from the Greetland area alone. - This appears to have been ignored. 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. Accordingly, this site in the existing Green Belt should be removed from the Plan as the exceptional circumstances for its release do not exist. 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. Duty to Co-operate Do you consider that the plan complies with the Duty to Co-operate No 1) Does not comply with current policy and legislation on flooding. 2) There are no justifiable exceptional circumstances for change of use

of this Green Belt land. Sent from my iPad

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. The NPPF sets out the aim of Green Belt policy which is -“to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”(NPPF 79). Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: (i) to check the unrestricted sprawl of large built-up areas (ii) to prevent neighbouring towns merging into one another (iii) to assist in safeguarding the countryside from encroachment (iv) to preserve the setting and special character of historic towns (v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The Council, in its own evidence, concludes that the overall parcel within which the site is located performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt but, most decisively, would see the coalescence of Greetland and West Vale and the deterioration of the identity of both places undermining the Council's Settlement Hierarchy. Notwithstanding this, the quantum of housing proposed in and around the site is undeliverable during a single plan period in plan-making terms and unsustainable in infrastructure terms in relation to the capacity of existing highways, schools and local services. Accordingly, this site in the existing Green Belt should be removed from the Plan as the exceptional circumstances for its release do not exist. 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:

1) Does not comply with current policy and legislation on flooding. 2) There are no justifiable exceptional circumstances for change of use of this Green Belt land.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU43**

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 development'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 therefore 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 explanation 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 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". 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 Council (2015) EWHC 1078 (Admin), Jay J - where Richard Turney appeared for the claimant "Mr Turney ... submitted that the fact that a particular site happens to be suitable for housing development cannot, without more, constitute an exceptional circumstance justifying an alteration of the Green Belt. I agree with Mr Turney insofar as this goes .. Suitability simpliciter cannot logically be envisaged as an exceptional circumstances". 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. Current legislation re building on high risk flood area: <http://www.environmentlaw.org.uk/rte.asp?id=105>

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 legislation 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/5588833> ; <http://calderdale-consult.objective.co.uk/file/5591015>

Comment ID **HRU449**

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

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 don't believe that Calderdale Council have allowed enough time for residents to organise a response. I was also told by 2 Councillors for our area, that they were not make aware of meetings and decisions in a timely manner

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

Sound Reason:

This is not a sound decision. I do not approve of Calderdale plans for building houses on this plot, and other plots on the Greetland Greenbelt. The area in question is part of the Greetland Greenbelt . It complies with 3/5 Green Belt criterion. The Government have pledged to stop building on the Greenbelt. Calderdale has not demonstrated that all other avenues for housing have been exhausted. There is no evidence that Calderdale have considered Brown Field sites. There are many empty buildings, derelict plots and other land that should be used. Apparently the Council feel that building on this site is warranted

because There is a housing emergency, and they feel that this exempts them. But the need for these extra houses is based on very optimistic economic growth, which does not appear to have been fully accounted for. The Green Belt was put in place to protect the countryside, create a place for leisure and recreation, to provide a barrier to prevent Urban Sprawl , to stop unrestricted sprawl bleeding into neighbouring towns and villages. Planning on this land abuses those directives. LP0177 is prone to Flooding. This has happened several times already. Only this week (9-11th February 2020) Black Brook has flooded extensively into the surrounding fields. To allow Houses to be built on this land is stupid. We are just witnessing large parts of the Calder Valley in flood measures, it would be more than folly to build here, it would be disastrous. The wildlife will be affected. We have numerous species on this land: barn owls, hedgehogs, jays, bats and many bird species in this area. Traffic Congestion along the Saddleworth Road is already compromised, by the volume of existing traffic and the inevitable bottleneck at West Vale. Building 200 houses in this plot will contribute to possibly another 500 vehicles using the road. This will contribute to air pollution as well. On the report, it suggested that driving time from Saddleworth Road to Halifax Rail Station would take 14 minutes. This is completely unrealistic - a more accurate time would be 30-35 minutes in peak times, so with extra traffic this would become untenable. The infrastructure is already inadequate with the Doctors, Dentists and schools already full.

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

Duty to Co-operate Reason:

I don't even know what this means The Council has an obligation to make its opportunities for consultation understandable. I don't believe the jargon, access to information, consultation, form filling or internet access for all the residents has been made clear.

Suggested Modifications:

do not build on this plot of land

Comments:

Additional Evidence Link:

Comment ID **HRU450**

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

Person ID: **1242594**

Name: **Mrs Jean Waterhouse**

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 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 and also on 8/2/20 the fields LP0177 Ellistones Place Saddleworth Road, Greetland suffered severe flooding. Any building on this land would cause flooding of the houses at Woodfield Drive and in West Vale and therefore does not comply with current flooding policy and legislation as outlined above. Calderdale Council Planning Department has a duty of care to comply with current policy and legislation on flooding. Furthermore several months ago Saddleworth Road adjacent to these fields burst as it was unable to absorb the water

flow and the road had to be closed off for several days contributing to a car accident on this busy road (this is not the first time water has forced its way through the road causing disruption). 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. In July 2019 planning was turned down due to the flood risk and insurance was refused on a static caravan on this site. 2) I draw your attention to Esther McVey, current Housing Minister's written policy on Green Belt land and quote: "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 referred to "scrub land" being wrongly classified as the type of Green Belt that should be considered for change not a wildlife corridor as this land is that meets all the 5 Green Belt tests and she has provided £2 million pounds worth of funding for Councils to employ Enforcement Officers to prevent this kind of malpractice arising and Calderdale Council is one of the Councils on the list of recipients of £50,000. - Therefore I find it baffling that this is not being put into practice. Exceptional circumstances in The Government White Paper - "Fixing our Broken Housing Market" - Para 1.39 states that The Government wants to retain the high bar to ensure the Green Belt remains protected, but we also wish to be transparent about what this means in practice so that local communities can hold their councils to account therefore we propose to amend and add to the National Policy to make it clear that: authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements including :- making effective use of suitable brownfield sites and the opportunities offered by state regeneration:- Horsfall Mill in West Vale meets NPPF rules as it is a brownfield site and will provide "the right houses in the right places" in accordance with central government legislation, this site needs to be placed back on the Local Plan. I refer to the judicial review - Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council (2015) EWHC 1078 (Admin), Jay J - where Richard Turney appeared for the claimant "Mr Turney ... submitted that the fact that a particular site happens to be suitable for housing development cannot, without more, constitute an exceptional circumstance justifying an alteration of the Green Belt. I agree with Mr Turney insofar as this goes .. Suitability simpliciter cannot logically be envisaged as an exceptional circumstance". - This land is classified as "highly sensitive green belt" and NOT green field as stated on the Local Plan - this is misrepresentation. - On the Local Plan Greetland has been incorporated in with Elland - this is misrepresentation; Elland is a town and is HX5 whereas Greetland is a village HX4. This is an attempt to hide the large volume of building in a 1/2 mile area of a small village.

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. The NPPF sets out the aim of Green Belt policy which is - "to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence." (NPPF ¶79). Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: (i) to check the unrestricted sprawl of large built-up areas (ii) to prevent neighbouring towns merging into one another (iii) to assist in safeguarding the countryside from encroachment (iv) to preserve the setting and special character of historic towns (v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The Council, in its own evidence, concludes that the overall parcel within which the site is located performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt but, most decisively, would see the coalescence of Greetland and West Vale and the deterioration of the identity of both places undermining the Council's Settlement Hierarchy. Notwithstanding this, the quantum of housing proposed in and around the site is

undeliverable during a single plan period in plan-making terms and unsustainable in infrastructure terms in relation to the capacity of existing highways, schools and local services. Accordingly, this site in the existing Green Belt should be removed from the Plan as the exceptional circumstances for its release do not exist. Furthermore the proposed site does not meet national policy with regards to flooding as detailed above. Clean Air Policy ; even higher numbers of traffic would cause further pollution in what is already a bottleneck area of high congestion with Sunnybank Nursery and Pre school playground just a few feet away from the busy congested road putting the health of our children at risk. Diesel lorries regularly use this road e.g. Sonoco emitting high levels of diesel fumes with the particles of diesel fumes affecting young children first because their particles fall close to the floor. It was on the news today how damaging this is to children's health who are at risk of losing 10% of their lung capacity. - Calderdale Council has adopted the Clean Air Policy 2018 and these findings are against this policy. Greetland has been incorporated with Elland, whereas the likes of Mytholmroyd, Ripponden and Brighouse all stand alone. I feel the the Council have done this to hide the fact of the disproportionate amount of building they have allocated to Greetland, for example Elland which is the Portal you have to go into to access Greetland is split into six parcels, out of the six, four of the allocated slots are for Greetland: LP0026, LP0177, LP0952 and LP1625 all up Saddleworth Road and within half a mile radius. Greetland is a community in its own right and when shown the amount of building proposed in this one small area it is totally disproportionate. This leads to urban sprawl which is against NPPF policy.

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

Duty to Co-operate Reason:

1) Does not comply with current policy and legislation on flooding as any build on this land would lead to flooding in surrounding areas; if the water is funnelled away the only place it can go is West Vale which would surely flood. 2) There are no justifiable exceptional circumstances for change of use of this Green Belt land; by Calderdale Council own assessment it is highly sensitive Green Belt land and meets all 5 purposes. 3) This is already a highly congested road; adding further traffic would be putting our children's health and well-being at risk. 4) This is a most unsuitable site for development with the flooding, nursery playground only 3 feet from the roadside, highly sensitive Green Belt and a wildlife corridor. 5) NPPF rules have not been adhered to as the brownfield site at Horsfall Mill in West Vale needs to be put back on the Local Plan; it is in an ideal location for affordable housing being close to shops, doctors, dentists, eateries, bowling, cricket, park, North Dean Woods, model car racing, rugby and football ground and has an excellent bus service to neighbouring towns.

Suggested Modifications:

N/A

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5602713>

Comment ID **HRU454**

Site ref (if applicable):

Person ID: **1242613**

Name: **Ms Rowena Burton**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

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

Sound Reason:

The proposals are not sound for any of the designated sites in Greetland for the following reasons:- The prediction of economic growth is based on out of date figures (2016) which were pre-Brexit. It is difficult to see where 600 new households in Greetland would find employment locally; it is more likely that we would be a dormer village serving Manchester and Leeds. When development is proposed, there is talk of affordable housing and best use of space, but in reality, developers are not held to account - all we see in this area are executive 4 or 5 bedroom homes that take up lots of space and don't serve the community. Most egregiously, the plans go against the NPPF's Green Belt policy: there would be -"unrestricted sprawl"- "merging of neighbouring towns" and no -"safeguarding the countryside from encroachment." West Vale and Greetland would become a huge housing estate without amenities, no sense of community, no visual amenity and no Green belt land for recreational purposes. There are still unused brownfield sites in Calderdale (including West Vale) so there is no evidence that there is an - "exceptional circumstance" to take away the Green Belt for ever, especially in an era when every person and institution should be doing their best to mitigate the effects of climate change. Development on Green Belt completely undermines your vision of -"a preserved, enhanced natural landscape," p.26 of the Local Plan Vision. People who live locally don't want to and should not have to travel on a daily basis to another recreational Green Belt area in Calderdale when they currently have open space and a wildlife corridor on the doorstep. The contention is that the proposed development is sustainable, but nothing could be further from the truth:- Currently, there are long traffic queues at the traffic lights in West Vale (at both Saddleworth rd and Rochdale rd junctions) and not just in the morning and at the end of the working day. Road improvements on the A629, A58 and M62 will not help this situation as residents and those from outside the area forced to come through Greetland have to brave West Vale before reaching the improved road systems; indeed the improvements could engender more traffic keen to travel to bigger urban areas. The roads in the villages are single track with no viable prospect of changing to dual carriageway. 600 houses would involve at least 1,200 more vehicles on the roads leading to West Vale. Tinkering with the sequencing of traffic lights isn't going to help. It is already possible to smell and taste the air pollution on the approach to West Vale at busy times. A huge increase in the volume of traffic can only have a detrimental effect on the physical and mental well-being of residents. Levels of pollution may be illegal - when was a study last carried out? The Council could already be in contravention of the Clean Air Strategy 2018. The schools (primary and secondary) and doctor's surgery are already oversubscribed. There is nothing in the plan to remedy this situation or the fact that regeneration in West Vale has been about restaurants and night-life and not about catering for the every day needs of the vast numbers of prospective new families in the area, were the plan allowed to go ahead. On page 24 of your initial Local Plan Vision you commit to -"ensuring the risks of flooding are significantly reduced." Building houses in Greetland flagrantly contradicts this intent. The lower areas of the proposed sites act as flood plains and uncharted springs and water courses are everywhere on the hillsides. Engineers who dealt with our flooding on Scar Bottom Lane in 2015 (the water from here then flooded properties and land below in Saddleworth rd environs - it has to go somewhere) said it would be very unwise to build on the hillsides or the flood plains as the water course is so unpredictable. Every year in this area, private property and land is flooded, but different people are affected because the course of the water changes. Losing the flood plains would cause a back-up of water further up the hillside and the loss of green land to development would mean more flooding as there would be nothing to absorb it on its journey. Stop press: the most recent flooding on 9/2/2020 clearly demonstrates why taking away Greenbelt land is reckless. We have had localised flooding on Scar Bottom lane for months now. The developers who own the land have failed to mend infrastructure which would have ameliorated the situation so the Council kindly agreed to sub-contract a firm to mend the pipes. The road was dry for a week until Ciara struck and demonstrated how

the whole area is vulnerable to flooding.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU461**

Site ref (if applicable): **Lp0177**

Person ID: **1140261**

Name: **Mrs Jen Clutterbuck**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Flooding and flood plain , our awful recent flooding just proves this, with all this area affected. It would be absurd to build on here as residents would be flooded and it would not be a question of if, but when. Many people have photographic proof of this flooding and will be used as evidence. Greenbelt - our wildlife and greenbelt areas are precious and this area aswell as other areas in the plan are well used for walking and enjoying our great outdoors. There are hedgehogs, badgers, bats, foxes, deer all resident in this area. Some are protected. There are far more areas that an be built on instead of destroying this land for the wonderful people of greetland and surrounding areas who love it, aswell as our wildlife . Air quality - the roads are already congested in this area and it would all add to it

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 **HRU470**

Site ref (if applicable):

Person ID: **1242431**

Name: **Mrs Nicola Boon**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

1) Disproportionate amount of building in the Greetland area. The latest revisions to the local plan are deeply unsustainable development particularly the fact that a disproportionate amount of new homes are proposed on four sites in Greetland which for the plan is grouped under Elland. Within the plan 1,708 new housing sites have been proposed within the Elland area with 1,041 of these units (over 60%) proposed in Greetland when there are other sites available which won't place as much collective strain on one village.

2) Additional Flood risk LP0026 -Currently this site provides a natural overland flow storage area prior to it flowing over Saddleworth road down into Black Brook. It was evident on Sunday 9/2/20 following the rainfall similar to the 2015 Boxing Day floods that any hard landscaping/alterations to the natural characteristics of this area would provide further runoff onto Saddleworth Road and subsequently Black Brook. This land is vital absorption area to prevent overland flow therefore it is strongly advised not to develop on this piece of land. LP0177 / LP0952 / LP1625 All three of these parcels have demonstrated their unsuitability for development during Storm Ciara 8/2/20 & 9/2/20 whereby rainfall levels were close to the 2015 Boxing Day floods. Water has been visibly running over ground and within the ground down the sloping nature of the land down to Black Brook causing flooding to the properties along Black Brook and also contributing to the already at capacity River Calder causing extensive flooding. Parcel LP0177 which clearly lies with Flood Zone 3a has been particularly affected today with extensive flooding. Development will not ease or mitigate this flood risk as there is no substitute for nature's only defence within periods of rainfall which is a floodplain which this last is! The other two parcels did not necessarily flood to the same extent however the flow of water which these fields were taking today, from higher up the valley and Saddleworth Road runoff, provided important lag time to this flow further working with this natural defence mechanism which the valley holds currently. Development would destroy this natural defence barrier and also disturb the watercourses which aren't visible above ground such as the minefield of uncharted natural springs ; which from local knowledge have been re-routed following excavation for developments causing issues elsewhere in the village. No amount of development engineering will be able to improve the hydrology of this valley. See photos below of Black Brook from 9/2/20

3) Sustainable development These pieces of land are clearly within an area of Greenfield and is a natural break in the boundary of the village into the countryside leading up to Barkisland with only existing farmsteads currently situated on the land. If these parcels are to be developed it would not be a sustainable development, it would merely be urban sprawl of a village. Sustainable development would be re-using Brownfield sites not Greenfield sites which are available in West Vale or less sensitive areas in Stainland which were removed from the previous Local Plan.

4) Traffic impacts West Vale is currently at breaking point with the amount of traffic which passes through on a daily basis therefore why would the situation improve with a further 600 homes. West Vale is a vital access route for the valley and surrounding towns and villages and with additional vehicles, a natural bi-product of development, would become dangerously congested. There is no obvious solution to ease the pressures of traffic on West Vale and despite attempts in process of improving the A629 junction, Rochdale Road crossroads still this doesn't make it acceptable to subject near double the number of vehicles as research shows below. WSP Parsons Brinckerhoff Report on Transport Network states that: "£ This report identifies that traffic congestion at the junction of Stainland Road-Saddleworth Road would increase by approximately 105% "£ This report also identifies that traffic congestion at the juncture of Stainland Road-Rochdale Road would increase by over 100%

5) Impact on Air Quality This undoubtedly will deteriorate with the development of any of these parcels due to increased traffic from both construction and occupants. This is why there is a need to plant more trees within the

Ward. This will be negated by the building of so many houses. The current air quality needs to be assessed.

6) Infrastructure As a resident of Greetland who drives along Saddleworth Road and Brian Royd Lane daily I believe that the existing infrastructure of the village would not cope with the additional development proposed. Over the last few years there has not been a month gone by whereby there has not been a water main burst on Saddleworth Road due the aging cast iron water main which has still not been upgraded fully causing regular traffic disruption. The road itself is poorly maintained by the council and now you are wishing to subject to road to all the construction related traffic which would be as a result of development and furthermore the occupants upon its completion. Local Schools are all full - both Greetland Academy and Brooksbank, Elland. The land allocation has not made any reference to providing land for expansion of the Key Stage 1 site on Saddleworth Road which would be effectively surrounded by LP0177. Our children of Greetland would lose the rural outlook and ability to be taught about this vital wildlife corridor and would end up being brought up and educated in an urban environment ; as a parent of a Key Stage 1 pupil this outlook and important wildlife corridor was one of the attractive qualities of the Greetland Academy. With a proposed 600 houses, using Calderdale MBC's figure for school places of .36 per household (IDP section 9.14) this indicates another 206 places would be needed. Local Dentist has a waiting list of 600 for NHS places. The nearest NHS dentist was recently found (July 2019) 11 miles away in Kirklees. The GP Surgery would be strained to take this proposed capacity given when the practice is already on a waiting list basis for new patients with patient levels already at 11,334 patients in 2019 covered by 5 doctors. There would also be a further strain on local Hospitals. On the basis of the above points I strongly advise that the greenfield sites within Greetland are removed from the Local Plan in favour of more suitable sites.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5602888>

Comment ID **HRU475**

Site ref (if applicable):

Person ID: **1242405**

Name: **Mr Michael Bridgman**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

This proposed large development will clearly contribute to the unsustainable overall plan for this area. The development will result in a disproportionate level of new homes in the Greetland area exacerbating the already creaking infrastructure. This includes lack of school places, limited access to doctors and other medical services, poor public transport facilities and unacceptable levels of traffic congestion. Undoubtedly

the health and safety of Greetland residents and visitors will be affected negatively by this development. Pollution levels are very high now never mind if a significant number of proposed dwellings are added to the area when the levels would become dangerous. Access onto an already busy Saddleworth Road would become less safe with the large number of additional vehicles which would result from this, and other similar, proposed developments in the area Flooding is very much in the news at present. If this development is allowed to go ahead it will, due to its position close to the beck and to Green Belt, add to this increasing problem in this and other parts of this constituency. Quality of life and the safety and security of Greetland residents and those further down the valley in Elland and Brighouse deserve much better appreciation, recognition and support from the Council There is no doubt that our nation needs more housing and more significantly more affordable housing but the Greetland developments will contribute to increases in pollution and flooding, and to the erosion of environmental benefits for our community.

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 **HRU498**

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

Person ID: **1241765**

Name: **Mrs Sandra Britteon**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I don't honestly know if the plan is legally compliant. How would I? I am not a lawyer. If it is legally compliant then it should not be! The plan involves allowing development housing in our Green Belt areas. Areas that have been, and should always be, protected. Protected from the conglomerate developers that seek to destroy our communities, steal our green tranquil spaces, and make profits at all costs. The site assessment for LP0177 shows that out of 17 Sustainability Assessments, the allocation has 9 Uncertain Assessments and 4 Negative Assessments. Under 'Proposals affecting the Green Belt' NPPF Para 143 it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' There are no justifiable exceptional circumstances for change of use of this area of Greenbelt land. Calderdale Council do appear to recognize some harmful elements harmful to the Green Belt in their plan but they offer little in the way of mitigation against that harm. The plan seems to give little value to 'The value of 'Open Space and Recreation' and 'Access to a network of high quality open space' and the Environmental Health section of the Site Assessment Report states that 'There is no significant detrimental effect that cannot be mitigated against'. How can Calderdale Council mitigate against the loss of Greenbelt land, the loss of open spaces and valuable countryside on our doorstep, and the decimation of all the environmental benefits that are provided by them and which are currently enjoyed by your local community? These green spaces are very very important to me and my family and I would hope that they can be valuable to generations to come. Calderdale Council have failed to

demonstrate how the Local Plan will enhance those areas where development is proposed and that the development will not adversely affect the existing local communities and the environment in which they live. I feel that these plans have not properly considered the needs of the local community and it is my strong belief that they will negatively impact upon our environment and our quality of life in Greetland.

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

Sound Reason:

There are several issues with the soundness of the plan for this site which are also applicable, individually and in total, to all these sites (LP0026, LP0177, LP0952, and LP1625) in the Greetland area: All these sites are marked as Greenfield but should, in truth, be marked as Green Belt sites. All perform strongly against the 5 Green Belt purposes. As such they should be designated as 7th or 8th on the list of suitable sites according to Calderdale Council's own Sustainability Appraisal 2018 document. The land earmarked for housing in the Greetland area falls within the wider Elland region and there is a disproportionate allocation to Greetland than other parts of the Elland region, with Stainland not being allocated any housing at all. There is a significant risk that 'Urban Sprawl' will further nibble away at the surrounding countryside and there will be many negative consequences for residents and the environment, such as higher water, air, and noise pollution, increased traffic fatalities and congestion, and increased car dependency. The development of these sites would be against all five functions of Green Belt and, most decisively, would mean the coalescence of Greetland and West Vale and the deterioration of the identity of both places, thus undermining the Council's Settlement Hierarchy. The traffic congestion is already a major problem at the junction of Saddleworth Road and Stainland Road and at the junction of Rochdale Road and Stainland Road. Recent road works have a major devastating effect on travel times through these two overstretched junctions. Adding 600 houses at the side of Saddleworth Road will only serve to exacerbate these problems. Air pollution is another issue that will be affected by such a large scale addition of houses in a relatively small space along side a single main road. The potential increase in car journeys in the area will undoubtedly contribute to increased air pollution which will particularly affect vulnerable young children walking to the local school at the side of Saddleworth Road. The existing infrastructure struggles to meet the needs of the current population of Greetland so increased capacity of schools, dentists, and GP surgeries would be needed to service such a significant increase in the local population. Sewers are already prone to flooding and overflowing causing further health hazards. The area around these four sites is mainly Grade 3 agricultural land which by Calderdale's own recognition in the Sustainability Report will become an increasingly important commodity in the light of climate change. The Woodland Trust has recently supported an application for the donation of over 100 indigenous trees specifically recommended for this area. Due to the natural and undisturbed environment in this area of Greetland there is a wonderfully diverse richness of flora and fauna. My husband and I have seen owls, sparrowhawk, kestrels, heron, kingfishers, dippers, nuthatches, pheasant, and woodpeckers. I have seen foxes, deer, stoats, weasels, and moles, in the fields above Black Brook and observed brown trout in the brook itself where we have also enjoyed discovering and frogs, toads, and newts. We have often watched the bats flying around our garden in the late summer evenings. Development here would eradicate a number of species who are reliant upon the Eco system which currently exists here. There are also ecological constraints with regards to Black Brook as it is a UK Biodiversity Action Plan Priority Habitat. The area around these four sites is mainly Grade 3 agricultural land which by Calderdale's own recognition in the Sustainability Report will become an increasingly important commodity in the light of climate change. The Woodland Trust has recently supported an application for the donation of over 100 indigenous trees specifically recommended for this area. The hillsides above Black Brook are riddled with natural springs from the moors which run down through sites LP0026, LP0952, and LP1625, and site LP0177 (a high risk flood area) into Black Brook and to a natural flood plain along side it. Any development on these sites, which act as a natural and essential soak away, would add to the run off of rain and spring water and would exacerbate potential flood damage further down the valley, into West Vale and beyond. To comply with current legislation on

flooding these sites should be removed from the plan. Large open green spaces are required for the mental and physical health and well being of all and Urban sprawl has many negative consequences for residents and the environment. The wooded valley walkway along the side of Black Brook provides a popular area for many of the local residents to enjoy leisure activities (walking, running, cycling etc.) away from the rigors of everyday life and free from traffic and air and noise pollution, yet within walking distance of existing communities. This is an invaluable asset to the community and must be safeguarded from any future development.

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

Duty to Co-operate Reason:

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

Suggested Modifications:

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

Comments:

Additional Evidence Link:

Comment ID **HRU503**

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

Person ID: **1242754**

Name: **Mr Warren Goodall**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

No proper account is taken of the following Flood risk - we are all aware of the devastation caused in Elland in 2015 and 2020. Development on this site would increase the risk of future flooding lower down the valley and into Elland. Preservation of wildlife corridor - this area is home to many species of wildlife deer, foxes, rabbits, squirrels, heron, owls, sparrow hawks and bats are all frequently seen and should be protected. Congestion in West Vale leading to further reduction in air quality and potential health risks for this and future generations. Lack of infrastructure- local schools are already oversubscribed, GP and dental facilities would be unable to accommodate the increase in population. The bus service in this area is infrequent and would not serve an increased population adequately, the lane at the side of this site is not

wide enough for 2 cars to pass which would cause further congestion and for most of the lane there is no footpath for pedestrians so totally unsuitable access to a housing development. There is a public footpath through this and other sites in the development plan which are used by groups and individuals (many from outside the area) enjoying the beauty of open space, and enhancing their physical and mental wellbeing, even if these paths are preserved they would simply become snickets through a housing estate! The Defra 25 year environment plan clearly states we will protect ancient woodlands and grasslands, high risk flood areas and our best agricultural land. Protect our green belt to make this land a breathing space for our urban populations to enjoy and our wildlife to flourish. NPPF explains in paragraph 80 the 5 purposes of green belt land I think this speaks for itself, any development on this site goes totally against those 5 functions and against the Defra 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 **HRU508**

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

Person ID: **956607**

Name: **Mr David Scott**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Please see attached word document.

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

Sound Reason:

Please see attached word document.

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

Duty to Co-operate Reason:

The council gave no information to residents as to why these sites were re-entered into the Local Plan.

Suggested Modifications:

Please see attached word document.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5604897>

Comment ID **HRU510**

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

Person ID: **1239038**

Name: **Mrs Victoria Noble**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I am not sufficiently qualified to comment on this.

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

Sound Reason:

I believe the plan to build hundreds of houses on this site are not sound for a number of reasons. Green belt: The land earmarked for being developed is green belt land. This is supposed to be protected land and there are brown field sites nearby which could instead have been considered for development. There are no exceptional reasons to remove the area's Green belt status and it goes against policy to prevent urban sprawl. Wildlife: This land is the home to many species of animals, many of which are protected. These include bats, deer, foxes, herons, owls, and sparrowhawks. There are also many mature trees which should be protected. There are public footpaths across the site and this is a well-used site where people enjoy spending time in the fresh air. FLOODING: The fields on which these new houses are proposed to be built are a flood plain. The council and unfortunate residents of Park Road in Elland have already witnessed the ramifications of being allowed to build on flood plains on the other side of the canal, which used to provide a natural water run off during bad weather. Since 2015 these fields have flooded completely three times, the latest time being during Storm Ciara in February 2020. The results of building on these vital flood plains would have far-reaching consequences for not only the owners of these future houses, but also the rest of Greetland, West Vale, Elland and as far as Brighouse. Air pollution: The development site is in a valley which traps fumes. The proposed developments added together could bring 1000 or more extra cars, and with them, a massive increase in air pollution to the children of Greetland Academy (especially the youngest children, the infants, whose part of the school is located on Saddleworth Road), as well as the toddlers and pre-schoolers at Sunnybank Pre School. The increase in road usage through Greetland will lead to more idling traffic as they struggle to get through the bottle neck that is West Vale crossroads. This will have a detrimental effect on all sides of the traffic lights, including the ones which are located next to West Vale Primary School as well. Greetland has been grouped in with Elland in this plan, however the majority of the sites are in Greetland and all of the Greetland sites are within one stretch of road. The amount of houses being planned in Greetland is completely disproportionate to the size of the village. 600 new homes in total all being built off Saddleworth Road will increase the population of Greetland by around 30% in an area where the infrastructure is not appropriate. Greetland is a community in its own right but is a village, not a town. The local schools are full, the doctors and dentists' surgeries are not taking on new patients, the road network is pushed to breaking point, the sewer system is at capacity.

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

Duty to Co-operate Reason:

The time frame with which residents can comment has been the absolute minimum, and the way that the online forms have been organised have been made so complicated that it has taken me a long time to understand exactly what I need to do - I think this has been the council's intention all along. There is no exceptional reason to remove this site's green belt status, which goes against government policy.

Suggested Modifications:

The sites earmarked for development need to be altered to use brown field sites rather than green field.

Comments:

Additional Evidence Link:

Comment ID **HRU512**

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?: **No**

Legal Compliance Reason:

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

Sound Reason:

My concerns have been exacerbated by the current and previous large scale flooding on the sites for proposed building. The area is totally unsuitable and I would have thought obtaining insurance for properties would be extremely difficult. Other concerns are that should these properties be built, the effect of pollution in the village and surrounding area would be catastrophic and effect greatly the infants attending the school in the middle of the area. The number of vehicles would increase enormously the traffic problems in the village which currently struggles to cope, worse still at peak times. The infrastructure is not in place to accommodate any more properties; the doctors has currently a vast waiting list, as does the schools. When problems occur on the M62 motorway, traffic diverts through Ripponden and Greetland and this is occurring more and more. This further causes danger to children and pedestrians using the busy roads. There is also the threat to wildlife 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:

Comment ID **HRU526**

Site ref (if applicable):

Person ID: **1242903**

Name: **Mr Martin Moorman**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

This plan in the Greetland area under application numbers LP0952, LP0177 and LP1625 cannot be justified on the grounds of flooding risk, infrastructure concerns including local school and medical practice places and for traffic congestion and climate concerns.

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

Sound Reason:

The housing plan for approximately 60 new houses in the Greetland area is unsound. The areas identified are flood plains and have been proven to flood both in December 2015 and as recently as 9 February 2020. Houses built in this area will flood: FACT

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU531**

Site ref (if applicable):

Person ID: **1242842**

Name: **Mr Simon Matthews**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

The proposals do not fit the spirit, or specific detail of many paragraphs, of the National Planning Policy Framework. However, I feel unqualified to comment on the legality of the document.

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

Sound Reason:

Green Belt The site LP0177 does not meet the requirements of the five tests for use of Green Belt land NPPF (para 134) or show any exceptional circumstances (para 144) where such building could be allowed, but would not maintain openness and instead contribute to urban sprawl (para 133). This is at odds with government's claim to protect the Green Belt ; as reflected in Esther McVey's suggestion that once Green Belt land is built on, it will be gone, probably forever. NPPF para 145 suggests that new building should be focussed on affordable housing for new-entry purchasers, concentrate on sustainable development and use of brownfield sites wherever possible (para 63), and seek to avoid harm to the openness of the Green belt; however, plans already advertised for local building refer only to 4-6 bedroom luxury houses, not starter homes (as less profit?). Current figures for new housing are built on out-of-date predictions on economic growth in the area; further, if development 18/01189/FUL at West Vale goes ahead to build

housing for elderly people, this would free up housing locally so that fewer new houses would be required. Environment and Wildlife NPPF para 174 describes the need to protect enhance biodiversity, habitat and wildlife corridors. This proposed development would do unknown harm to many species ; we regularly see deer, bats, foxes, herons, woodpeckers in the woods by our property, and hear owls most nights, and proposed developments in the area will also lead to loss of mature trees. In addition, the ability to enjoy the environment and walk in green areas is acknowledged to be beneficial to mental & physical health and social well-being (para 8) ; there is a public footpath that runs up the side of this site. Flooding NPPF para 155 states that -“inappropriate development in areas at risk of flooding should be avoided” and that - “development should be safe without increasing the flood risk elsewhere” and also -“to seek to use more sustainable locations where flood risk is likely to be increased” (para 157). When our house was flooded in 2015/16 (on the hill above LP0026), the council engineer told us at that time there is no comprehensive plan or knowledge of the many springs and streams on the land in this area, and a Yorkshire water engineer said the land should not be built on! We already have issues with run-off every time there is a major storm (this week, the storm run off has shattered our waste water pipe and washed away the topsoil, leading to flooding of the bottom of our garden to knee depth) and this water all has to go somewhere. The removal of large areas of grassland reduces the ability of the land so act as a sink for this water as well as leading to an increased risk of flooding to properties and land below us ; part of the the field to be used for LP0026 has visibly suffered from water damage and becoming waterlogged for much of the last four years. Ironically, the junction of Saddleworth Road and Scar Bottom Lane has needed to be dug up for long periods at least three times in this period due to water mains failure leading to our loss of water supply! Yet the council proposes building on this land and other sites sitting on a flood plain - where will the water go? Given that this problem is, and will be exacerbated, by climate change, how does this constitute making provision to mitigate the effects of climate change and increased flood risks? [unable to load video and photographs of the recent flooding] Air Pollution NPPF para 181 talks about improving Air Quality management plans and Clean Air Zones. Given the likely increase in traffic expected due to potentially over 1000 new cars from the development proposed of 600 new houses, it is difficult to see these as being compatible; nitrogen oxides and particulate emissions are likely to increase, especially due to queues at peak traffic times in West Vale, leading to a decline in air quality in the village, including around the local primary school. Infrastructure NPPF 102 requires consideration of avoidance and mitigation of adverse effects of impact of any changes to transport infrastructure. With the building of 600 new houses along Saddleworth Road, the pressure on West Vale junctions is set to increase by over 100%; currently, a journey yesterday to Elland and back in the early afternoon involved over twenty minutes sat in queues for the traffic lights with Stainland Road. Improvements in the wider area, including a railway station at Elland and new M62 junction, will do nothing to alleviate the local situation in West Vale and will actually exacerbate the problem as many of the people relocating here will have to travel to the local cities for work. The inadequate nature of the local public transport means that the vast majority of commuters have to use private cars for journeys; as there are no local amenities within 500m of most of the new developments, this will also increase local journeys into West Vale (as outside the -“edge of centre” radius), putting further pressure on parking in the village. The roads off Saddleworth Road are very narrow and already heavily used ; I have witnessed accidents due to the lack of space, one involving the local small bus and another with a van. With the introduction of construction traffic, travelling around the area will become more difficult ; the proposed mini-roundabout is unlikely to have any effect unless the roads can be widened. Most of Scar Bottom Lane is unadopted and pot-holed, yet still used along with Brian Royd Lane, by some locals to cut through to Rochdale Road - this will be made a lot worse with the developments along Saddleworth Road if built, as drivers seek ways to avoid the congestion in West Vale. Lack of capacity in the local schools and health centre/dentist provision is also of great concern to many of the local residents. There is no evidence of increased provision of school places (para 94), or shops close to the new developments. The new developments would lead to a loss of identity in the current village community, as well as a removal of green areas for social recreation. Ironically, residents would have to take more journeys to reach an area for walking or to enjoy wildlife etc.!

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

Duty to Co-operate Reason:

I feel unqualified to state if the plan complies with the Duty to Co-operate

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU547**

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

Person ID: **1241732**

Name: **Mr. Cory Greidanus**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

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

Sound Reason:

I have already commented on the proposals for this sight, but after the events of this past weekend, I feel I need to add to those comments. I have lived adjacent to one of the sites in question for the past 18 years, and as I mentioned in my previous comment, I have witnessed serious flooding along the Black Brook in 2004, 2007, 2012, 2015 and 2019. Well I'd now like to add 2020 to that list. On Sunday the 10th of February, 2020 this flood plain once again did what it is meant to do: it flooded! The fields soaked up excess water at a time of heavy rainfall, allowing space for the water to flow and be stored in times of flood, protecting land further downstream from potential flooding. Dozens of photos and videos have appeared on social media showing the extent of the flooding, and I'll be attaching some more myself to this comment. Once again areas downstream of this site have been shown to be in danger; the newly

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

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

Duty to Co-operate Reason:

same reasons as above.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU55**

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

Person ID: **955050**

Name: **Mr Thomas Connor**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Government inspector has accused the Council of providing no case for this area as a critical flood plain. Please see attached pictures. The consultation period is the minimum allowable, with little pre warning,

which in my view has given to little time for an adequate response from the people affected.

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

Sound Reason:

Main points of Objection : Loss of large area of Green Belt and Wildlife Corridor Current Chronic Congestion in West Vale, Greetland Impact on current Road Layout of Local Villages Lack of Infrastructure Creation of Urban Sprawl Impact on Air Quality Flooding Risk Sites Recommended having Negative Assessments Failure to plan the "Right Homes in the Right Places" The possible Creation of Homes for "Incomers" Area with no Sites available for Planned Local Employment Additional flooding in areas such as Elland.

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

Duty to Co-operate Reason:

Suggested Modifications:

Demonstration of this site as suitable for Local Plan proposal.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5588842>

Comment ID **HRU553**

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

Person ID: **1242715**

Name: **Mr Mike Riley**

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:

When these areas along Saddleworth Road were included in the original local plan, the local government saw the light and removed these before submitting to central government. Just because some pen pusher in Whitehall has sent it back does not change anything. Mr Jones' comments in support of this plan merely attaches a sales brochure from the national builder, who apparently has control of the land, looking to cash in on their investment. They claim to be creating 3.38 Ha of public open space. This already exists, it makes no reference to the 6.65Ha of green belt it is going to destroy forever. It claims that the development will have significant economic and social benefits. These would be the same wherever the houses were built. It does not make reference to the significant economic costs to build additional schools or medical centres which need to be within recognised catchment areas of the development and where it proposes these could be built. It proposes to access the development of 200 houses via the existing entrance in to Cherry Tree Farm (which in itself is more of a residential community of static caravans than a camp site!) and a second entry into Saddleworth Road at which point the road is presently some 30 foot above the field on the other side of the wall and will need serious excavations affecting natural water

courses.. Developments in Ripponden, a further proposed site in Barkisland and even the creation of three blocks of apartments in Barkisland Mill have all contributed to the increased levels of traffic accessing the M62 east (towards Leeds) at junction 24 on Rochdale Road and Saddleworth Road making West Vale a stationery bottleneck for most of the day. The whole Blackburn Valley is full of natural springs and water courses. On the south side these run from Stainland across Bradley Hall Golf course and into the stream. On the north side from upper Greetland these flow into the brook across the fields in question. The planned excavation and building work will have unknown detrimental impact on these water courses. All the sites along the side of Saddleworth Road are only suitable for grazing sheep and should remain so. Other comments on this have already quoted chapter and verse on the sustainability and keeping green belt sites so I will not repeat these but agree with the findings.

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

Duty to Co-operate Reason:

Suggested Modifications:

Withdraw

Comments:

Additional Evidence Link:

Comment ID **HRU554**

Site ref (if applicable): **IP0177**

Person ID: **1242261** Name: **Mrs Yvonne Lovatt** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

1 FLOOD RISK The land is on a high flood risk area and regularly floods.I live directly opposite Sunny bank annexe/pre school and have seen the land on many occasions resemble a lake.Most recently the boxing day floods and storm Ciara on Sunday the 9th of Feb the land became a river.Saddleworth Road was also gushing with water rushing down it.Where is this water going to go if the land is developed?? These fields are a natural and essential soak off.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 in.Other objections have submitted lots of evidence of the flooded land and the over flowing brook.If this land is developed it will increase flooding in other areas. 2 GREEN BELT The land is green belt which should be protected it is vital to our community.It is used for walking and for people to enjoy the open space.It also helps with our health and well being. It is a designated wildlife corridor and home to deers hedgehogs badgers owls and bats.Some of these species are protected.I also suspect there will be trees on the land that are under a TPO. In July 2019 planning permission was refused for Cherry Tree Farm to extend the caravan site planning application number(No18/01485/COU) because it would be encroaching onto the green belt land. We need to protect the green space not developing it. THE INFRASTRUCTURE Greetland does not have the infrastructure to cope with an extra 600 homes.The local schools are full.local dentists already have long waiting lists,Doctors are full.even for residents it is difficult to get an appointment. Saddleworth Road would not cope with the extra volume of traffic.The road is very dangerous especially at peak times.At school drop off times and pick up times cars park on the pavements,

block peoples drives making it very hazardous. The school is opposite a junction plus bus stops on both sides of the road the congestion around this area is extremely dangerous. 600 more homes would really cause this area to become a death trap. I have often seen traffic queuing as far back as the school to get to West Vale that is causing air pollution which the school children are breathing in. The junction at West Vale is unable to cope with the volume of traffic now let alone if this development goes ahead. Saddleworth road and Rochdale road will become car parks especially when road works are being done which happens on a regular basis. Not to mention when there's an accident on the M62 saddleworth road is used as the escape route. Greetland doesn't even have a regular bus service to ease the traffic situation. Also where are the jobs for these new houses there are no local jobs available This development is not feasible for this area ,

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

Sound Reason:

Please see above comments.

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 **HRU559**

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

Person ID: **1242981**

Name: **Mrs Pamela Watson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Most residents of Greetland are not aware of these proposals. Each resident should be sent a letter detailing the plans. Not everyone is able to access the internet or visit Calderdale offices

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

Sound Reason:

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

are already stretched to the limit Quality of Life - This will cause urban sprawl in Greetland taking away our countryside which is home to wildlife and fauna

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

Duty to Co-operate Reason:

As above. Not every resident of Greetland is aware of these proposals. A letter should be sent to each resident detailing the plans. Not everyone is able to access the internet or visit Calderdale offices

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU575**

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

Person ID: **1242415**

Name: **Mr Christopher Doyle**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Please see comments below

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

Sound Reason:

Objection to proposed developments LP0177 Green Belt Based on NPPF guidelines state councils should retain greenbelt to avoid unrestricted sprawl of large built-up areas and to prevent neighbouring towns merging into one another. Highways Development of sites in Greetland will worsen traffic issues in West Vale. The main problem with traffic in West Vale is the delays at the two sets of traffic lights. Due to queues at the end of Elland Bypass traffic often diverts through Elland into West Vale turning right towards Halifax. With no dedicated right turn lane or filter this causes major delays for Greetland traffic. Traffic will therefore use Saddleworth Road traffic lights and again many will turn right and cause delay and obstruction to traffic wanting to travel to Greetland, Barkisland and Ripponden. Combine this with roadworks, gas mains renewals, drainage works etc and the situation becomes carnage and gridlock. The arrangement causes delays pollution and frustration for all local commuters. Rochdale Road (B6113) and Saddleworth Road (B6114) are main arterial road connecting to Oldham Road (A672) to the west and Huddersfield Road (A629) to the East. These A roads provide access to the M62 corridor and many thousands of commuters that use the main motorway network daily. In the event of motorway closures which occur several times each year the diverted traffic completely gridlocks the secondary road network which is already full. Future developments need to be centred around public transport and rail networks to minimise the reliance upon cars for people travelling to work. When housing is situated in semi-rural areas there remains no choice but to use a car. Unless the issues are directly addressed by the council by infrastructure improvements such as localised road widening, introduction of right turn lanes, filter lights improvements at junction at end of Calderdale way (Elland Bypass) etc no further major housing developments should be planned within the area. Changing traffic light signals and linking to a control

centre will not provide the necessary improvement. Allowing popular drive through burger chains to develop sites without adequate on-site land to safely service customers does not help with congestion at Salterhebble. Stationary traffic on the main road at peak feeding times results. The Site Assessment Report under the section "Potential for Cumulative Impact" simply states "M62 J24" but the complete absence of any reference to the Ainley Top roundabout and current issues at the Motorway Junction and the feeder roads. This shows a complete lack of appreciation of the real local issues. Mitigation that the M62 junctions 20 to 25 are due to be upgraded to smart motorway by 20/21 will not improve issues in West Vale, Salterhebble or Ainley top. The issues at ainley top will only be made worse by introduction of new housing with the inevitable additional commuters to Leeds and other centres of employment. There are queues every day from the main ainley top roundabout trailing back onto the M62 caused by commuters returning home and congestion at ainley top. These trail back down the motorway often for more than a mile. This results in an extremely dangerous motorway with frequent accidents involving cars and wagons an inevitable injuries and fatalities. Further development will only increase the issue. It also results in misery and delays for commuters and pollution. With persistent roadworks for services, maintenance, changes for developments etc, etc. These are never considered and yet they occur on a regular basis. Ainley Top roundabout and all the feeder roads that will take the additional load and this appears to have been totally ignored. Motorway improvements can therefore not be classed as mitigations. Weekdays between the hours of 6.30am to 9.30am, 11.30am to 1.30pm and 3.30pm to 7.00pm, and for long periods throughout both Saturday and Sunday, massive volumes coming from all directions into the Ainley Top roundabout, with long lines of traffic in every direction. Open Space The outcome of this section of the report is stated as -"No Loss/No Impact" Development on this site, combined with plans for development of the field opposite (LP0021) would mean total loss of the current open space! The report also states, "If the site is designated for housing, open space would be required as part of any development", and the council's answer to this has been to remove a tiny section of the field from the housing plans. Housing Services The Site Assessment report states "subject to the Green Belt Review the site "appears suitable for Housing, yet the Green Belt review produced a high score of 4/5 and has still been included for development. The Greenbelt report confirms that development at the site would lead to a -"high potential for urban sprawl" and -"coalescence of towns" In addition, it also states the site -"performs an important role in safeguarding the countryside from encroachment" Environmental Health The area already suffers from considerable traffic noise and the volume of traffic, along with the constant queues of traffic with engines running, mean higher than normal levels of Nitrogen Dioxide already exist. Despite this the plans are to add even more traffic, and some of the new houses could literally be within a few metres from a road that for many hours of every day is subject to standing traffic. How can this possibly make sense in terms of health? Flooding Development on the flood plain is not viable or sustainable. Additional surface run off will inevitably result from tarmac access roads and housing development. Green roofs, permeable driveways, soakaways within gardens may all be put forward as mitigation but there will still be a negative impact upon the runoff into the local streams and watercourses which flow down the valley into the river calder via West Vale. On route there are culverts below roads and rivers flowing through arches below highways that will be affected by the additional water flow and surcharge. Flood plains are already minimising and slowing down the impact upon West Vale. The volumes of water feeding down into West Vale are unprecedented and if any worse flooding of West Vale will occur. Water courses/culverts can easily become blocked and surcharged with debris from upstream. There is already flooding below the railway bridge on Stainland road and within Heath Rugby Club. Calderdale MBC should not require reminding that Elland Bridge and the former Toll bridge at Copley were both washed away in recent years and took years to reconstruct. Which major part of our infrastructure will be washed away next? Brow Bridge, Culverts below Saddleworth Road, River bridges supporting Stainland Road, Elland Bridge main span etc, etc. Development always results in affects downstream.

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

Duty to Co-operate Reason:

Please see comments

Suggested Modifications:

Develop Brownfield sites with better connections to transport links first before destroying green belt.
Proposal is not sustainable environmentally and with respect to infrastructure.

Comments:

Additional Evidence Link:

Comment ID **HRU581**

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

Person ID: **1121012**

Name: **Mr James Sinclair**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

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

Sound Reason:

Please read this section of the Consultation Portal in conjunction with the comments I have made in the other two sections as many comments are relevant to all sections available on the Consultation Portal.

Calderdale Council is basing its estimate of the future need for houses on out-dated information. As we are no longer members of the EU it should revisit those estimates. It is clearly uncertain that the overall requirement for housing will be as great as stated. In reference to this site reference number, LP1625, and sites LP0177, LP0026, and LP0952, there are a number of issues which apply as a result of the scale of proposed development in the Greetland area. There is a grossly disproportionate emphasis that the Plan has upon some communities, particularly Greetland, which are accommodating far in excess of a fair, reasonable and balanced share of development given their relative size. The resulting 'Urban Sprawl' that this plan would create in the Greetland area will have many negative consequences for residents and the environment, such as increased water, air and noise pollution, increased traffic fatalities and congestion, and increased car dependency. The traffic congestion issues, already evident on Saddleworth Road and Stainland Road, do not appear to get any significant recognition in the plan. West Vale is currently at breaking point with the amount of traffic which passes through on a daily basis. West Vale is a vital access route for the valley and surrounding towns and villages and with additional vehicles, a natural bi-product of development, would become dangerously congested. There is no obvious solution to ease the pressures of traffic on West Vale and despite attempts in process of improving the A629 junction, Saddleworth Road and Rochdale Road junctions, it is highly likely that a possible additional 1200 vehicle movements (assuming a 2 car family per household) at peak periods will result in increased congestion and attendant pollution in West vale and surrounding roads. It has also not escaped notice that the proposed modifications to the A629 will result in an additional junction for commuters from West Vale into Halifax to navigate, potentially resulting in even further congestion back into West Vale. WSP Parsons Brinckerhoff Report on Transport Network states that: "Ç This report identifies that traffic congestion at the junction of Stainland Road-Saddleworth Road would increase by approximately 105% "Ç This report also identifies that traffic congestion at the juncture of Stainland Road-Rochdale Road would increase by over 100% The potential increase in car journeys in the area will undoubtedly contribute to increased air pollution, particularly effecting vulnerable young children walking to and attending the local school at the side of Saddleworth Road. The existing infrastructure barely meets the needs of the current population of Greetland so increased capacity of schools, dentists, and GP surgeries would be needed to service such a significant increase in the local population. There appear to be no mitigating factors to compensate for the increase of 600 properties in the area. At an average of 4.4 people per property, the population increase of 2640 represents a 25% increase in the potential number of patients eligible for treatment in the local Medical Centre, a service which struggles to cope today. The development of these sites would be against all five functions of Green Belt and, most decisively, would mean the coalescence of Greetland and West Vale and the deterioration of the identity of both places, thus undermining the Council's Settlement Hierarchy. This area of Greetland has an abundance of wildlife due to the natural and undisturbed environment. The valley is home to an extremely healthy and diverse fauna, including heron, kingfishers, dippers, nut hatches, kestrels, owls, pheasant, woodpecker, bats, fox and deer with trout in the brook itself. Development along the riparian habitat would have a severe impact on a number of species who are reliant upon the Eco system which currently exists here. There are also ecological constraints with regards to Black Brook as it is a UK Biodiversity Action Plan Priority Habitat. In addition, the Woodland Trust has recently supported an application for the donation of over 100 indigenous trees specifically recommended for this area. There are many natural springs on the hillsides above Black Brook which run down through sites LP0026, LP0952, and LP1625, and site LP0177 (a high-risk flood area) is partly situated on a natural flood plain. Any development on these sites, which act as a natural and essential soak away, would add to the run-off of rain and spring water and would exacerbate potential flood damage further down the valley, into West Vale and beyond. The impact of Storms Ciara and Dennis over the week of 9 th -16 th February 2020 should provide a salutary reminder to Council planners of the danger of continuing housing development on flood plains and associated drainage slopes. To comply with current legislation on flooding these sites should be removed from the plan. Large open spaces are needed for the mental and physical health and well being of all. Urban sprawl has many negative consequences for residents and the environment. The wooded valley walkway along the side of Black Brook provides a popular area for many

of the local residents to enjoy leisure activities (walking, running, cycling etc.) away from the rigors of everyday life and free from traffic and air and noise pollution, yet within walking distance of existing communities. This is an invaluable asset to the community and must be safeguarded from any future development.

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

Duty to Co-operate Reason:

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

Suggested Modifications:

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

Comments:

Additional Evidence Link:

Comment ID **HRU585**

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

Person ID: **1128407**

Name: **Mrs Patricia Sinclair**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Please read this section of the Consultation Portal in conjunction with the comments I have made in the other two sections as many comments are relevant to all sections available on the Consultation Portal. Also note that these comments apply equally across applications LP0026, LP0177, LP0952 and LP1625, as taken together they represent a clear and present danger to the health and vitality of the West Vale/Greetland community. The Local Plan does not address the implications of the National Planning Policy Framework, especially, NPPF Para 177 and the associated PPG in the Sustainability of Greenbelt Sites. Site assessments for the 4 proposed development sites in Greetland are overwhelmingly uncertain or negative: LP0026 ; 10 Uncertain Assessments and 1 Negative Assessments. LP0177 ; 9 Uncertain Assessments and 4 Negative Assessments. This site was also refused planning permission in July 2019. LP0952 ; 11 Uncertain Assessments and 2 Negative Assessments LP1625 ; No sustainability assessments! It is inconceivable that given the above, development should be permitted and even more unbelievable that local councillors should support the adoption of the plan! According to the NPPF Para 143 under 'Proposals affecting the Green Belt' it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' Those very special circumstances simply do not exist and all other more appropriate sites should be included in the Plan before Green Belt sites such as this one. There are no justifiable exceptional circumstances for change of use of this area of Greenbelt

land. Although Calderdale Council do recognize some (but by no means all) elements harmful to the Green Belt in their plan, they offer only feeble mitigation against that harm. Calderdale Council need to demonstrate that the Local Plan will enhance those areas where development is proposed and that the development will not negatively affect the existing local communities and the environment in which they live. They have singularly failed to do this. I feel that these plans have not been properly considered and I strongly believe that they will negatively impact upon the environment and the quality of life in the community for years to come.

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

Sound Reason:

Please read this section of the Consultation Portal in conjunction with the comments I have made in the other two sections as many comments are relevant to all sections available on the Consultation Portal. Calderdale Council is basing its estimate of the future need for houses on out-dated information. As we are no longer members of the EU it should revisit those estimates. It is clearly uncertain that the overall requirement for housing will be as great as stated. In reference to this site reference number, LP1625, and sites LP0177, LP0026, and LP0952, there are a number of issues which apply as a result of the scale of proposed development in the Greetland area. There is a grossly disproportionate emphasis that the Plan has upon some communities, particularly Greetland, which are accommodating far in excess of a fair, reasonable and balanced share of development given their relative size. The resulting 'Urban Sprawl' that this plan would create in the Greetland area will have many negative consequences for residents and the environment, such as increased water, air and noise pollution, increased traffic fatalities and congestion, and increased car dependency. The traffic congestion issues, already evident on Saddleworth Road and Stainland Road, do not appear to get any significant recognition in the plan. West Vale is currently at breaking point with the amount of traffic which passes through on a daily basis. West Vale is a vital access route for the valley and surrounding towns and villages and with additional vehicles, a natural bi-product of development, would become dangerously congested. There is no obvious solution to ease the pressures of traffic on West Vale and despite attempts in process of improving the A629 junction, Saddleworth Road and Rochdale Road junctions, it is highly likely that a possible additional 1200 vehicle movements (assuming a 2 car family per household) at peak periods will result in increased congestion and attendant pollution in West vale and surrounding roads. It has also not escaped notice that the proposed modifications to the A629 will result in an additional junction for commuters from West Vale into Halifax to navigate, potentially resulting in even further congestion back into West Vale. WSP Parsons Brinckerhoff Report on Transport Network states that: "£ This report identifies that traffic congestion at the junction of Stainland Road-Saddleworth Road would increase by approximately 105% "£ This report also identifies that traffic congestion at the juncture of Stainland Road-Rochdale Road would increase by over 100% The potential increase in car journeys in the area will undoubtedly contribute to increased air pollution, particularly effecting vulnerable young children walking to and attending the local school at the side of Saddleworth Road. The existing infrastructure barely meets the needs of the current population of Greetland so increased capacity of schools, dentists, and GP surgeries would be needed to service such a significant increase in the local population. There appear to be no mitigating factors to compensate for the increase of 600 properties in the area. At an average of 4.4 people per property, the population increase of 2640 represents a 25% increase in the potential number of patients eligible for treatment in the local Medical Centre, a service which struggles to cope today. The development of thesesites would be against all five functions of Green Belt and, most decisively, would mean the coalescence of Greetland and West Vale and the deterioration of the identity of both places, thus undermining the Council's Settlement Hierarchy. This area of Greetland has an abundance of wildlife due to the natural and undisturbed environment. The valley is home to an extremely healthy and diverse fauna, including heron, kingfishers, dippers, nut hatches, kestrels, owls, pheasant, woodpecker, bats, fox and deer with trout in the brook itself. Development along the riparian habitat would have a severe impact on a number of species who are

reliant upon the Eco system which currently exists here. There are also ecological constraints with regards to Black Brook as it is a UK Biodiversity Action Plan Priority Habitat. In addition, the Woodland Trust has recently supported an application for the donation of over 100 indigenous trees specifically recommended for this area. There are many natural springs on the hillsides above Black Brook which run down through sites LP0026, LP0952, and LP1625, and site LP0177 (a high-risk flood area) is partly situated on a natural flood plain. Any development on these sites, which act as a natural and essential soak away, would add to the run-off of rain and spring water and would exacerbate potential flood damage further down the valley, into West Vale and beyond. The impact of Storms Ciara and Dennis over the week of 9th -16th February 2020 should provide a salutary reminder to Council planners of the danger of continuing housing development on flood plains and associated drainage slopes. To comply with current legislation on flooding these sites should be removed from the plan. Large open spaces are needed for the mental and physical health and well being of all. Urban sprawl has many negative consequences for residents and the environment. The wooded valley walkway along the side of Black Brook provides a popular area for many of the local residents to enjoy leisure activities (walking, running, cycling etc.) away from the rigors of everyday life and free from traffic and air and noise pollution, yet within walking distance of existing communities. This is an invaluable asset to the community and must be safeguarded from any future development.

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

Duty to Co-operate Reason:

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

Suggested Modifications:

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

Comments:

Additional Evidence Link:

Comment ID **HRU598**

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

Person ID: **1243001**

Name: **MR David Farrar**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

See comments below

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

Sound Reason:

I object to the Local Plan Site Ref LP0177, LP0952, LP1625, LP0026 for the following reasons: Loss of highly Sensitive Green Belt Increased Traffic Congestion Increased Air pollution Increased Flooding to sewers and rivers Loss of -“Highly Sensitive Green Belt” NPPF Section 13 Protecting Green Belt Land Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: 1) to check the unrestricted sprawl of large built-up areas (2) to prevent neighbouring towns merging into one another (3) to assist in safeguarding the countryside from encroachment (4) to preserve the setting and special character of historic towns (5) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Calderdale Council, in its own evidence, concludes that this area of Green Belt performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt. Esther McVey's (former Housing Minister up to Nov 2019) written policy on Green Belt land quotes: "protecting the Green Belt goes beyond protection against development" -“My department is working with DEFRA (Department of Environment, Food & Rural Affairs) and Natural England on the once-in-a-generation Environment Bill which will establish a comprehensive legal framework for environmental improvement and make net gains for biodiversity mandatory for new development. Of course one of the most important environmental safeguards we have is the Green Belt. And I want to be clear that our commitment to this is as strong as ever, with any changes only happening in exceptional circumstances ; protecting the Green Belt goes beyond protection against development” Exceptional circumstances in The Government White Paper -“Fixing our Broken Housing Market” Parag 1.39 states that: -“The Government wants to retain the high bar to ensure the Green Belt remains protected, but we also wish to be transparent about what this means in practice so that local communities can hold their councils to account therefore we propose to amend and add to the National Policy to make it clear that: authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including making effective use of suitable brownfield sites and the opportunities offered by state regeneration: Do Calderdale Council have the evidence that they have done this? Brownfield sites have been removed from the plan because developers do not want to develop these sites as their profits are not as high. This is not a good reason for destroying highly sensitive green belt and does not constitute exceptional circumstances. There are brownfield sites within Calderdale that could be developed to provide the necessary housing demand and should be developed first before destroying green belt for ever. Changes to Economic Relationships The Local Plan was drawn up between 2016 and 2018, with amendments made in October 2019. The plan was based on housing requirement to support the economic growth plan. This country has just seen its biggest change in 47 years as we have now left the EU. The housing projection used in the Local Plan must no longer be valid due to the significant change in UK's relationship with the EU. Reduced immigration will lead to a reduction in the amount of new housing required and therefore reduce the need to release Green Belt. It must be reviewed prior to acceptance of the plan as the housing need will be significantly smaller post Brexit. Increased Traffic Congestion Saddleworth Road\Stainland Road Junction. The 4 sites proposed on Saddleworth Road will more than double the number of vehicles coming down Saddleworth Road. There has been chronic congestion at the 2 traffic light junctions in nearby West Vale for a number of years now. This crossroad junction carries traffic from Greetland, Barkisland and Ripponden, traffic to and from Elland and Junction 24 of the M62, and all traffic travelling between Halifax and the villages beyond the Outlane area of Huddersfield and Junction 23 of the M62. This junction is dangerous and congested throughout the day, especially since a Cooperative store was sited in the middle of the Saddleworth Road/Stainland Road traffic light junction about 4 years ago. Vehicles including buses and trucks fight over the space at both junctions in West Vale and often selfishly push their way through when the lights are red, in turn putting other road users and pedestrians at risk of harm. The flow of slow moving vehicles is constant and air pollution here has increased as a consequence. It has been stated that this can be resolved by changing the setting on the traffic lights, but this cannot ease the congestion if additional capacity is not provided on the roads out of the junction towards Elland or Halifax. The multimillion pound works at Salterhebble will only make the

congestion worse in West Vale as it makes the queueing area between Salterhebble mini roundabout and West Vale smaller, therefore the traffic will back up into the West Vale traffic lights area making the situation worse. The local roads are incapable of taking any additional traffic. Calderdale Council are proposing to allow 600 plus properties to be built on Saddleworth Road thus adding to the chronic issues which already exist. Increased Air Pollution The primary goal of the Clean Air Act is, -“to achieve national ambient air quality levels protective of public health and welfare by establishing air quality standards and imposing limitations on air pollutant emissions from both stationary and mobile sources” The doubling of the number of vehicles (due to the proposed housing developments) using and sitting in traffic queues on the lower part of Saddleworth Road will impact negatively on the air quality in the area. There is an infant school and pre school located between 2 of the proposed large housing sites on Saddleworth Road. Traffic around the school is already a major safety issue and the road around the school is a bottleneck twice a day. Increased emissions from the standing traffic will affect the children and families using the school and those living near the school. Air quality standards will be compromised. The centre of West Vale probably has poor air quality already. Let's not add to it for the sake of our health. Clean air is crucial for our health and well being, and Greetland is a community continually trying to create a better and healthier environment for the benefit of everyone. Money has been obtained from the Woodland Trust and a large number of trees have already been planted in the area and more are planned. This is being undertaken in order to maintain good air quality and to help preserve the habitat for the wildlife corridor here. Massive house building in the area will negate these actions. Flooding Immediate Area On the last Local Plan these sites were graded as a Class 1 Severe Risk Flood Area and were removed; in compliance with current legislation they should not have been put back into the amended Local Plan in October 2019. The area to the rear of Woodfield Drive next to the brook, part of the development site LP0177, flooded very badly on Boxing Day 2015 and again 8th/9th February 2020 and again 14th/15th February . Residents have already posted images of the flooding in this Portal for reference. The current planned development in along Saddleworth Road will increase greatly the peak flows and volumes runoff from the fields and therefore the risk of flooding. Developers use Sustainable Urban Drainage techniques to slow this flow down, but the clay soil in this area make this technique unsuitable. The alternative is large storage areas either above or below ground. These techniques will reduce peak flows and slow the flows down but they do not reduced the volume of runoff that will be more than double the greenfield runoff, thus making the flooding to the rivers worse in the immediate vicinity and West Vale. Current policy and legislation on flooding states "due to every increasing wide-scale flooding incidents in the country and the ever increasing threat of climate change new development in a flood area that increases the risk of flooding in the development's community or elsewhere is not permitted". Calderdale Council Planning Department has a duty of care to comply with current policy and legislation on flooding. Housing should not be built on sites such as this. Wider Catchment Issues The Black Brook flows through West Vale and discharges into the river Calder in Elland. In 2015 and 2020 major flooding has occurred on the River Calder at Todmorden, Hebden Bridge, Mytholmroyd, Sowerby Bridge, West Vale, Elland and Brighouse. The proposed development along Saddleworth Road as stated above will double the volume of water into the black brook further increasing the risk of flooding at very sensitive flood site downstream in Elland and Brighouse. If the land is no longer needed for farming, it would be better used to contribute to reducing the wider catchment flooding issues by planting trees which will reduce runoff and also enhance the wildlife corridor. Sewer Flooding The sewers that runs close in the Black Brook and down Saddleworth Road are already overloaded with combined sewer overflows (CSO) that discharge excess flows into the brook at time of rainfall. The proposed developments will more than double the number of houses connected to these sewer systems. These additional foul flows will almost double the flood volumes on the sewers and and nearly double the annual spill volumes from the CSOs which will increase the pollution to the brook. This will have a negative impact on the fish and wildlife in the area. The Environment Agency have a no deterioration policy for CSOs but there are currently no plans to upgrade the sewer system in Greetland and West Vale to negate this impact.

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

Duty to Co-operate Reason:

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

Suggested Modifications:

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

Comments:

Additional Evidence Link:

Comment ID **HRU603**

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

Person ID: **1243009**

Name: **Mr Martin Worsick**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

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

Sound Reason:

Green open spaces are very important to our health and well being and we have chosen to live in a rural area exactly for those reasons. Urban sprawl is in danger of encroaching on our local green spaces and removing precious green belt land and corridors which host a wide variety of flora and fauna. We have seen deer, pheasants, owls, bats, and a wide variety of birds. Black Brook has brown trout and possibly even otters. In Calderdale's own Sustainability Appraisal in 2018 the sites were recognised as being grade 3 agricultural land and as being a valuable commodity for the future especially due to climate change. As mentioned above there is a serious risk of flooding which would only be exacerbated by any housing built on the fields identified in sites LP0026, LP0177, LP1625, and LP0952 which would remove valuable soak away areas. There is a grade 2 listed farm house building yards to the south of this site. Site LP0177 has recently been refused planning permission (5th July 2019). Again looking at the 4 proposed sites

mentioned above, and the high number of proposed houses (600) at the side of Saddleworth Road there would be a massively significant increase in traffic on this road leading to even more issues at the already congested junctions of Saddleworth Road and Stainland Road and Stainland Road and Rochdale Road in West Vale. The early morning and school time traffic queues stack back almost to the school on Saddleworth Road at the moment so additional traffic would undoubtedly increase air and noise pollution particularly in the area around the school where especially vulnerable young children walk to school. Rat runs may also be created between the main arterial routes as drivers seek to avoid the worst congestion. The local infrastructure is already stretched with schools, doctors, and dentists in the area struggling to meet the needs of the local community. This is an area with a high car ownership and public transport in the area is poor and infrequent with only limited services to serve the community.

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

Duty to Co-operate Reason:

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

Suggested Modifications:

This plot should be taken out of the Local Plan.

Comments:

Additional Evidence Link:

Comment ID **HRU608**

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

Person ID: **1242514**

Name: **MRS Christine Beaumont**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I would like to object to the proposed local plan for Greetland. First of all point out that Greetland is in Halifax and not Elland (my address Greetland, Halifax, West Yorkshire NOT Greetland, Elland, Calderdale). I have been a resident in the village of Greetland for over 35 years. Within these years I have seen several housing developments built. First of all the Goldfield Estate. A very large housing development. This was built on an area of green space and took away a play area for children and recreational use for adults. It also took away a natural habitat for wildlife. The 2nd estate to be built was the Bankfield Estate. Again another large estate. Which took away a play and recreational area and also wildlife habitat. One of those being a very large pond fed by local springs where newts, frogs and dragon flies could be found. It was a regular place for families to visit. In addition to these there have been several smaller developments. The developments over the last 35 years has resulted in the village doubling in size. The school, which only had one class per year when my own children attended, now has 2 classes per school year. I understand the capacity of the school is 420 and the school is FULL. Objection Flooding - 2015 & 2020 The Greenbelt land

proposed for building is prone to flooding. In 2015 there was significant flooding to the fields in question. Prior to this date there were defined paths from West Vale, along Black Brook, to Gate Head Lane. After the floods these disappeared. The ground fractured in some of the areas. The water was contained by these fields. As far as I am aware, there wasn't any damage to properties in the surrounding area. However, further down the valley, towards Elland, buildings, a bridge and other properties sustained significant damage. The bridge collapsed. Where is the water to go if the fields are built on? Will the properties in lower Greetland/West Vale be the next area to experience flooding? Are they going to suffer in the same way as those in Hebden Bridge? Since writing this, there has been further significant flooding to the area. On 8th and 9th February 2020 the land on all of the local plans for Greetland was flooded. Several images/videos can be found on the Greetland Pressure Group facebook page. In addition to these areas significant flooding occurred on Stainland Road, the fields off Stainland Road, Elland, Brighouse and the Calder Valley. Stainland Road travels through West Vale (lower Greetland). Infrastructure - Education, Health, Highways. Highways If the building work was allowed to be carried out there would be noise, dust, mud. Constant and increased traffic on both Saddleworth Road and Rochdale Road. Vehicles (trying to avoid building contractors and queues on Saddleworth Road) taking the narrow roads up to Rochdale Road to enable them to take that road into West Vale. The roads in this area cannot cope with any increase in traffic. A journey down to West Vale (on both roads) at peak time in a morning can take up to 25 minutes at the moment. This journey time will increase considerably if the number of dwellings proposed were to be allowed. As a result of standing traffic there would be a significant increase in air pollution. It is obvious even now when you walk down the hill from Greetland to West Vale. Air pollution is particularly bad in West Vale at peak times. This is only going to get worse with the extra vehicles both from the new estates and the building contractors. Saddleworth Road or Rochdale Road have to be taken if you intend to travel in the direction of Halifax or Huddersfield or join the M62. There is no alternative. All roads lead to West Vale and no recalibration of the traffic light timing sequence at the junctions will ease the present congestion or future increased traffic. The routes our children take to walk between their respective schools are the same ones that will attract the increased traffic and resultant air pollution. What effect will this air pollution have on our community's health? The effect this would have on our children (and adults) would be catastrophic. (increase in respiratory problems?) This is an area where, at the moment, you can still leave your car at home and walk. Surely the health of our community should be our priority. Don't take our countryside away. We need it. Our future generations need it! Infrastructure - Schools The Greetland School is sited on Saddleworth Road and School Street (off Rochdale Road). Greetland School is run over 2 sites. Years 1 & 2 at the Sunnybank Annex. The Sunnybank Annex and pre-school, are in the area where one the largest of the proposed dwellings on the local plan are to be built (LP0177 - 200 houses). The construction of this development, and the others higher up Saddleworth Road, will result in increased air pollution, noise, dirt etc which can only have a detrimental effect on everyone's health. The previous developments resulted in the local schools having to significantly increase class sizes and the number of classes. As the schools are at capacity now, how are they expected to accommodate the children of new families to the area? What effect will it have on existing families being able to get their children into their local school? There would be an increase in traffic at school drop off and pick up times. This is already an issue. Any increase in traffic would only serve to put lives at risk. For a child, walking to school is part of growing up. It is a way of socialising, exercising, learning to deal with traffic, gaining independence etc. Let's make it safe. Infrastructure - Health Additional housing in the area would need our local GP surgeries and dental practices to be expanded. Already there is a shortage of doctors and NHS dentists and this has been the case for some time. This is not going to change. These services are a necessity of life and therefore the lack of them cannot be ignored. This week we have seen the closure of 5 surgeries in Calderdale and patients placed with other, existing, GP surgeries. This extra burden on GP'S cannot continue. We will end up losing General Practice Doctors not attracting them to the area. Extract from the Halifax Courier 21.1.2020. "The Sowerby Bridge, Ovenden and Elland, sites currently operated by Virgin Care LLP (Meadow Dale Group Practice) will close and the CCG will register patients with an alternative practice". Children (and adults) need exercise. Need to be outside in the fresh air. Need to socialise outside

of the home. Extract from the minutes taken at the meeting of the Calderdale Health and Wellbeing Board dated 8th August 2019. "There were a number of recent examples of work within the community which had provided benefits for residents of Calderdale. Examples were provided by Officers in regards to 'harnessing the power of communities', one which involved a walk in the hills with young people, who experienced a different kind of engagement to get away from the notion of the same kinds of activity relating to exercise (e.g. gym, swimming etc.), which positively impacted their health as well as their mental health and emotional wellbeing". How can Calderdale, and the Government agencies, propose building on Greenbelt land and removing what they obviously see as a benefit to their communities health, mental health and emotional wellbeing. Extract from News Centre - Latest News from Calderdale Council(<http://news.calderdale.gov.uk/helping-young-children-to-stay-active>) Posted 27.9.2019. Gemma Mann, Children's Health and Wellbeing Lead at Public Health England, said: -"It's really important that all children get the necessary daily physical activity they need to stay healthy, the benefits for children are well evidenced. Moving more helps young children to develop motor skills, improves cognitive development, helps them maintain a healthy weight, enhances bone and muscular development and supports the learning of social skills." Cllr Faisal Shoukat, Calderdale Council's Cabinet Member for Public Health and Cohesion, said: -"We want all children in Calderdale to have the best start in life. An important part of this is to be physically active from an early age". Don't take our countryside away. We need it. Our future generations need it! Ecology I have reviewed the comments made by Mr Mark Jones of David Wilson Homes. Please explain how reducing a 10HA area of naturally occurring greenbelt/wildlife corridor down to 3.38HA of man-made wildlife corridor can produce "an enhanced biodiversity/recreation corridor". Surely, the greenbelt land as it is, currently sustains a greater and more diverse naturally occurring ecological system than any man-made corridor could ever create. I've also noted Mr Jones comments on the expansion of the school. Another building contract for them! Once again, the big contractors, government and local councils, are attempting to take away school playing fields. Consequently the loss of Physical Education facilities and recreational spaces can only result in even more unhealthy children. How does that sit with "The Councils health and anti-obesity campaign?". I would also question whether Mr Mark Jones ever visited the area in compiling his report. I would also refer to the Housing Minister Esther McVey's speech on the updated National Planning Policy Framework: setting out the government's planning policies for England and how they should be applied. (16.10.2019 published 16.1.2020). "Protecting the environment for future generations" "The revised NPPF also takes a long view; recognising the role that smart planning and good design plays to not just protect, but enhance, our environment and tackle climate change. As such, it asks local authorities to seek net gains for biodiversity when granting planning permissions. It encourages the provision of green infrastructure, recognises the important status of Local Wildlife Sites, ancient and veteran trees and woodland and prevents unacceptable development in National Parks and Areas of Outstanding National Beauty. But we know we have to do more. Which is why my department is working with Defra (Department for Environment, Food & Rural Affairs) and Natural England on the once-in-a-generation Environment Bill which will establish a comprehensive legal framework for environmental improvement and make net gains for biodiversity mandatory for new development. Of course, one of the important environmental safeguards we have is the Green Belt. And I want to be clear that our commitment to this is as strong as ever, with any changes only happening in exceptional circumstances - and, even then, development only being able to go ahead with improvements to access and environmental quality in the remaining Green Belt. Protecting the Green Belt goes beyond protection against development" There is no improvement to access or environmental quality in the remaining Greenbelt. By proceeding with the developments proposed for the Greetland area you are removing a substantial amount of our Greenbelt. As such you are failing to comply with the government ministers instructions. Extract from the Independent 5.12.2019 17.08 pm <https://www.independent.co.uk/news/uk/politics/boris-johnson-housing-build-construction-flood-plains-derbyshire-election-a9234456.html> Boris Johnson has thrown housebuilding plans into confusion, by suddenly calling for an end to construction on flood plains. Around 9 per cent of new homes in England are built on land where there is a -"high probability" of flooding "" and a recent investigation found that

10,000 are currently in the pipeline. But, on the campaign trail in flood-hit Derbyshire, the prime minister said: -“We've got to stop building on flood plains. We've got to stop building on areas which are vulnerable to flooding.” And we now turn to Calderdale Authority. The following link is to a survey sent out by Calderdale Council to the local community. The survey was received on Thursday 6th February, 2020, just before the extensive flooding that occurred on 8th and 9th February 2020. This survey refers to the Climate Emergency. <https://www.calderdale.gov.uk/survey/climate-emergency-2020/?id=fmB2n> Extracts from the survey: " Pollution from fossil fuel vehicles causes asthma in our towns, and worsens the health of those with heart or lung problems. Traffic noise is a nuisance for many communities, and fast moving vehicles pose dangers - especially for children. Many people sit down in their car to drive to work and then spend all day sat in an office. This physical inactivity is bad for our health". Land and Biodiversity "Biodiversity is at severe threat from climate change such as a loss of species and habitats. Land use may need to change drastically in the future to meet climate change targets before the damaging effects are irreversible. Going back in history, much of the UK's land mass was covered in trees. There were also huge areas of bog and marsh. People used the trees as a natural resource as a fuel and to build ships. Bogs and marshes were drained for food production. From a climate change perspective Calderdale alongside the rest of the South Pennine landscape was subjected to 200 years of the worst atmospheric pollution the UK has ever seen from past industrial activity. This has decimated the uplands of Calderdale to a carbon source from degraded peatland, with poor fire resilience, declining biodiversity and reacting rapidly to flooding. It is possible to turn this around, restoring the blanket bog to a condition which is a real benefit to all of us. The uplands of Calderdale also have a lower than average tree cover following historic land management practices. People who live in Calderdale today are very used to seeing fields and open spaces, grazing animals and pastures - land which has been designed by and is managed for the benefit of humans. Declining bee populations have become a well understood symbol of the impact of intensive agriculture. Additionally, a whole host of birds, insects and other animal populations have declined and species are at risk of becoming extinct. We could change how we use land to plant more trees, restore upland bog habits and give more space to wildlife. Our landscape would start to act as a carbon sink as plants thrived. Wild spaces could attract tourists and leisure visitors. Our future landscape could look quite different. Are we willing to see changes made?" There would appear to be some discrepancy in what the Prime Minister, Government Ministers and local authorities are saying regarding the protection of our greenbelts, communities and health. Based on what all these departments have said - house building should be stopped! We should be looking after our communities. We should be protecting our "Green and Pleasant Land" .

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

Sound Reason:

See comments above

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

Duty to Co-operate Reason:

See comments above.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU623**

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

Person ID: **1243017**

Name: **Mrs Jowett**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Please refer to the attached document.

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

Sound Reason:

Please refer to the attached document. There are a number of issues with the proposed plan which are also applicable to (LP0026, LP0952, and LP1625) in the Greetland area. In addition, it is important to consider how strongly the local community feels about the proposed development to the highly sensitive greenbelt area. You only have to look at the >600 members of the local pressure group which has received press coverage as well as regional television attention to evidence this. The group are extensively lobbying to demonstrate how opposed the local community are to the proposal which looks to have a devastating impact on the local area.

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

Duty to Co-operate Reason:

Please refer to the attached document.

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5606077>

Comment ID **HRU625**

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

Person ID: **1243019**

Name: **Mrs Sally Farrar**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

See Comments Below.

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

Sound Reason:

OBJECTIONS TO SITES LP0026, LP0177, LP0952, LP1625 SITES IN GREETLAND The revision of Calderdale's local plan now includes a massive number of houses across 4 sites in Greetland, within a 0.8mile stretch of

a busy B road. All of which is Green Belt. I just don't get it? How can any councillor, cabinet member, planning officer or local government officer even consider the destruction of green belt and open spaces in this area. This is not sustainable and will destroy this area for good, The impact of this for our nature and for our community will be catastrophic. Greetland is a small, historic village on a hillside, surrounded by playing fields, open grazing land and moorland at the top, and by open grazing fields, woodlands, a small river and a long existing wildlife corridor in the valley bottom. The hillside is criss- crossed with ancient public footpaths, and an old, well worn public footpath runs through our wildlife corridor in the valley bottom, travelling the whole length of the proposed local plan site. Green and open spaces around us keep us sane and healthy. We love living here and we use our open green spaces each and every day for fresh air, for walking and exercise, and to engage with the natural environment which is on our doorstep. Mass housing development across these sites will have adverse effects immediately and for future generations. The natural habitats of the wild deer, foxes, bats, owls, herons, field mice and squirrels will be destroyed or changed forever due to noise and light pollution, general disturbance, and by upsetting the natural balance of these areas. Our wildlife will disappear and our youngsters will not experience the sounds of the owls hooting in the night nor see the bats flying about at dusk. One day they will just have to research these things on the internet. How sad is that? Without green and open areas in our community, people will have little option but to jump into their cars and drive somewhere else in order to enjoy natural open spaces and learn about nature and wildlife. Car fumes then causing further damage to the environment. That does not make any sense nor it is sustainable. Changing economy following Brexit The Local Plan was drawn up between 2016 and 2018, with amendments made in October 2019. The plan was based on housing requirement to support the economic growth plan. This country has just seen its biggest change in 47 year as we have now left the EU. The Local plan is now out of date and should be reviewed as housing need will be significantly smaller post Brexit. Reduced immigration will lead to a reduction in the amount of new housing required and therefore reduce the need to release Green Belt. A few small businesses and light industries exist in this area but there are no large employers locally and there are no new sites identified for planned local employment. This will mean that people moving into Greetland will have to travel out of the area for job opportunities, Loss of green belt and wildlife corridor According to the Local Plan, all of this land is classified as -“highly sensitive green belt” We need to protect it not lose it. NPPF Section 13 Protecting Green Belt Land Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: 1) to check the unrestricted sprawl of large built-up areas (2) to prevent neighbouring towns merging into one another (3) to assist in safeguarding the countryside from encroachment (4) to preserve the setting and special character of historic towns (5) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Calderdale Council, in its own evidence, concludes that this area of Green Belt performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt but, most decisively, would see the coalescence of Greetland and West Vale and the deterioration of the identity of both places undermining the Council's Settlement Hierarchy. Notwithstanding this, extreme number of housing proposed in and around the site is undeliverable during a single plan period in plan-making terms and unsustainable in infrastructure terms in relation to the capacity of existing highways, schools and local services. Esther McVey's (former Housing Minister up to Nov 2019) written policy on Green Belt land quotes:: "protecting the Green Belt goes beyond protection against development" “ My department is working with DEFRA (Department of Environment, Food & Rural Affairs) and Natural England on the once-in-a-generation Environment Bill which will establish a comprehensive legal framework for environmental improvement and make net gains for biodiversity mandatory for new development. Of course one of the most important environmental safeguards we have is the Green Belt. And I want to be clear that our commitment to this is as strong as ever, with any changes only happening in exceptional circumstances ; protecting the Green Belt goes beyond protection against development” Exceptional circumstances in The Government White Paper -“Fixing our Broken Housing Market” Paragraph 1.39 states that: -“The Government wants to retain the high bar to ensure the Green Belt remains protected, but we also wish to be transparent about what this means in practice so that local

communities can hold their councils to account therefore we propose to amend and add to the National Policy to make it clear that: authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including making effective use of suitable brownfield sites and the opportunities offered by state regeneration : Do Calderdale Council have the evidence that they have done this? CPRE also state "The development of brown fields sites should be a priority; there are more than enough brown field sites to fulfil the requirement without having to encroach onto Green Belt". There are plenty of brownfield sites in Calderdale that would enhance the area by development and these are the sites Calderdale Council Planning Department should be targetting, thus complying with the current legislation and Central Government policy. Calderdale Council Planning Dept has stated several times that developers are not interested in brownfield sites . This is against Government Policy and does not constitute exceptional circumstances . Accordingly, this site in the existing Green Belt should be removed from the Plan as the exceptional circumstances for its release do not exist. Increased Traffic and congestion on Saddleworth Road, particularly at the traffic lights junction with Stainland Road There has been chronic congestion at the 2 traffic light junctions in nearby West Vale for a number of years now. This crossroad junction carries traffic from Greetland, Barkisland and Ripponden, traffic to and from Elland and Junction 24 of the M62, and all traffic travelling between Halifax and the villages beyond the Outlane area of Huddersfield and Junction 23 of the M62. This junction is dangerous and congested throughout the day, especially since a Cooperative store was sited in the middle of the Saddleworth Road/Stainland Road traffic light junction about 4 years ago. Vehicles including buses and trucks fight over the space at both junctions in West Vale and often selfishly push their way through when the lights are red, in turn putting other road users and pedestrians at risk of harm. The flow of slow moving vehicles is constant and air pollution here has increased as a consequence. The local roads are incapable of taking any additional traffic. Calderdale Council are proposing to allow 600 plus properties to be built on Saddleworth Road thus adding to the chronic issues which already exist. The WSP Brinkerhoff Report of May2017 has indicated that traffic will increase by over 107% if the proposed housing developments were to go ahead. Calderdale have suggested that one solution here will be to alter the traffic lights, presumably to allow more traffic off Saddleworth Road, but this does not make any sense as the all of the other traffic using the junction will back up further. This is a ridiculous -"solution" to the problem and is not feasible nor sustainable Calderdale Council plan to manage traffic in the area by creating a new junction on the A629 for traffic travelling between the Elland bypass and Sowerby Bridge. Additional traffic lights here will only cause the traffic coming from West Vale to back up, especially as there is a low railway bridge for high sided vehicles to negotiate. This is not a viable nor sustainable solution. Increased air pollution What about Clean Air for all ? The primary goal of the Clean Air Act is, I quote -"to achieve national ambient air quality levels protective of public health and welfare by establishing air quality standards and imposing limitations on air pollutant emissions from both stationary and mobile sources" A huge increase to the number of vehicles (due to the proposed housing developments) using and sitting in traffic queues on the lower part of Saddleworth Road will impact negatively on the air quality in the area. There is an infant school and pre school located between 2 of the proposed large housing sites on Saddleworth Road. Traffic around the school is already a major safety issue and the road around the school is a bottleneck twice a day. Increased emissions from the standing traffic will affect the children and families using the school and those living near the school . Air quality standards will be compromised. The centre of West Vale probably has poor air quality already . Let's not add to it for the sake of our health. Calderdale Local Authority is already in the top quarter of deprived authorities so the quality of our living space is crucial. We all need to realise the cost of air pollution. Traffic is the biggest air pollutant. Poor air quality where we live impacts on health and care costs, due to increasing incidents of disease, lung problems and cancers. Clean air is crucial for our health and well-being, and Greetland is a community continually trying to create a better and healthier environment for the benefit of everyone. Money has been obtained from the Woodland Trust for a large number of trees to be planted in the area. This is being undertaken in order to maintain good air quality and to help preserve the habitat for the wildlife corridor here. Massive house building in the area will

negate these actions. Flooding The green belt sites on Saddleworth Road proposed for housing development are flood plains and actually flood when rainfall is particularly high. These sites flooded very badly on Boxing Day 2015 and again as recently as 8 th and 9 th February 2020 and this weekend 15 th February 2020. This has been particularly dreadful for properties situated below Saddleworth Road. Residents have already posted images of the flooding in this Portal for reference. The Black Brook (our small river) collects all of the run off from the hills and fields the length of the Blackburne Valley. Over the years, the path of the Black Brook has altered as the heavy volume of water gouges out new routes for itself downhill in the valley bottom. The fields here are a natural and essential soak off and any building on this land would further increase the flooding in immediate area, and of land, properties and businesses downstream of the Black Brook. Current policy and legislation on flooding states "due to every increasing wide-scale flooding incidents in the country and the ever increasing threat of climate change new development in a flood area that increases the risk of flooding in the development's community or elsewhere is not permitted". Calderdale Council Planning Department has a duty of care to comply with current policy and legislation on flooding. Housing should not be built on sites such as this. On the last Local Plan these sites were graded as a Class 1 Severe Risk Flood Area (LP0177) and were removed; in compliance with current legislation they should not have been put back into the amended Local Plan in October 2019. Flooding in the valley below Saddleworth Road contributes to flooding in the Calder Valley. The Black Brook flows through West Vale and discharges into the river Calder in Elland. In 2015 and sadly ongoing this week, major flooding has occurred on the River Calder at Todmorden, Hebden Bridge, Mytholmroyd, Sowerby Bridge, West Vale, Elland and Brighouse. The huge number of housing units proposed for Greetland will increase greatly the peak flows and volumes of runoff from the area. Developers use Sustainable Urban Drainage techniques to slow this flow down, but the clay soil in this area make this technique unsuitable. The alternative is large storage areas either above or below ground. These techniques will reduce peak flows and slow down the flows but they do not reduced the volume of runoff which will be more than doubled, and in turn contribute to flooding in West Vale, Elland and Brighouse. Severe flooding continues to be disastrous for local businesses, both small and large, destroys peoples lives and impacts negatively on the local economy. Sewer Flooding The sewers that runs close in the Black Brook and down Saddleworth Road are already overloaded with combined sewer overflows (CSO) that discharge into the brook. The proposed housing will more than double the number of houses connected to these sewer systems. The se additional foul flows will almost double the flood volumes and significantly increase the number of spills and volumes from the CSOs which will increase the pollution to the brook. This will have a negative impact on the fish and wildlife in the area. The Environment Agency have a no deterioration policy for CSOs but there are currently no plans to upgrade the sewer system in Greetland and West Vale to negate this impact. Lack of infrastructure Saddleworth Road is a very busy B road carrying a great deal of traffic up and down the valley, including many heavy stone trucks from the quarries and heavy trucks from Sonoco, the nearby recycling plant, There has been one fatality on this stretch of road in the past 3 years. Allowing large scale house building on Saddleworth Road will be dangerous and cause huge problems not only on this road itself but for the adjoining narrow roads and areas. Calderdale Council do not have any plans in place to improve safety or traffic congestion on Saddleworth Road. They propose that long standing traffic problems in West Vale will improve following the creation of a new junction on the A629 towards Halifax, but I do not see how this can possibly alleviate the problems in the immediate locality of West Vale/Saddleworth Road. A planned station at Elland (no-one seems to know when this is meant to happen) will not alleviate any of this congestion either, as more housing in Greetland will mean more cars travelling through West Vale junction to access the station!. Traffic from the wider area will also have to come through West Vale to access any station. Public transport links remain poor on Saddleworth Road and have not altered in years. There is one bus an hour into Halifax or Elland for shopping and other services and the nearest train station is a car or taxi journey away. Apparently at a the Local Plan Meeting it was stated: "We will ensure that there are bus stops near any new developments" I do not see how this will help at all as we do have bus stops already but not much of a bus service! Local primary and senior schools are full. With a proposed 600 plus new houses here, another 200 school place will likely be

needed locally. Local GP practices are already under strain. Further strain on local hospitals Local Dentist has a waiting list of 600 for NHS places.

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

Duty to Co-operate Reason:

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

Suggested Modifications:

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

Comments:

Additional Evidence Link:

Comment ID **HRU643** Site ref (if applicable):

Person ID: **1239036** Name: **Mrs Sarah Williams** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

No - Environmental and social issues not taken into consideration (see 'Sound')

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

Sound Reason:

Flooding - The area is of high flood risk, it is flooded right now. The brook and trees are a natural defence to the running water down the valley. Where will the water go and what damage will it cause to the new and existing housing? Drains and sewers are often burst and overflowing. Building on this land will make the problem worse, adding to the irreversible damage and costing thousands of pounds for home owners. Wildlife - This is a well-loved wildlife corridor that residents use daily. We should be protecting these areas and the wildlife included. On our route to school my children and I have seen deer, herons, pheasants as well as the black sheep in the field. The area is used by dog walkers, parents walking their children to school and we have a local walking group. This is what I, and many residents, enjoy about living in the area and do not want to lose. This area is vital to our health and wellbeing and should be protected at all costs. Traffic and Air Pollution - The traffic from Greetland into West Vale is already awful, it can take up to 20

minutes to get from school to the lights at the bottom of Saddleworth Road. I cannot imagine the effect on traffic, not to mention infrastructure, adding a further 600 households will cause. The smaller roads, such as Sunnybank and Bryan Royd, are very narrow with cars parked both sides and are already used as 'through' roads, often meaning it is dangerous with children crossing and cars trying to pass. The additional traffic will also add to the existing traffic pollution, the cars, trucks, farm machinery and buses queue up Saddleworth Road, next to the pre-school and school gates, exhausting toxic fumes for our children to breathe.

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

Duty to Co-operate Reason:

You make it extremely difficult and complex to comment on these plans, the search function is useless - it is like the plans are hidden to make it too difficult for people to comment, so they don't bother. I have had several system problems with passwords and the website being down. It is also misleading to list these plans under Elland, when it is Greetland. I do not feel qualified to answer the questions you ask regarding legal compliance and duty to cooperate and I feel this puts many people off commenting in the first place. However, the council have a duty of care to take into consideration environmental issues such as flooding, wildlife/Greenbelt preservation, air pollution and climate change.

Suggested Modifications:

None

Comments:

Additional Evidence Link:

Comment ID **HRU648**

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

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:

Flooding Risk 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 and whilst I understand Calder Council is building additional flood defences throughout the valley, there is no consideration for the removal of flood plains. Future development of the site would itself be under serious threat of severe and repeated flooding Loss of large area of Green Belt and Wildlife Corridor The effect on local wildlife and green belt is very important to me, 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 of Infrastructure 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.

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 **HRU652**

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

Person ID: **1243064** Name: **Mr Martin Cleminson** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

I believe the plan to build hundreds of houses on this site are not sound for a number of reasons. Green belt: The land earmarked for being developed is green belt land. This is supposed to be protected land. There are brown field sites nearby such as the recently demolished mills at West Vale which should be considered instead for development. There are no exceptional reasons to remove the area's Green belt status and it goes against policy to prevent urban sprawl. Wildlife: This land is the home to many species of animals, many of which are protected. These include bats, deer, foxes, herons, owls, and sparrowhawks. There are also many mature trees which should be protected. There are public footpaths across the site and this is a well-used site where people enjoy spending time in the fresh air. Flooding: Areas of the fields on which these new houses are proposed, are part of a flood plain. Since 2015 these fields have flooded

completely three times, the latest time being during Storm Ciara in February 2020. The existing volume of water currently causes flooding further downstream, including west Vale Cricket Club, the Bowling Green, and adjacent allotments. The overflowing Black Beck adds to the flooding of Heath Rugby Club and garden centre on Stainland Road. Any additional development will cause further fast flowing run-off from roofs, roads etc., and increase the flooding further, having far-reaching consequences for not only the owners of these future houses, but also the rest of Greetland, West Vale, Elland and as far as Brighouse Air pollution: The development site is in a valley which traps fumes. The proposed developments added together could bring 1000 or more extra cars, and with them, a massive increase in air pollution to the children of Greetland Academy (especially the youngest children, the infants, whose part of the school is located on Saddleworth Road), as well as the toddlers and pre-schoolers at Sunnybank Pre School. Traffic Congestion The existing road network in West Vale cannot cope with the current traffic at rush hour. Traffic regularly backs up significantly on both Saddleworth Road and Stainland Road. The increase in cars and road usage through Greetland will lead to more traffic jams as they struggle to get through the bottle neck. This will have a detrimental effect on all sides of the traffic lights, including the ones which are located next to West Vale Primary School as well. Infrastructure. The amount of houses being planned in Greetland is completely disproportionate to the size of the village. 600 new homes in total all being built off Saddleworth Road will increase the population of Greetland by around 30% in an area where the infrastructure is not appropriate. Greetland is a community in its own right but is a village, not a town. The local schools are full, the doctors and dentists' surgeries are not taking on new patients, the road network is pushed to breaking point, the sewer system is at capacity.

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

Duty to Co-operate Reason:

Suggested Modifications:

Sites with suitable infrastructure or brown field sites should be considered.

Comments:

Additional Evidence Link:

Comment ID **HRU669**

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

Person ID: **1118926**

Name: **Mrs Denise Walker**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

Concerns and objections for the above plan . This is a huge site that is -“the land drain and soak away -“ for the water coming off Greetland hillside . Access roads , driveways, footpaths , patios etc will not absorb the run off . The prospect of more flooding is obvious .Downstream of the brook will suffer greatly. The loss of green belt should not be allowed on such a huge scale . Semi rural areas like ours need to protect what

little we have left ... The number of cars associated with this development will cause traffic , noise and pollution problems for the whole 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 **HRU680**

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

Person ID: **955884**

Name: **Mrs Dinah Boylan**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

We are not in Elland, we are Greetland, a village in it's own right. It is misleading to say we are in Elland. There has to be justifiable reasons and exceptional circumstances to build in green belt, none have been proved, but plenty of justifiable reasons why we shouldn't. Pg 26 of the local plan vision- this development completely opposes what you aim to do Site assessment report says there is no significant detrimental effect that cannot be mitigated against - there are so many valid points which have been put forward to show there will be a severe detrimental effect to local inhabitants, particularly the children, to the wildlife of which there is plenty, to the infrastructure, to the extra traffic- approximately another 400 cars- most houses have 2 cars now. The air pollution which comes with the addition traffic, and most important the flooding which will effect many more than the inhabitants of Greetland

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

Sound Reason:

When can it be sound to build on an area which floods? The grassland is full of natural springs and takes the run off from the estates on Saddleworth Road which then joins Black Brook. I have walked this area very regularly for over 40years and expect to see flooding of varying degrees. There will be additional water from housing developments in the area. This water makes its way to Elland along with the water from the Calder Valley. Mytholmroyd will hopefully have flood barriers in place soon which means there will be more water in the Calder. Elland and Brighouse will have to suffer the consequences, the water will have to spill onto some flood plain somewhere. The increase of traffic causes problems in West Vale. With the recent roadworks I have seen cars trying to avoid the traffic light and use the bridleway by Bradley Farm through to Sia Fibril, this will only increase. The pollution will effect all our health, but predominately the younger generation who we should be protecting, not putting further strain on the NHS. The children at Sunnybank school are sited below road level and as such will be breathing in toxic fumes whilst they are in the protected constraints of school. We have a wonderful variety of wildlife, trout in the beck, Kingfisher, Dippers, Herons, Bats, Fox, deer, Jays, squirrels, rodents and many more. This will all be lost. DEFRA has a 25 year plan to develop a nature recovery network yet Calderdale seem determined to

eradicate it.

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

Duty to Co-operate Reason:

Calderdale has not co-operated with local residents. They also make it difficult to object. They are not co-operating with DEFRA's 25 year plan, nor NPPF, not protecting our children, our habitat, not helping to clean air and decrease pollution. They are causing urban sprawl, losing Greetland's identity, not protecting green belt, all this has a negative mental impact. We need our countryside to stay sane

Suggested Modifications:

There can be only one modification - to remove this from the local plan

Comments:

Additional Evidence Link:

Comment ID **HRU688**

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

Person ID: **1241652**

Name: **R Graham Maslen**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Calderdale's Review of the Green Belt in 2017 showed that this plot (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; Mark Jones, in his comments on the Draft 2017 Local Plan, representing David Wilson Homes, suggested that the development of 200 houses on this site would not result in unrestricted urban sprawl but rather it would limit the future growth of Greetland. What specious claptrap. If you build a housing estate at the edge of a built up area but you include a boundary line of trees around, he asserts, it is now not urban sprawl but a barrier to future development. George Orwell would be astonished at such an outrageous redefinition of urban sprawl. A housing estate with a few trees is still a housing estate and constitutes urban sprawl. It is replacing pasture land and woodland around a river, which is rightly and correctly assessed by the Council to be performing well as Green Belt. There was also a suggestion by the same representative of David Wilson Homes in the consultation in 2017 on the Draft Local Plan, that, 'the development would not visually close this gap, a clear open gap (with intervening tree cover) exists and the proposed development of the site would offer additional screening and would therefore serve to increase the perception of the gap between the settlements'. His tendentious assertion is that building 200 houses screened by a few trees would create the perception of an increased gap between Greetland and Holywell Green. I suppose if I climbed up one of those trees and squinted my eyes on a typically grey November day and raised my eyes towards Holywell Green the gap might be perceived to be a bit bigger if I looked above the rooftops of all those houses! This

representative also re-names this area of pasture land around a river, 'transitional urban fringe land' and not 'open countryside' because of its proximity to the built up area of Greetland. The point of designating areas of land next to built up areas as Green Belt is to protect them from being turned into a built up area. The logic of this arcane reasoning is that successively over time all land would be built on because at some point it will be contiguous to a built up area and then automatically become 'transitional urban fringe land' and thus available for development. As a local resident I walked through this plot along the footpath yesterday and my objective assessment was that it was an area of pasture land around a river. Perhaps if I were a representative of a housing construction company seeking new sites it might be magically transformed into 'transitional urban fringe land' which could only be improved by building lots of houses on it and thus restrict urban sprawl and maintain the integrity of Greetland as a settlement. This parcel also meets five of the six objectives for the Green Belt identified by the Local Authority: -to provide opportunities for access to the open countryside for the urban population; -to provide opportunities for outdoor sport and outdoor recreation near urban areas; -to retain attractive landscapes, and enhance landscapes, near to where people live; -to improve damaged and derelict land around towns; -to secure nature conservation interest; and, -to retain land in agricultural, forestry and related uses. Given that this parcel performs well as part of Calderdale's and Greetland's Green Belt the Local Authority has not specified the exceptional circumstances that must be present to develop green belt land. Whilst the Local Authority states it has adopted a sequential approach to identifying potential sites for housing development. It is not exactly specified what the sequence was but the following is included in 'Addendum for Exceptional Circumstances Technical Paper' 2019. Regeneration and brownfield sites near town centres Sites which can be delivered quickly Sites with a creative mixed use New allocations in sustainable locations close to existing or planned transport investments and established transport corridors It is not clear that all the brownfield sites were considered before sites which could be delivered quickly or whether these conditions were considered together. This site would clearly come under the last category. The Local Authority has not demonstrated that it has examined all other options. We need a list of all the potential brownfield sites available in Calderdale and whether they are being developed and if not why not? Anyone walking around Halifax would be aware of the number of disused and derelict sites that have remained undeveloped for years. Why are Green Belt sites even being considered for development when these sites remain vacant? We, as residents in this Local Authority, deserve transparency in relation to this issue. Building 200 houses on this land would extend the built-up area of Greetland and undermine one of the fundamental objectives of Green Belt designation. The development of this site would further contribute to the extension of Greetland towards Holywell Green compromising the integrity of Greetland as a community. Flooding This is sloping land with several smaller streams running into Black Brook from both sides. In its site assessment the Council conclude that, 'The site is suitable for the development after FRA of the water course and evaluation of existing drainage network and suitability of SuDS including analysis of historical surface water flooding'. Climate change inevitably means that the weather systems that brought flooding in 2015 and 2020 will become more frequent and more severe. Historical analysis will only provide a partial account of likely events in the future. Calderdale Council took the bold step in January 2019 of declaring a 'climate emergency'. This was a laudable development but it must now translate that declaration into practical steps to achieve its Vision 2024. It is difficult to understand how building 200 houses on this site, supports this statement by the Council, 'Protecting the local environment supports the Vision's key themes of distinctiveness and resilience, by helping to ensure that Calderdale remains an outstanding place for generations to come'. Clearly the Council's definition of 'local environment' excludes Green Belt land performing well against the objectives if a construction company wants to build houses on it. The loss of this land will promote run-off into Black Brook and increase flooding frequency and extent despite mitigating measures undertaken by the developer. 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'. Ecology The site assessment recommends that the Black Brook and a 10m buffer alongside should not be developed as this is part of a designated Wildlife Habitat Network. The Pheasants, Canada Geese, Herons, Kingfisher, Green Woodpeckers, Jays,

Barn Owls, Bats, Squirrels, Roe Deer, Kestrels, Hedgehogs, Foxes, Field Mice, Voles, Shrews, Moles, Sparrowhawk, Parakeets in summer. Marshland and Great Crested Newts will now be confined to a narrow corridor along the river. This will amount to no more than 10% of this site. This is not mitigation it represents a significant loss of habitat. Highways The comments on the site assessment about highways relate to strategic motorway developments. This is at odds with the Council's own analysis of future work and commuting patterns. In its assumptions it does not envisage any increase in commuting in/out of Calderdale and the increased employment forecast is to meet the expected need within the Local Authority area. The Council should not be concerned about the addition of another junction on the M62 but rather it should prevent adding to the traffic bottleneck at West Vale by advocating this development of 200 houses. In the Site Assessment it states, 'Assessment in any planning application would need to assess the impact on the local road network'. This is particularly important with regard to West Vale. The proposals for the West Vale junctions currently in the Infrastructure Delivery Plan are wholly inadequate. Environmental Health The Site Report concedes that this development will impact on air quality and noise pollution. It states that mitigation will be required but does not specify what form that mitigation would take. Building houses near to an industrial site is problematic for future residents with regard to noise and air pollution. In turn the addition of 200 houses will contribute to a significant increase in noise and a deterioration in air quality. Infrastructure The NPPF recommends that developments should have regard to the supply of school places and services. There is currently no provision in the Infrastructure Delivery Plan for the expansion of primary school places in Greetland and provision for only an additional 75 secondary places. There are no plans for additional surgeries

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

Duty to Co-operate Reason:

Suggested Modifications:

This site should remain as Green Belt.

Comments:

Additional Evidence Link:

Comment ID **HRU716**

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

Person ID: **1242716**

Name: **Mrs Elyse Margetson**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I am not qualified to assess this. However, I would comment that the process to object is neither easy or straight forward and the online forms and documents presented are complicated, lack clarity and make it challenging and off-putting to object. Although I am a technologically literate person I have found it onerous to find my way around the information. Additionally, I feel that insufficient time has been allowed for full consideration of all the documents which need to be read to understand this issue fully and for objections to be made. I also have significant concerns about the way in which the Local Plan has developed and cannot be sure that it is free from political bias. Having read the report ' CC37 - Potential Sites - considered and rejected, November 2019 - Report on options rejected ' I see that the main

difference with those sites rejected and the sites LP0026, LP0177, LP0952 and LP1625 which were accepted were that they didn't have a developer on board! This makes me very concerned that the desire to develop land quickly, because there is a ' developer on board ', may have been a key factor as to whether a particular location was included in the Local Plan, especially as I note that in the Consultation comments there are already a set of plans from Barratt Homes for site LP0177. The interest and profits of prospective developers should not be a reason at all (never mind a key reason) for a site being included or excluded from the plan. The other reasons cited for excluding sites such as Green Belt, Access, Wildlife issues, Flooding constraints all apply to sites LP0026, LP0177, LP0952 and LP1625 and therefore these sites should equally be rejected from the Local plan. Importantly, I would also comment that plans LP0026 (The Gate Farm), LP0177 (Land adjacent Ellistones Place), LP0952 (Land at New Gate Farm) and LP1625 (Land to the west of Silverdale Terrace) should not be considered as separate proposals. They are so interrelated (sited within a small 1 km area along Saddleworth Road) that they can only be assessed fairly if considered as a whole. By splitting them out as separate plans the full picture is being concealed. My comments therefore are relevant to each of the plans LP0026, LP0177, LP0952 and LP1625 and should be considered as equal objections to all four sites.

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

Sound Reason:

As a non-specialist lay person I can only comment from a personal, common sense and non-political perspective as someone who has lived within the Greetland community for a number of years and who has attempted to read the various policy documents attached to the local plan. My main points of objection are as follows: Loss of Greenbelt land Increased risk of flooding Loss of Wildlife Habitats Lack of Infrastructure Traffic congestion, air pollution and noise pollution

1. Loss of Greenbelt Land Once it's gone, it's gone! We cannot bring back Greenbelt Land once it has been built upon. Land that is precious to this community and to the wider community - from a visual, physical and emotional perspective - to both humans and wild animals. Para 98 of the National Planning Policy Framework (NPPF) states that ' Planning Policies and decisions should protect and enhance public rights of way and access '. There are public footpaths through all the sites in the proposed development plans which are used by groups and individuals from both within the local community and from further afield. I personally regularly use these public footpaths to dog walk. It is important to have this safe space to exercise, particularly as it feels unsafe to walk along the main Saddleworth Road with the heavy lorries hurtling down, and with many of the side roads having no or insufficient pavements. I am also aware that many Duke of Edinburgh groups use these public rights of way as part of their expedition practices (both of my daughters have taken part in such walks). To take away these footpaths is to deny our young people the opportunity to enjoy the countryside and open air whilst undertaking physical activity in a natural and safe environment, away from traffic, crime and pollution. To allow these developments would be to create urban sprawl, gradually encroaching on precious greenbelt Land that our community relies on for our wellbeing. The NPPF at a para 133 states that -“ The Government attaches great importance to Green Belts ”and at para 136 that - “Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified” At para 144 it further states -“ local planning authorities should ensure that substantial weight is given to any harm to the green belt”and at para 145 -“ a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt ” Building on these sites is contradictory to all of these statements. I do not see any exceptional circumstances evidenced or justified in these proposals to allow building on this Greenbelt land. I note that comments, from what appears to be the Council, have been made on each individual plan to the effect that ' The site is currently designated as greenbelt but also performs the function of a natural/semi-natural open space. An assessment of open space in the area shows that there are sufficient alternative natural/semi-natural areas within the catchment of this site to meet the adopted standards ' - I do not agree with this statement. When each of the 4 sites are reviewed together a large and disproportionate area of open space would be lost to this

small community. At para 137 the NPPF states ' Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. '. I do not agree that the authority in this case has satisfied these conditions. There are many other sites, including disused mills, within the Calderdale catchment that do not sit within Greenbelt Land that could be considered for development before ruining for ever the Greenbelt Land in these sites.

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

3. Loss of Wildlife Habitats I often see wild deer running through the fields. I regularly witness squirrels, pheasants, bats and foxes in the area. Para 177 NPPF states that ' The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site'. I would argue that building on the land which is included in these proposals will be extremely detrimental to the wild animals within the area. No mitigation can prevent the impact of urban sprawl and the destruction of their natural habitats.

4. Lack of Infrastructure The local schools are already full. The local dentists have long NHS waiting lists. The GP surgery is full and often can't accommodate appointment requests. Adding an additional 600+ houses and the associated increase in residents is simply unsustainable. The local bus services are already inadequate for the community. The 503 which passes through West Vale is often so full that it does not stop to pick up passengers at peak times or it is delayed 20-30+ minutes because of the traffic. The 343 which passes through Saddleworth Road only once per hour takes up to an hour to reach the destinations of Huddersfield or Halifax. The bus stops for the 343 are only on one side of Saddleworth Road, making it extremely unsafe for the young and elderly alike. Since moving here and hoping that my teenage children would be able to get the bus to school, we have found that it simply is not feasible or safe for them to do so. How will adding additional residents - who will also need to use their cars - improve this situation? The local roads are already riddled with potholes and are constantly patched (an unsatisfactory and

unsustainable situation). They are constantly under repair as the local drainage system is ineffective and causes regular surface issues. Add to that a level of increased traffic caused by the development as proposed and the road conditions will be worsened even further. Specifically with regard to site LP0026, the preferred access as stated on the plans is off the lower section of Scar Bottom Lane. For anybody who knows this road and uses it regularly, creating an access point on it to this housing development is ridiculous. It is a narrow lane with no pavements and dry stone walls at either side. It is already not wide enough for 2 cars to pass without having to come to a virtual standstill. It is certainly not wide enough to create an access point for 60-70 houses. I can see nothing in the proposals to remedy the lack of infrastructure. 5. Traffic congestion, air pollution and noise pollution Greetland and West Vale already suffer chronic traffic congestion, with the roads used not only by locals but also by the large wagons travelling to and from the Bosch Industrial Estate and the Sonoco factory. In addition, the road is used as a cut through from Ripponden and the M62. The village is already at breaking point at peak times and the roads cannot cope with the existing volume of traffic, let alone adding to that with these proposed developments. At school drop off times Saddleworth Road becomes a single lane road due to the parked cars on both sides. It becomes an obstacle course to get through and the large lorries that frequent the area make it dangerous for road users and pedestrians. I fear for the lives of the children trying to get to school daily. Adding the level of traffic that would be inevitable with the proposed development would be frankly overwhelming. By increasing the congestion in the area, the air pollution will by default increase. This will especially have enormous impact on the young children attending the schools in the area and Sunnybank Pre-school with its playground just metres away from the busy congested road. Similarly, a disproportionate scale of building in this area would create a disproportionate increase in the level of noise pollution to this community.

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

Duty to Co-operate Reason:

I do not understand what this means.

Suggested Modifications:

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

Comments:

Additional Evidence Link:

Comment ID **HRU721**

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

Person ID: **1116556** Name: **Mr Roger Nichols** Organisation:

Agent ID: Name: Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

We understand that the whole development from West Vale west up Saddleworth Road will increase the population of the area considerably and reduce the extremely precious green belt space between Greetland and Barkisland. Once green belt land is lost it is never regained. While some building may be necessary for new housing in the West Vale area we feel that the western end of the development proposed up Saddleworth Road should be totally preserved as green belt to maintain the character of the area along with the existing wildlife of the area. There are a number of brownfield sites available for development, for example the demolished mill at the bottom of Saddleworth Road, in addition to many brownfield areas round Calderdale and in Halifax. At no time should green belt be even considered for development when numerous brownfield sites are available in the area. A particularly important concern is the access to facilities in the area for residents. As far as we are aware the schools are full as are the doctors and dentists. There is already a shortage of doctors both locally and nationally hence more housing will make an existing problem worse. It is already difficult enough to get an appointment within a reasonable time at our local medical centre without more people having to be accommodated. A second major concern is the traffic flow in the area. Saddleworth Road already carries a large volume of traffic and at rush hour the congestion at the traffic lights in West Vale can cause considerable problems. Increased housing, and hence car numbers, will only make the present problems even worse and increase air pollution caused by slow moving and idling engines. Following the recent storms we have again experienced a massive amount of water running off Norland Moor and down the hillside into the valley. At the time of writing there is a constant stream of water running down the roads and gardens and into the valley below. This water has to go somewhere and will flood sites lower down the valley . With global warming the storms will only become more severe and more frequent with all the consequence this will bring. As far as we are aware there is not a massive unemployment problem or large number of homeless families in the area so why do we need such a huge increase in housing provision? There is a bungalow for sale on Trenance Gardens which has been on the market for the best part of twelve months so where is the shortage of housing? If the idea is to create dormitory areas for people who work in Leeds or Manchester this is extremely impractical. The M62 is already very congested during the day and at rush hours is totally jammed. The train service through the Calder Valley is extremely poor and unreliable as has been highlighted recently in the media. Finally, If there is a demonstrated demand for more housing it should be allocated fairly round the whole of Calderdale not concentrated in one particular area. For example, is there a development plan for the Stainland Road 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:

Comment ID **HRU726**

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

Person ID: **959779**

Name: **Mr Stephen Cunningham**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

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

Sound Reason:

My objection to the proposed planning application is referenced where possible using sections of the National Planning Policy Framework (NPPF) the relevant paragraphs are referenced in brackets Negative impact on the Green Belt The proposed development represents a disproportionate amount of new development in Greetland. It will lead to urban sprawl (NPPF 134a); it also encroaches on important green space (134c), removes natural habitat (174a) and takes away an integral part of the wildlife corridor (170d). It will also have a negative affect on the character and beauty of the local are and environment (170b) The Government supposedly attaches great importance to the Green Belt (133). The aim of Green Belt policy is to keep the land permanently open for the benefit, enjoyment and wellbeing of people. It also exists to support biodiversity and enhance the local landscape and visual amenity (141). If the proposed application ; along with other similar proposals - is passed we lose the Green Belt forever. This should only happen in exceptional circumstances (136). What are these exceptional circumstances? This proposal would be harmful to the Greenbelt so should not be approved (143). I have lived in Greetland for many years and seen large areas of green space lost to infilling. The demolition of older properties to accommodate new housing developments has led to the loss of trees, wildlife habitat and buildings of historical interest. We have also lost moorland; large gardens have been built on, even graveyards and recreational space has been developed. The argument for this infilling from Calderdale Council has always been that unless we accept it we will lose the greenbelt! Now that there is no place left to infill they want to start taking away the greenbelt. If we carry on like this Greetland will lose all its green space and biodiversity. The function of the Calderdale Council Planning Department is to facilitate sustainable development that make a positive contribution to the local environment (144). It is NOT the role of the Council to make unacceptable sites within the Green Belt available to meet their housing targets. Flooding The proposed development will only add to our current climate change problems. This is already in the balance. On Sunday 9 th February I parked next to the Black Brook in West Vale to buy groceries. The water line was close to bursting. I then walked towards the rugby club on Stainland Road where the river Calder had overflowed into the nearby fields. The football pitches and rugby club were under several feet of water. Buildings and cars were completely submerged, roads barely passable. I also discovered later that a large shipping container used to store equipment at the rugby club had been washed down river and had collided with Elland Bridge ; only recently re-opened in 2016 after previous collision damage during a flood. How can Calderdale Council declare a 'Climate emergency' then allow this development to proceed? The loss of flood plain and increase in run-off water from the proposed developments will only increase the likelihood of such devastation and further reduce local resilience to climate change (155, 156, 157). It will not only increase the flood risk in West Vale and Elland (163) but other areas along the Calder. Infrastructure The development ; in conjunction with others ; will place a great strain on local services. Will new schools be built? How will the road network cope? The sewage and drainage systems are already at full stretch. Will there be new Health surgeries and Dental practices built into the proposals? This isn't acceptable to the local community (124) and it will not improve the character or function of the local area (130). Traffic impacts, congestion and air pollution Congestion at the junction of Sadleworth and Stainland Roads ; often backed up as far as Greetland Infants - is already unacceptable. At present it can take 20 minutes to get through the junction at peak times. Adding all the extra commuter traffic from the proposed development will increase congestion and the levels of harmful greenhouse gasses - nitrous oxide, carbon dioxide etc. This will have a detrimental affect on the health of local people particularly children at the school. The

NPPF supports a low carbon future that helps to reduce greenhouse gasses and minimises flood risk (148, 149, 150a,b) not increase them. The proposed development is not sustainable in NPPF terms. It actually goes against many key criteria set out in the NPPF. When the harm identifiers are considered the proposals is not even close to being sustainable. I don't think Calderdale Council could actually have got it more wrong ; and they talk about a Climate Emergency! Not for the first time I watched this Climate Emergency play out in front of my own eyes last week; flooded roads, rivers bursting their banks, cars under water, homes and businesses completely destroyed ; real people devastated. It's easy for Calderdale Council to stand up and say anything - I think the time has come for them to stop talking and start taking some positive action to help local people and their communities.

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

Duty to Co-operate Reason:

Suggested Modifications:

Revise the Local Plan to make it fit for purpose and accommodate the new political and economic environment.

Comments:

Additional Evidence Link:

Comment ID **HRU729**

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

Person ID: **1243225**

Name: **Mrs T Hoyle**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I would like to object to the proposed plan for Greetland. I do not consider it wise to use Elland as the proposed planned area rather than Greetland as they are two different areas. Green Belt should be left for any number of wildlife that use it as their natural habitat and consider it a very important part to play for the present but also our future generations to understand and enjoy. These areas are becoming less not more and should be protected as much as possible. Similarly the plan would have more of a detrimental affect on the Environment by increasing pollution not decreasing which as far as I am aware we are all being asked to play our part with Global Warming become more of a threat. Much more carbon use will be added where we should be decreasing again not increasing, along with the increased burden on our local schools, medical centres and dentists. I just feel that this development has not been thought or planned correctly at all. Our roads are already congested particularly at the road junctions around Greetland and West Vale both in mornings and mid to late afternoons. Imagine what extra pressure that puts on the local area. Flooding is becoming much more of a major problem and again very much around the West Vale area where apart from the River Calder rain water runs down from the hillside and collects so again without forward planning to help this flood area adding extra drainage and sanitation is only to going to create more. I thought we were living in an age where we were supposed to be planning our villages, towns and city's with much more forward thinking to be kinder on the environment, awareness of our natural surroundings so the children of the next generation will be much kinder and far more aware than this proposal.

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 **HRU737**

Site ref (if applicable): **LPo177**

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 only modifications that are realistic for the local plan for "Elland" are to develop existing brown field sites rather than greenbelt. 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 plan for 600 properties equates to around 30% of the current properties. This site is a component of this total of 600 property proposal. Flooding: 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. The Environment Secretary has stated that extreme rainfall events such as this will become more frequent as a consequence of climate change. Therefore flood plains will become ever more important to -"slow the flow" and reduce the peak river levels further downstream. To build houses here is inappropriate both at a very local level and further afield. 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 wildlife: 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.

Comments:

Additional Evidence Link:

Comment ID **HRU749**

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

Person ID: **958865**

Name: **Mr Andrew Jones**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Although I do not consider myself qualified to say whether or not this is legally compliant it does seem that rules regarding planning have not been adhered to with regard to cooperation/consulting as I do not know of anybody who has received any information or contact from the council regarding the removal of this land from greenbelt. Everything people have found out is either via facebook or word of mouth. Also my understanding of the planning framework is that it states that sites to be removed from greenbelt should only be done so under exceptional circumstances. In my opinion there are NO EXCEPTIONAL CIRCUMSTANCES.

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

Sound Reason:

The land which is currently under greenbelt is home to many different types of wildlife. Within this plot alone I have seen foxes, rabbits, kestrels, buzzards and bats(now a protected species). I have heard the sounds of woodpeckers and at night you can also hear owls. In the woodland to the other side of the brook I have seen deer and the brook is home to trout. By building on this land you take away the natural habitat of these animals and the wildlife will suffer. Recreation - All of the wildlife above is part of what many people (myself included) enjoy about walking for pleasure and relaxation in this area. If this land is taken out of greenbelt and developed that enjoyment will be gone for good. Flooding - Part of this site is a flood plain for the brook. to build anything on this area is simply irresponsible due to the effect it could have on both the residents of any new houses and the residents of existing houses in the vicinity. 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 (or anything else) is built on these fields then the water will simply run off and flood the area below more rapidly. Traffic - The developments which are proposed along Saddleworth Road (which this plot is a major

part of) suggests a total of 600 houses to be built. Most households nowadays own a minimum of 2 cars each. this means a minimum of 1200 extra cars will be using Saddleworth Road. The junction of this road with Stainland Road is already unable to cope with the amount of traffic at peak times. With the proximity of the buildings to the road and junction there is no room for road widening for extra lanes, etc. I myself have witnessed many near misses at the set of lights at this junction caused by the frustration of drivers not being able to progress their journey in reasonable time. Adding extra traffic to this junction would be crazy and irresponsible in my opinion. The extra traffic would also create an increased road safety risk for the school and for the residents of Saddleworth Road. Pollution - The additional traffic would also create considerable extra pollution to the people of Saddleworth road, the pupils at the school and the people of west vale due to the huge queue of cars which would be backed up the road due to the inability of the junction to cope with the traffic. All these cars would be travelling at crawling pace with their engines idling. Urban Sprawl - so many additional houses would massively increase the size of Greetland (the figures only show a small percentage increase as we seem to have been classed together with Stainland and Elland). This is not a true representation of the facts. Our address does not read 'Greetland, Elland'. Services - The local schools are already at capacity and would struggle to take any more students. The doctors and dentists waiting lists are already stretched and would become unable to cope. The NPPF states that land should only be removed from greenbelt in exceptional circumstances and when all other brownfield sites have been used up or considered. There are other sites in the area (such as the mill which has been demolished in west vale) before even considering the greenbelt in question. When I have looked up the other potential sites which have been considered and rejected, the reasons given for rejection are 'greenbelt', 'sloping site', 'flooding and drainage issues', 'no developer on board'. The only difference I see with the sites which have been rejected is that most say 'no developer on board'. Just because a developer may be on board or interested in the sites on Saddleworth Road does NOT automatically mean there are 'exceptional circumstances'. They don't care about the wildlife, the congestion or the flooding. They just want greenbelt because its easier money.

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

Duty to Co-operate Reason:

As a resident of Greetland I have not received any form of contact from the council regarding the considered development sites. Nor have I heard of anyone else having received any contact or consultation. The people I have spoken to feel there has been no cooperation or consultation with the whole process

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU752**

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 **HRU755**

Site ref (if applicable):

Person ID: **960048** Name: **Mr Gerald Standcliffe** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

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

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU760**

Site ref (if applicable):

Person ID: **1243285**

Name: **Mrs Karen Bagley**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

We are writing to register our objections to the planning proposal off Saddleworth Road, Greetland. The reasons for objections are widespread but the most critical are as follows: FLOOD PLAIN ; the area proposed is on a natural flood plain and natural springs flowing down the Greetland hillside culminate at the proposed site. There is photographic evidence that local houses are subject to flooding already, so any further building would have a catastrophic effect on flooding in the area and beyond to West Vale and Elland. (Elland Bridge collapsed in 2015; Park Road in Elland floods every year; Heath Rugby club and Newbank Garden Centre in West Vale, prone to flooding regularly). There is photographic evidence to support this from residents as at today's date 9 th February 2020, when the flooding is at it's peak. GREEN BELT ; this is green belt land and as such, should be protected. Why aren't the council considering all the 'brown field' sites as a priority? This is a wildlife corridor - there are many protected species of animals and birds in the area, and it is used as a nature walk by all the community. POLLUTION / AIR QUALITY ; The pollution caused from a further potential 1200 cars on the roads is unimaginable and the health of the Junior School children would be at a high risk as would the whole community. It is a fact that increased pollution would seriously affect the health of our children both now and in future generations.

INFRASTRUCTURE - the infrastructure is simply not geared up to cope with 600+ houses in that area, this would constitute a small 'village' in it's own right! Traffic is already chaotic in West Vale, how could the area cope with another 1200 cars in the area? Doctor's surgeries are already at capacity and the local school has no capacity to extend. We appreciate that there has to be a certain percentage of new housing developments in every village and town but a proposal for 600+ houses in this area is not acceptable on any level. This would cause catastrophic consequences to the area of Greetland and surrounding villages. This is in addition to a further potential development ; LP1407, which should be taken into consideration prior to any decisions on LP0026, LP0177, LP0952 and LP1625.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU765**

Site ref (if applicable):

Person ID: **1243284**

Name: **Mr Martin Bagley**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

We are writing to register our objections to the planning proposal off Saddleworth Road, Greetland. The reasons for objections are widespread but the most critical are as follows: FLOOD PLAIN ; the area proposed is on a natural flood plain and natural springs flowing down the Greetland hillside culminate at the proposed site. There is photographic evidence that local houses are subject to flooding already, so any further building would have a catastrophic effect on flooding in the area and beyond to West Vale and Elland. (Elland Bridge collapsed in 2015; Park Road in Elland floods every year; Heath Rugby club and Newbank Garden Centre in West Vale, prone to flooding regularly). There is photographic evidence to support this from residents as at today's date 9 th February 2020, when the flooding is at it's peak. GREEN BELT ; this is green belt land and as such, should be protected. Why aren't the council considering all the 'brown field' sites as a priority? This is a wildlife corridor - there are many protected species of animals and birds in the area, and it is used as a nature walk by all the community. POLLUTION / AIR QUALITY ; The pollution caused from a further potential 1200 cars on the roads is unimaginable and the health of the Junior School children would be at a high risk as would the whole community. It is a fact that increased pollution would seriously affect the health of our children both now and in future generations. INFRASTRUCTURE - the infrastructure is simply not geared up to cope with 600+ houses in that area, this would constitute a small 'village' in it's own right! Traffic is already chaotic in West Vale, how could the area cope with another 1200 cars in the area? Doctor's surgeries are already at capacity and the local

school has no capacity to extend. We appreciate that there has to be a certain percentage of new housing developments in every village and town but a proposal for 600+ houses in this area is not acceptable on any level. This would cause catastrophic consequences to the area of Greetland and surrounding villages. This is in addition to a further potential development ; LP1407, which should be taken into consideration prior to any decisions on LP0026, LP0177, LP0952 and LP1625.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU799**

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

Person ID: **1243394**

Name: **Hannele MacNaughtan**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

Green Belt status is protected unless there are 'exceptional' circumstances. I do not believe these housing plans constitute 'exceptional' circumstances.

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

Sound Reason:

There are three main reasons I don't think this plan is sound. The first is that once we have lost the green belt it is gone forever. I regularly walk the public footpaths that cross not just this site but the other Saddleworth Road sites and see herons, deer, foxes and many other birds and animals. One of the great strengths of this area is it's green spaces and easy access to countryside. It would be detrimental to lose and destroy this. The idea that a few native trees, or, wild hedges could make up for the damage is naive. There is no evidence of an 'exceptional' need to merit changing this land from it's green belt status. Secondly, at a time when Calderdale is once again suffering from flooding and the frequency of such storms is known to be increasing how can it make sense to build on a much needed flood plain. This will not be effective in reducing Calderdale's flood risk. Thirdly, the traffic is already heavy around the area and the West Vale junction regularly grinds to a halt. The addition of so many more cars and journeys would strain this further and worsen traffic conditions. The local schools, doctors, dentists etc are not in a position to take in more students, patients. The infrastructure of the area would be strained. All three of these reasons reflect that the plan is not justified, effective or consistent with national policy.

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

Duty to Co-operate Reason:

I only found out about these latest proposals through a friend and then in a letter from Craig Whitaker. I

have received no communication from the council.

Suggested Modifications:

The Green Belt status should be left in place and alternative and creative solutions found by Calderdale Council to repurpose land/buildings that are lying unused/derelict elsewhere in Calderdale which would bring about regeneration and improvement to those areas rather than damaging this area.

Comments:

Additional Evidence Link:

Comment ID **HRU802**

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

Person ID: **1243406**

Name: **Mr Nigel Revitt**

Organisation:

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:

Infrastructure consideration, can they cope with the increased demands. Public services - can they cope West Vale traffic lights - chaotic now

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

Duty to Co-operate Reason:

Suggested Modifications:

I am not convinced that any detailed analysis has been carried out, especially as this borders a flood plain.

Comments:

Additional Evidence Link:

Comment ID **HRU806**

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

Person ID: **1243003**

Name: **Mr Richard Corney**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

The Local Plan does not address the implications of the National Planning Policy Framework, especially,

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

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

Sound Reason:

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

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU810**

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

Person ID: **1243147**

Name: **Mrs Sue Corney**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

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

Sound Reason:

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

development particularly birdlife such as Herons, Kestrels, Kingfishers which are seen very regularly flying around the area. 5 Traffic Congestion It is already extremely difficult to pass through the traffic lights at West Vale and the development will only add to the congestion both in West Vale and also Ripponden. 6 Loss of Public Space The area concerned is a very valuable green space for people of all ages to enjoy daily and is extremely popular with walkers, runners, etc. It is a really tranquil spot where people can get away from the stresses of life. It is also within walking distance of the local community and therefore people do not have to drive to enjoy the countryside.

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

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU821**

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

Person ID: **1130155**

Name: **Mrs Kathryn Crowther**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

I consider the plan not to be legally compliant. Until recent awareness was made by the Greetland community setting up a local action Facebook group and a local meeting also organised by a couple of Greetland residents very few people were aware of the local plans. I live adjacent to the proposed site and have had no notification of the proposed building from anyone other than the local action group. The local plan is also very misleading as the proposed sites (LP0026, LP0177, LP0952 and LP1625) all come under the Elland Ward. Elland is over 2 miles from the proposed sites. This could mean that many people would fail to see that there are areas within the local plan that are in Greetland. The process in which to make an objection is also very complicated and hard to find. The questions asked in the process are also very complicated and unclear. I also know many other residents have struggled with the system as it has not been easy to navigate and understand.

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

Sound Reason:

I do not consider the plan to be sound due to such a disproportionate amount of building within a small village. Has the plan been revised since Brexit. Greenbelt. The greenbelt land proposed for building is supposed to be protected land. There are no exceptional reasons to remove the area from greenbelt status. Greenbelt is there to prevent urban sprawl which the plan seems to be going against. Has the council considered using other brownfield sites?. 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 affect on the communities health and well being. As it is regularly used by many including myself for safe walks with the children 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. Flooding. Flooding is already an issue on the proposed sites (LP0026,LP0177,LP0952 and LP 1625). Since 2015 this area has been under water many times the latest time being during storm Ciara this February 2020. The existing volume of water already causes flooding. Further development to these sites will only increase flooding to both the future homes but will have a detrimental effects on people and property particularly downstream in Elland, which has been badly hit over the last few years. It was only last week that the Army was called in to help with flood defences in Calderdale after storm Ciara hit. How is further development going to improve this? Changes in this land use will only Increase flooding. Air Pollution. Developing on these sites is going to massively increase air pollution within Greetland and surrounding areas mainly West Vale. Air pollution can cause both short term and long term effects on health. This is especially concerning as the proposed sites are literally next to primary school and pre school, 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 pollutes. This is also the case around West Vale where traffic currently bottle necks and remains stationary next to the West Vale primary school playground. Traffic Congestion. Currently West Vale cannot cope with the amount of traffic at rush hour. With traffic backing up significantly on all sides of the traffic lights. It was suggested by the council that the traffic lights in West Vale would be recalibrated to ease the increase in traffic. But in my opinion no recalibration will help, this is already a major problem. By creating more homes in this area will only add to this congestion as it will see significant increase in car usage as public transport in this area is limited. Calderdale are also planning to make a HGV turning circle in Ripponden to redirect HGV's through Greetland instead of Sowerby Bridge. Without all these future plans traffic around Sunnybank preschool a and the Greetland Academy at peak times is frightening and an accident waiting to happen. Wildlife. The Proposed sites for development is home to many protected species for example Bats, Owls, Herons, 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. Infrastructure. The amount of homes that is planned is disproportionate to the size of the village with no infrastructure plans in place to accommodate such a plan. The Doctors and Dentist in Greetland are already full and not taking on new patients. The road network and sewerage system will also not cope with such an increase. 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. Hertiage . Bradley Hall farmhouse is a grade 2 listed building which is located very close to the proposed sites (LP0026,LP0177,LP0952 and LP 1625). Historic England points out that special re guard should be had to preserving listed buildings and their settings. This does not seem to be considered in the plan.

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

Duty to Co-operate Reason:

Sites with suitable infrastructure or brown field sites should be considered before greenbelt is destroyed.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU824**

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

Person ID: **1130193**

Name: **Cllr Paul Bellenger**

Organisation:

Agent ID:

Name:

Organisation:

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

Legal Compliance Reason:

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

Sound Reason:

Air Quality. The suggested sites, listed above, earmarked for development, sit within an area of topographical challenges, an area which starts at a river level of 134m above sea level rising to 191m within a distance of 0.94 miles to one side and similar distance and height to the other, with this in mind the proposed developments would be situated within the basin of a narrow valley. Topography plays a major role in controlling the atmospheric boundary layer over complex terrains, thereby affecting the mechanisms of air pollution transport in urban valleys. The transport of air pollutants emitted from urban areas located in valleys results from the interaction between several phenomena which can include low-level temperature inversions, urban heat island (UHI) effects, the development of slope and valley winds, and different mechanisms of re circulation or stagnation of air pollutants. Different combinations of these factors can strongly influence the air pollution transport in valleys and, therefore, may lead to severe air pollution events with important implications for public health. DEFRA have already set authorities challenges to improve air quality but also reduce emissions, especially road side emissions like Nitrogen Dioxide. The creation of 600 properties within this valley bottom would contribute to increasing NO2 levels, which sit around 80% at roadside and with vehicular movement at certain times of day being at a standstill or slow moving, these levels would struggle to dissipate within an acceptable time. The above factors can only be improved upon by reducing vehicular movement within the valley bottom rather than adding to it. Flood Risk The above three sites are located within a high flood risk area, an area which is a natural flood plain for the valley and which help slow the flow to areas further downstream. The removal of these areas would certainly increase flood risk to areas which at the moment narrowly avoid flooding. Our climate has seen such a change that the valleys within Calderdale are more at risk than ever and has now put us as an authority to call on government to provide extra funding to help protect us against the loss of properties, businesses and potentially lives. Allowing development within high risk flood plains would be a contradiction to something we are trying to prevent. of the NPPF states that, inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. Transport and Congestion The B6114, which runs parallel to the proposed development sites, currently, has poor transport links to other parts of Calderdale, this route currently has one bus per hour, this is due to the route being classed as semi-rural and infrequently used by residents, this route is not financially viable to bus operators and therefore limited to the one per hour. The lack of public transport comes at a cost to the environment as this sees increased vehicle numbers to the B6114, this road connects to the B6112 via a 4 ways traffic light system. Both roads become heavily congested between the hours of 7.30 am to 9.30 am and again between the hours of 3.30pm and 6pm which can sometimes see vehicles take anywhere between 20 to 40 minutes to navigate through the traffic light system. A contributing factor to this is caused from the nearby M62 motorway when diversions are in place or congestion around Junction 23. A further 600 properties could potentially add an extra 1200 vehicles to the area and the possibility of around 2400 extra journeys per day to what is already a congested road network. Infrastructure The infrastructure to this area is already experiencing issues, issues such as lack of school places, waiting lists to NHS surgeries, Low water pressure, poor gas supply and again poor public transport links, all of which are classed as critical infrastructure. Ecology, Biodiversity and conserving the natural environment. Ecology enriches our world and is crucial for

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

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

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

I would agree with other objectors and a concern which i have already made regarding the difficulty to navigate the site to this point.

Suggested Modifications:

Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development

Comments:

Additional Evidence Link:

Comment ID **HRU829**

Site ref (if applicable): **LP0177**

Person ID: **1130132**

Name: **Mrs Julia Caldwell**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

I would like to draw your attention to a letter from the MPCraig Whittaker attached questioning the legality of some of the process. In November 2016 these areas defined as Lp0952 Lp0177 were classed as highly sensitive green belt. On the recent local plan map these areas are no longer defined as greenbelt. There needs to be an understanding as to why this designation has been changed and the legality of it. £2m funding to -"ensure the UK greenbelt remains untouched and protected" by preventing illegal greenbelt development. The move is part of the Housing Minister's drive to protect the Green Belt for future generations. <https://www.gov.uk/government/news/cash-boost-to-crackdown-on-illegal-building-on-nation-s-green-belt> 'Only in exceptional circumstances can land in the Green Belt be built on'. What are the exceptional circumstances? Otherwise this is illegal. Indeed, there are a number of instances where Calderdale Council has denied planning permission of an extension because it was on greenbelt! There is generally a presumption in favour of development in planning. The onus is placed on the local planning authority to provide sound planning reasons why a planning application should be refused permission. In areas designated as Green Belt, the presumption is reversed and the onus is on the developer to demonstrate (with very special circumstances) why permission should be granted. This difference makes Green Belt an exceedingly restrictive policy. ref: <https://www.local.gov.uk/sites/default/files/documents/green-belt-244.pdf>

Do you consider the plan to be Sound?: **No**

Sound Reason:

Flooding The land floods and therefore it is unfit for any building use. Additionally any building here would affect other areas susceptible to flooding and potentially cause more damage. We have video and pictures of this flooded land if you wish to see it. I am concerned that the underground springs, which will have to go somewhere, will damage the existing houses and cause subsidence. Clay soils are notorious for the presence of naturally occurring underground springs and water courses we know we have in this area. Because of the way in which clay soil shrinks, swells and cracks, these water courses have a nasty habit of moving slightly from year to year. With additional building I am concerned that existing houses are likely to be affected by subsidence. Highways The roads surrounding this land are already at maximum capacity. West Vale, Stainland and Greetland infrastructure cannot cope with the amount of traffic that currently use the roads, and this situation (accidents, commuting times, congestion, environmental health, air pollution etc) will worsen with the amount of housing that has been suggested here. 600 houses in Greetland, an area with the highest number of cars per household. Ecology Trees and vegetation on this Greenbelt land is extremely valuable for flood prevention and climate change mitigation. Since this land floods already, this will worsen if it is built on. My children and their friends use the fields and stream to look for animals, explore nature and learn about the natural environment. In a world of computers, phones and video games this beautiful, diverse and tranquil area cannot be taken away. The bird life who use the field is rich: Jays, woodpeckers, owls, tits, finches, herons, sparrowhawks and Kestrels are regular visitors. We have also had parakeets visit in the summer. Bats and foxes also class this area as their home. Wildlife is an important part of this area and supporting this life is a whole other level of smaller animals and wildlife. Open Space Greenbelt is the fresh air that we breathe between the congestion of the over-populated roads. We must protect Greenbelt land as increased pressure is applied for more and more roads and

more housing. Greenbelt open space brings social, economical and environmental benefits. These in turn bring about benefits for citizens, which in turn reduce the need and demand for social care and other council services. I am proud to live in Calderdale with its mix of urban and rural landscape, in particular this area of Greetland where I live. Without the Greenbelt status and protection, countryside will be lost. This proposed building will irreversibly damage our land. Environmental Health Air Pollution: one claim is that air pollution causes in excess of 100 premature deaths per annum in Calderdale. Taken from Calderdale Council Website: 'Improving the environment in Calderdale is a priority for this Council. It is fundamental to our Vision 2024 ambition of the place we want to be in the future. We launched the Let's Clear The Air campaign to promote the work we are doing to: protect our distinctive environment; raise awareness of the issues and dangers; help people to be healthier; ensure our streets are pleasant places to live, work, play and visit'. Building 600 houses on Greenbelt on an already congested area of Calderdale goes against Vision 2024 and the aim to improve air quality. Currently the Council's monitoring concentrates on traffic-related nitrogen dioxide, which has been identified as exceeding the air quality objectives in seven areas. These areas have been designated as Air Quality Management Areas (AQMAs). One of these areas is Salterhebble and Huddersfield Road, upon which the majority of the population of Greetland commute through daily. If the Council agree to building more houses in these areas, there will be further damage and air pollution. Furthermore - children living in West Vale and Greetland attend the schools and nurseries which are situated on the main roads, right next to the queuing cars. It is a public health crisis. Other comments The information was not provided by the Council that the land was in fact being considered to be built on. We 'found out'. The accessibility of the website, consultation and objection process is not easy and could be construed as being hidden, difficult to use and not a fair process. Goodness knows how someone without computer skills, literacy skills or with learning difficulties could access this.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans' (NPPF, para. 179). The land is not cross border, however the impacts of additional housing in the area needs to be considered across borders. Has there been constructive, proactive and ongoing consultation with other local authorities to determine the effect on traffic congestion, infrastructure, climate change and biodiversity? Has there been consultation with: the Environment Agency the Historic Buildings and Monuments Commission for England Natural England Public Health England the Homes and Communities Agency Calderdale clinical commissioning group established under section 14D of the National Health Service Act 2006 the National Health Service Commissioning Board What is the result of these conversations and have the following been addressed: Air Quality Aspirations for the area Social issues Environmental issues

Suggested Modifications:

Remove 600 houses from Greetland from the local plan. Use existing Brownfield sites. Reconsider how many houses do actually need building.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5608260>

Comment ID **HRU832**

Site ref (if applicable): **LP0177**

Person ID: **1243415**

Name: **Mr Paul Sutcliffe**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

I don't believe building on 'flood plains' can be classed as legal full stop! Please refer to Calderdale's Statement of Community Involvement, which has not been followed in this process. CMBC have already stated "These sites lies within the approved Green Belt. The proposed development does not meet the exceptions, as it does not preserve openness and conflicts with the purpose of including land in the Green Belt. As such, it represents inappropriate development in the Green Belt, which is, by definition, harmful. No very special circumstances have been demonstrated to clearly outweigh the harm caused by the development. It is therefore considered that the proposal would be contrary to NPPF Chapter 13 (Protecting Green Belt Land)"

Do you consider the plan to be Sound?: **No**

Sound Reason:

LP0026, LP0177, LP0952 and LP1625 are so close in proximity that they should be viewed jointly as well as individually. They are all in the Greetland ward so why have they been recorded on this plan as Elland. Main points of objection 1: Flooding 2: Loss of green belt and impact on wildlife corridor 3: Air Pollution and Traffic 4: Infrastructure 5: Urban sprawl Flooding We have seen first-hand the devastation caused by the recent floods (Boxing Day 2015 and 8 th -9 th February 2020). Every proposed site flooded. The upland sites LP0026, LP0952 and LP0952 were rivers, the land already saturated by the vast amounts of natural springs this area has. The lower level part of LP0177 was indistinguishable from the river. The flood plains that these sites provide are critical and flood regularly ; soaking up excess water at times of rainfall, allowing space for the water to flow and be stored on open land in times of flood, even after the river has burst its bank, and protecting land further downstream from potential flooding. The development of this land will increase flood risk further downstream towards Westvale, Elland and Brighouse (Evidence of which can already be seen on Social media sites, Calendar and national news outlets). To develop on these sites would contradict the DEFRA plan and the NPPF. The DEFRA 25year plan states that "National flood management involves the use of a variety of measures including storing water on open land". NPPF 14 (157b) states that plans should work to safeguard land from development that is required or likely to be required for current and future flood management. The current policy and legislation on flooding states - "due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere. Chapter 14, paragraph 163 of the NPPF states: -" When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere It is abundantly clear that any development on these sites would directly oppose all these pieces of legislation and policies and would hugely increase the risk of flooding to both surrounding properties and the wider community in Greetland, West Vale and even as far as Elland. Any development of these sites and reduction in the capacity of these flood plains will only ensure that the flooding we now see will be more frequent and cause even more damage. This is not acceptable or fair therefore these sites should be removed from the local plan. Loss of Green Belt and Wildlife Corridor Calderdale's Green Belt Review map of 2020 clearly shows that all proposed sites in the Greetland ward are 'Most Sensitive Green Belt Parcels'! Does this mean the council disregards its own statements? Esther McVey, our current Housing Minister's written policy on Green Belt land states "protecting the Green Belt goes beyond protection against development" NPPF chapter 13 states that there are 5 purposes to green belt land- CMBC has already stated that this land strongly fulfils

these 5 purposes. NPPF ch13 paragraph 143 states "Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances". Protecting the green belt is very important. To include these sites in the local plan goes against all the above policies and there is no evidence of any special circumstances to support development on this land. The sites are a wildlife habitat for many different species. CMBC has already stated that a constraint is that Black Brook running through LP0177 is a UK BAP priority habitat. NPPF Chapter 15 states that planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes and sites of biodiversity. It also states - to protect and enhance biodiversity and geodiversity, plans should: identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including wildlife corridors. Developing these sites will put this precious wildlife corridor and all its inhabitants at great risk directly opposing the NPPF legislation and the DEFRA 25 Year Plan. This site should therefore be removed from the local plan.

Air Pollution and Traffic Congestion Air pollution and traffic congestion obviously go hand in hand. The junction of Saddleworth Road and Stainland Road in West Vale is already a bottle neck and far too congested and unable to cope with the traffic volume that passes through it on a daily basis. WSP Parsons Brinckerhoff Report on this Transport Network identifies that traffic congestion at the juncture of Stainland Road-Saddleworth Road would increase by approximately 105% traffic congestion at the juncture of Stainland Road-Rochdale Road would increase by over 100% Public Health England (PHE) (11th March 2019) reports that air pollution is the biggest environmental threat to health in the UK, with between 28,000 and 36,000 deaths a year attributed to long-term exposure. There is strong evidence that air pollution causes the development of coronary heart disease, stroke, respiratory disease and lung cancer, and exacerbates asthma. Professor Paul Cosford, Director of Health Protection and Medical Director at PHE, said: "Now is our opportunity to create a clean air generation of children. Key interventions local authorities can take include redesigning cities so people aren't so close to highly polluting roads." Professor Cosford said: We recommend that at a local level, any new policy or programme of work which affects air pollution should aim to deliver an overall benefit to the public's health. Greetland School and Sunnybank Pre School are right on Saddleworth Road at the boundary of LP0177. The increase in traffic of over 100% and therefore pollution, that will be an outcome of development on this site ignores all the recommendations of PHE and put many people's health at risk especially that of our children which is totally unacceptable.

Infrastructure Greetland Primary Academy, West Vale Primary School and Brooksbank High School are all full. With a proposed 600 houses, using Calderdale MBC's figure for school places of .36 per household (IDP section 9.14) this indicates another 206 school places would be needed. Where are these places to be found? Local Dentist has a waiting list of 600 for NHS places. The nearest NHS dentist was recently found (July 2019) 11 miles away in Kirklees. Local GP surgeries are already full. No plans have been put in place to cope with the expected population rise. Waiting times can already go beyond seven days and GP's are already pushed to 'breaking point'.

Urban Sprawl The following is from Calderdale Councils website regarding green belt land and urban sprawl: 'Green Belt - The functions of the Green Belt are to: check the unrestricted sprawl of large built-up areas; prevent neighbouring towns from merging into one another; assist in safeguarding the countryside from encroachment; preserve the setting and special character of historic towns; and assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. At what point do you stop building and filling in the gaps? Is the future name of our area going to be called BRIGELL WEST VALE GREET BARK ISLAND?

Summary There are so many constraints and negatives to all these sites that cannot be adequately mitigated against. To develop these sites opposes so many policies, recommendations and pieces of legislation which CMBC appear to have given little or no consideration to. I respectfully ask that these sites are removed from the Local Plan. They should never have been included as they are completely unsuitable for numerous reasons.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

There are so many constraints and negatives to all these sites that cannot be adequately mitigated against. To develop these sites opposes so many policies, recommendations and pieces of legislation which CMBC appear to have given little or no consideration to. I respectfully ask that these sites are removed from the Local Plan. They should never have been included as they are completely unsuitable for numerous reasons. Modifications All these sites should be removed from Calderdale plans and be replaced with potential brown field sites in accordance with government policy

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5608290>

Comment ID **HRU834**

Site ref (if applicable): **LP0177**

Person ID: **1128772** Name: **Mrs Marie Louise Murawa** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

There has been a complete absence of any consultation prior to formulating and submitting the hastily concocted LP to the Inspector.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Flooding Highways Ecology Open Space Housing Services Environmental Health Other factors Green Belt
Flooding With the extensive building already present on Saddleworth Road, the south side already takes the majority of the run-off of rainwater and springs. The proposal to build over six hundred additional dwellings, the majority being proposed on the south side, will cause a problem for the lower valley and West Vale. Whatever drainage is considered suitable will still direct the water to the lower valley and West Vale. Extreme weather conditions that we now seem to experience has shown how devastating the result can be in Calderdale. Highways Saddleworth Road has speed limits ranging from 50 mph, to 30, 20, and back to 30. With blatant speeding in the 30 mph zones, and stationary traffic in the 20 mph zone, at peak times, it is already difficult to navigate. There have been fatalities in addition to other serious incidents. With the prospect of over six hundred additional dwellings and two cars planned per household, Saddleworth Road will become a lengthy car park. There is no prospect of additional employment in the area, so all resident will be obliged to travel to work. Schools are already full subscribed, so would school children be expected to travel to school. Whatever is attempted at West Vale to ease traffic flow, roundabout, slip road, etc., traffic from four directions will still all converge on West Vale. Everyone is also aware that prospects of additional employment in Calderdale is limited, so any new developments on these sites will spawn commuters heading to and from Leeds and Manchester, with both additional pollution and traffic congestion Ecology Currently the valley enjoys the presence of; herons, squirrels, foxes, and other wildlife, who share the area, to the benefit of residents. Open Space Besides supporting farming, and the existing wildlife, the open spaces are enjoyed by walkers, cyclist, horse riders, and many others. They offer mental and physical wellbeing, dilute pollution, and allow vital recreation and exercise.

Once greenbelt/open space is lost it will never be returned. Is this the bequest we wish to leave the next generation? The north side of Saddleworth Road has already been over developed. The area has already had a disproportionate level of building for its size. To turn the whole valley into a housing estate would be a travesty. The existing green belt should be allowed to remain, with efforts being made to fulfil the housing requirements with brownfield development. Environmental Health The further addition of possibly 2000 domestic vehicles, which would entail travel to places of employment, education, or social and pleasure, outside the immediate area, would certainly not make for a better environment. Other Factors I have found that Calderdale's publicity surrounding these proposals to have been somewhat limited, and lacking in ensuring complete openness, and robust attempts at consultation with the community. I have found the website difficult to negotiate, and it has on occasion died on me. Calderdale's Local Plan Position Paper reports that there is -“considerable public disquiet over the allocation of land for housing on the south side of Saddleworth Road this disquiet does not seem to be well targeted other than objections to Calderdale MBC” Yes Calderdale MBC should be our first port of call, and if there are other bodies we should -“target” it would be helpful if OUR council made us fully aware of these. I would ask that the Council seriously reviews it's future requirements for housing to ensure that the figures it first submitted are brought up to date. Accessibility Access to and from Saddleworth road is difficult. West Vale is a bottleneck, Stainland road from Saddleworth Road, meanders through some single track country roads, and at Ripponden comes out at a busy T junction. Bus services are very limited, with West Vale being the closest hub. Green Belt Green Belt land has been removed from Local Plan proposals in other areas due to the ribbon effect. Because this is relevant to the land at the south side of Saddleworth Road, it should also be removed, otherwise it smacks of discrimination by Planning. On Calderdale's Local Plan in November 2016 the Green Belt survey for this area came out very strongly, and stated to be a -“highly sensitive area” This Green Belt is currently serving it's purpose;- It continues to be farmland for cattle, sheep, and horses. Helps to safeguard the countryside from encroachment and the merging of neighbouring towns. Helps to emphasise urban regeneration. Additional comments The infrastructure, in respect transport, highways, education, and medical, are totally inadequate for any massive development. Because there are many other areas including Brownfield sites within Calderdale which have not been considered for inclusion in the in the Local Plan, it smacks of discrimination.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU841**

Site ref (if applicable): **LP0177**

Person ID: **1243410**

Name: **Mrs Gina Walsh**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

1) The Calderdale Statement of Community Involvement 2015 states: -“We need to be very clear about what we are asking people and we must be sure that people understand what will happen as a result of this engagement. This includes being clear about what decisions have been made, what have not, and who will make the final decision.”“The proposed site is directly opposite my front door and a development on this site would have a huge impact for my family and our family life, yet to this day, I have never received a single piece of correspondence regarding this proposal, therefore lacking the clarity and involvement which the SCI calls for. With regards to the online portal, LP0177 is listed as part of Elland, which it clearly isn't. This is misleading and means it is easy for the site to be overlooked by residents who otherwise would want to state their objection. The process is far from 'simple' and is certainly not making it 'easy to get involved.' (SCI 1.3) 2) In the words of Esther McVey, Housing Minister's written policy on Green Belt land: -“Of course one of the most important environmental safeguards we have is the Green Belt. And I want to be clear that our commitment to this is as strong as ever, with any changes only happening in exceptional circumstances ; protecting the Green Belt goes beyond protection against development”“In these circumstances, our Green Belt is not being protected. In the local plan, this site is being referred to as 'green field' when it is legally classed as 'green belt' and therefore should only be built on under exceptional circumstances and 'when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including :- making effective use of suitable brownfield sites.' (The Government White Paper -“Fixing our Broken Housing Market”“Parag 1.39) There are other suitable brownfield sites in the local area which could be used and therefore would mean the 'right houses were being built in the right places.'

Do you consider the plan to be Sound?: **No**

Sound Reason:

Disproportionate amount of building in the Greetland area. As sites LP0026, LP0177, 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. Previous potential sites which were considered and consequently rejected (report CC37) stated that it would give a "disproportionate increase to Barkisland village". The increase based on the same dataset above would have been 16.6%. which is far less than the huge potential increase of up to 33.8% in Greetland. If this plan was to be passed, surely that would show a great inconsistency in policy and legality regarding planning applications. NPPF (para 133/ 134) also states that aim of Green Belt policy is 'to prevent urban sprawl' and 'to prevent neighbouring towns merging into one another.' The location of this proposed site would go against that ; there would be less clear boundaries between Greetland and Barkisland and the distance from local amenities would become an issue. The Inspector's letter of 16 th July 2019 to the Council notes (para 14) that: ' Local plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.' The site might be 'within a 0-15 minute journey of a town centre; is within 600m of Public Open Space; and within a 15 minute journey to a GP surgery' these simple benefits are irrelevant when it takes into account that the massive increase in traffic from the combined sites will increase travel time substantially, the local GP surgery is full and may no longer be within 15 minutes due to the increase in resulting traffic; that the

majority of the public open space is actually part of the local plan to be built on; that the 'cleaner air' that Calderdale is fighting for will be heavily polluted by the increase in traffic and associated pollution from our already crumbling infrastructure. Where are the benefits? NPPF (para 94) also states: 'It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: 28 a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.' Greetland does currently have sufficient school places to meet the needs of the existing community but not for the needs of potentially 600 more families. I can clearly state that no consideration or preparation has taken place to resolve the issue of school places with the local schools and, as our immediate schools are academies, they cannot be forced to expand. The only benefits I can see are short-sighted ways of meeting council targets and lining the pockets of developers ; no benefits for the existing community or for the people who would live in these houses.

Flood areas The NPPF states that planning policies and decisions should promote public safety and take into account wider security and defence requirements by: ' a) anticipating and addressing possible malicious threats and natural hazards... This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area . ' We should not be building on high risk flood areas, or in extremely close proximity to high risk flood areas in Calderdale. We are not like the rest of the country! We are a high risk flood area, within a high risk flood area! The news today (15/2/20) is full of stories of flooding in our area with the army currently in Calderdale trying to prevent a repeat of the devastation from Storm Ciara last weekend when this whole site flooded and residents of Woodfield Drive battled to try and stop their houses from flooding. If these fields (site LP0177) were covered in concrete, those houses WOULD have without doubt flooded as the extra volume of water would have nowhere else to go. Labour Council leader, Tim Swift, is urging the Government to grant Calderdale urgent assistance by recognising it as a 'Tier 1' authority getting extra funding support because it is one of a small number of areas of the country at "sustained risk" of flooding.' Not a flood risk as stated in the local plan but a flood certainty- an area which will flood repeatedly and has over the last 5 years. Additionally, the NPPF states that, ' due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere . ' The council's housing targets are not area specific so houses do not need to be built in Greetland on Green Belt in high risk flood areas. Due to the topography of our area ; sloping grassland, the trees, the flat flood plains and underground springs, we are not at threat of it happening as we are already seeing localised flooding. Building houses on any of the flood plains mentioned in the local plan will only turn this into a catastrophic problem like other villages / towns in the Calder Valley are experiencing. Houses built in a high-risk flood area are not sustainable as the NPPF requires them to be. Millions of pounds are already being spent to aid flood prevention and there are numerous reports of houses /businesses not being able to get insurance due to risk of flooding. These are not the types of houses which Calderdale needs. This does not solve the housing crisis ; it just causes Calderdale more problems and costs more money. Conserving and enhancing the historic environment NPPF (para 187) 'predict the likelihood that currently unidentified heritage assets, particularly sites of historical and archaeological interest, will be discovered in the future.' Combined with site LP0952 and LP1625, this area is clearly of historical importance with archaeological finds (post medieval stone skull) and historical buildings on LP0177 (18 th mill). Covering these fields in concrete and houses would not only have a negative impact on the lives of present day inhabitants but would do a disservice to the inhabitants of our past, destroying our local history irreversibly.

Air pollution 'There are legal requirements and aspirational targets for levels of different air pollutants. The government recognises that protective

health - and tackling air pollution - requires action, and is committed to improving the UK's air quality and reducing harmful emissions. The draft Clean Air Strategy, published in May 2018, sets out the case for action and demonstrates the government's determination to improve our air quality.' The proposed plan completely contradicts the Clean Air strategy, as the amount of land allocated on Saddleworth Road is disproportionate to the amount of land Calderdale has to allocate as a whole. 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. Such a disproportionately high increase in air pollution will have unthinkable implications for the children of our community. 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. 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.

Habitats and biodiversity To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity. 56; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation. 57; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity. 175. When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts) Living close to the site and having used the area personally and recreationally, I am fully aware of how this area is full of natural diversity. I personally have heard owls, seen deer, herons, foxes and numerous birds of prey. Although reports and assessments will be undertaken, no amount of adaptation or consideration for this wildlife would be better than simply just letting it be and not interfering. In the Calderdale Local Plan, land was removed from Stainland, which is far less sensitive, in terms of the risk development would pose to wildlife, biodiversity, habitat and landscape so if there is consistency in approach to planning, these sites should not be included in the Local Plan.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

As mentioned previously, Calderdale Council have done nothing to inform residents of the local plan. It could also be argued that listing all four local sites under 'Elland' and the complex method of objection were all strategies to stop residents having their say rather than co-operating with residents.

Suggested Modifications:

Removal of all Green Belt sites (LP0026, LP0177, LP0952 and LP1625) and a revision of brownfield sites for any new and existing opportunities both in our authority and within neighbouring authorities.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5608616>

Comment ID **HRU847**

Site ref (if applicable): **LP0177**

Person ID: **960062**

Name: **Mr Dean McIntyre**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

I previously submitted my concerns regarding the proposed residential developments on the Saddleworth Road, Greetland area when these were initially proposed. Due to living locally, I am concerned at the scale of the proposed developments and the impact that this would have on the local area. I do accept however that there is a requirement for housing as we move forward and that the Greetland area will have to have some further development. I believe that the proposed developments taken together are too much for this area based upon the following. As such I object against each proposal especially when taken as a whole. I accept that smaller scale development in the area as well as other areas in Calderdale is required, but more importantly is sustainable. Less than 150 houses in this area would be a more sustainable. Again the rest spread throughout the District would have less impact throughout the District. My objections regarding some of the proposed developments are similar. The main issue is the scale of development in this corridor. The impact of proposals LP0177(200), LP0952 (246), LP0026 (67) and LP1625(30) which would mean 543 houses being built in the Saddleworth Road corridor would have a significant impact on the amenities in the area as per the below. Traffic Congestion - The junctions of Saddleworth Road, Greetland and Rochdale Road, Greetland where they join Stainland Road, are already congested on a daily basis especially at rush hour. The impact of over 540 houses would be significant. Taking into account, most households have two cars, this would mean over 1000 more cars in this already congested area. This would mean increased traffic at the junctions of Saddleworth Road and Stainland Road, and Stainland Road and Rochdale Road. An increase of 105% and 100 % respectively according to the plan proposals. With this will come increased air pollution and potential increase danger to pedestrians based upon the increase in traffic on Saddleworth Road. Other side roads will be used as -"rat runs" i.e. Sunnybank Drive / Sunnybank Road to Rochdale Road and Brain Royd Lane to Rochdale Road when Saddleworth Road becomes too congested, which will be a daily occurrence if these houses were built. Schools ; A significant expansion of the Greetland Academy would be required to meet the new demand. Based upon the proposals the number of new pupils would be significant. I would suggest the main school site on School Street cannot be extended much more, which would impact on the Saddleworth Road annex. There is room for school expansion here, but parking is already an issue and would be significantly worse with school expansion. More housing means more children, means bigger schools on limited sites and means more parking issues in both areas. This also means an increased danger to children and residents through inconsiderate parking and driving and using Sunnybank Drive/Sunnybank Road and Brian Royd Lane as a cut through to both schools. Environmental / Flood plain issues ; Site LP 0177 is proposed on a flood plain area. On 9/2/20 the river again broken its bank and the fields are flooding again. Second time in at least 5 years! I have video footage of the significant flooding to this area. This is not a once in a lifetime occurrence, but a now regular occurrence. Site LP 0952 and site LP 1625 on the plans states that these proposed areas are subject to flooding from surface water. I simply cannot understand the logic behind proposals to build houses on

areas susceptible to regular flooding. Calderdale is one of the hilliest areas in Yorkshire, so why would there be a proposal to build new houses on a flood plain area and in areas susceptible to excessive surface water issues when there are many other areas within the District that are not susceptible to this and which are not on a flood plain? The cost of the previous flooding and the now recent floods will run into millions for the council and residents. Environmental Factors - Part of the development plan states that environmental protection is a major consideration. I would suggest that development on the scale proposed and in the three areas LP 0952, LP 0177 and LP 1625 would have a significant impact on the local environment and take away the local countryside from local residents. LP 0177 and LP 0952 are wildlife habitats with the latter also being an area of deciduous woodland. LP 0177 and LP 1635 are also archaeological sites of interest. Crime ; At the present time, the Greetland, West Vale and Stainland area is a safe area to live. Crime is relatively low compared to other areas within Calderdale. The addition of over 500 new houses is likely to increase in the local area, which at the present time is relatively low in Calderdale. Such significant developments would attract criminals, both local criminals and travelling criminals. Amenities - Doctors surgeries will be affected with the large increase in patients. Accepting this may expand, I believe that this will still be negative in impact and may not be able to expand to take the increase in people. The impact on local people would be negative. I believe that the surgery is excellent at present and you can access services if required. Other factors ; Green Belt and Housing developers interested ; I have read the rationale as to why some of the previous proposed sites have now been shelved for development. Of note, factors highlighted on most are that they are on green belt sites and that there are no proposed developers interested. Interesting. The proposals in this area are on green belt land and I suspect that money is a factor as to why these areas have yet again been brought back to the table. Greetland is a sought after area, hence the reason why developers would jump at the chance of building houses in this area (more profit), and the council will receive more revenue based upon the housing bands. I am not naive and nor are other people, but this is a concerning factor for myself and no doubt other residents. Is money a factor as to why these proposals have been reinstated, not benefit to the area?

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU860**

Site ref (if applicable): **LP0177**

Person ID: **960336**

Name: **Mrs Caroline Wood**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

the proposed site does not comply with many of the regulations set out in the NPPF

Do you consider the plan to be Sound?: **No**

Sound Reason:

Loss of Greenbelt, Building on a Flood plain, Ecological reasons, Air Pollution, Highways, Urban Sprawl, Infrastructure please see attached document

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

the proposed site is a Flood Plain, contains a Wildlife Corridor and UK BAP Priority Habitat

Suggested Modifications:

No modifications will make this legally compliant or a sound proposal, Leave it as 'most sensitive Green Belt parcel'

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5608873>

Comment ID **HRU870**

Site ref (if applicable): **LP0177**

Person ID: **1128728**

Name: **Mr Vladimir Murawa**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Calderdale have exhibited a complete lack of consultation prior to formulating and submitting their LP to the Inspector. The LP completely disregards NPPF Section 13 Protecting Green Belt Land Paragraph 80.

Do you consider the plan to be Sound?: **No**

Sound Reason:

The Local Plan is flawed in respect of the following;- Flooding Highways Ecology Open Space Historic Environment Employment Land Study Business and Economy Environmental Health Other factors Accessibility Green Belt Flooding Because of the many natural springs, together with the direct rainfall, the Saddleworth Road area is subject to flooding. Currently the Green Belt and it's trees south of Saddleworth Road absorb much of the excess water, but the lower fields are class 3 flood plains. If the areas south of Saddleworth Road have the massive development outlined in the Local Plan, filling the whole south side, the consequences for West Vale in terms of flooding are dire, as it will all flow down the valley, whatever drainage system might be planned. Calderdale is well aware of the effects of extreme weather in our area. Sewer Flooding The sewers that runs close in the Black Brook and down Saddleworth Road are already overloaded with combined sewer overflows (CSO) that discharge excess flows into the brook at time of rainfall. The proposed developments will more than double the number of houses connected to these sewer systems. These additional foul flows will almost double the flood volumes on the sewers and nearly double the annual spill volumes from the CSOs which will increase the pollution to the brook. This will have a negative impact on the fish and wildlife in the area. The Environment Agency have a no deterioration policy for CSOs but there are no plans to upgrade the sewer system in Greetland and West Vale to negate this impact. Highways Saddleworth Road carries a number of various speed restrictions along it's length. Varying from 20 mph to 50 mph. Traffic at peak times can often be stationary, and speeding within

the 30 mph zones is regularly observed. Fatalities and other serious accidents do occur in Saddleworth Road. The proposal for in excess of six hundred homes in Saddleworth Road, and the planned two cars per household, the additional traffic volume would be horrendous. Limited prospects for employment in the immediate area would mean that the two cars per new household would be travelling through Saddleworth Road at peak times to and from their places of work in either Leeds or Manchester, with no economic benefit to Calderdale. However the effects on the pollution level would be horrendous. Because the local schools would not have the capacity for a further one thousand (approximately) children, would this then mean additional travelling from Saddleworth Road to more distant schools? West Vale is currently a serious bottleneck. Whatever plan is devised to try to alleviate traffic congestion, roads from four directions converge into West Vale, and the massive development proposed will only create a far greater problem. Ecology I believe that the ecology of the area is reasonably - "balanced" The valley enjoys the presence of all manner of wildlife including herons, squirrels, foxes, and other wildlife, who share the area, to the benefit of residents. Open Space Open Space preservation is necessary for the following reasons; To continue to support farming, existing fauna and flora of the area. Allow locals and visitors to enjoy the open spaces, namely walkers, cyclist, horse riders, and many others. Open Spaces offer mental and physical wellbeing, dilute pollution, and allow vital recreation and exercise. Once Green Belt/Open Space is lost it can never be returned. Surely we do not wish to deprive the next generation of what little Open Space we have remaining. A great swathe of Saddleworth Road has already been over developed, particularly on the north side. The area has already had a disproportionate level of building for its size. To turn the whole valley into a housing estate would be a travesty. Efforts should be made to fulfil the housing requirements with brownfield development. The existing green belt should be allowed to remain. Historic Environment The changes to the local areas environment had changed dramatically, and some of the area's historic past has been eroded by the mass urbanisation in the area. We need to preserve what little remains. Employment Land Study The area of Greetland does not have any prospects for meaningful additional employment, meaning new residents would have to travel to places of employment, adding to traffic and pollution problems. Business and Economy Because the area is predominantly agricultural and domestic dwellings, the addition of massive housing development will not change the business prospects or economy of the area. Environmental Health One definition of Environmental Health is - "Environmental health is focused on the natural and built environments for the benefit of human health, whereas environmental protection is concerned with protecting the natural environment for the benefit of human health and the ecosystem" "... - "" ". Environmental health and environmental protection are very much related" The loss of Green Belt, Open Space together with the addition of possibly 2000 more domestic vehicles, to enable travel to places of employment, education, or social and pleasure, outside the immediate area, would certainly not make for a better protected environment. Other Factors Other factors I would ask to be considered are; I have found that Calderdale's publicity surrounding their Local Plan proposals to have been very limited, giving the appearance of an absence of complete openness. I do not believe the attempts at consultation with the community have adequate or thorough. Unlike the previous website comments procedure, I have found the website difficult to navigate much less reliable, making it difficult to register comments. Calderdale's Local Plan Position Paper reported that there is - "considerable public disquiet over the allocation of land for housing on the south side of Saddleworth Road this disquiet does not seem to be well targeted other than objections to Calderdale MBC" Calderdale has also received petitions from the residents of Greetland pointing out their dismay and objections to the initial Local Plan. Perhaps it might be prudent for the Council to review it's more current housing requirements, as a result of changes in national and international situations, together with a brownfield site in West Vale and other areas in Calderdale now becoming available for development. Because the same problems and arguments apply, I would like to add designated areas LP1625, LP0177, LP0026, and LP1407 to my objections. Considering all the areas designated in the current Local Plan for Saddleworth Road, together with the existing development over a long number of years, it would suggest that Saddleworth Road, Greetland appears to have been unreasonably discriminated against, when comparing the areas size for the vast amount of development. The development of brownfield sites should

be a priority according to the CPRE, there are more than enough brownfield sites to fulfil the requirements without encroaching into Green Belt. Accessibility Access to and from Saddleworth road is difficult. West Vale is a bottleneck, as roads from four directions merge. Stainland road from Saddleworth Road, meanders through some single track country roads, and at Ripponden comes out at a busy T junction. The road is well used by HGVs, servicing Bosch in the valley, Sonoco, and quarries. Bus services are very limited, with West Vale being the closest hub to regular bus services. Green Belt NPPF Section 13 Protecting Green Belt Land Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: 1) to check the unrestricted sprawl of large built-up areas (2) to prevent neighbouring towns merging into one another (3) to assist in safeguarding the countryside from encroachment (4) to preserve the setting and special character of historic towns (5) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Calderdale Council, in its own evidence, concludes that this area of Green Belt performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt. Esther McVey's (former Housing Minister up to Nov 2019) written policy on Green Belt land quotes: "protecting the Green Belt goes beyond protection against development" "The limited area of Green Belt remaining in Greetland should be retained because; Green Belt land has been removed from Local Plan proposals in other areas due to the ribbon effect. Because this is relevant to the land at the south side of Saddleworth Road, it should also be removed, otherwise it smacks of discrimination by Planning. On Calderdale's Local Plan in November 2016 the Green Belt survey for this area came out very strongly, and stated to be a "highly sensitive area" "It continues to be farmland for cattle, sheep, and horses. Helps to safeguard the countryside from encroachment and the merging of neighbouring towns. Helps to emphasise urban regeneration. Additional comments In regards to highways, education, transport and medical, the facilities are totally inadequate to be able to sustain any massive development. Much of the Green Belt in the Greetland area has already been consumed by housing development over the years, to a disproportionate degree. Work by CPRE suggests that there are enough brownfield sites in Yorkshire and Humberside to keep councils going for 89 years to meet their 5 year housing targets. It would appear that population growth is likely to be amended substantially downward in view of recent European events. The Local Authority should seriously look again at other possibilities. Alternative proposed use for this site. To remain as Green Belt and open space.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

The Green Belt at Saddleworth Road HX4 should be retained as Green Belt, and existing Brownfield sites planned for housing.

Comments:

Additional Evidence Link:

Comment ID **HRU879**

Site ref (if applicable): **LP0177**

Person ID: **1243517**

Name: **Mr Andrew Mandebura**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Calderdale Council have failed to make the residents aware of the need to submit new objections to the updated Local Plan and the timescales for this. Calderdale Council has a responsibility to rectify this and ensure this is done in a fair, open, honest and transparent way.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Infrastructure Section 4.18 of the Cabinet report of 14 October 2019 - "Potential modifications to the draft Local Plan following the receipt of the Planning Inspector's post-stage 1 hearings letter" quotes: - "Exceptional circumstances must be demonstrated to justify the release of land from the Green Belt. Furthermore careful consideration needs to be given to sites in the Green Belt to ensure that they support sustainable development. In this respect key considerations include the extent which the site would be accessible to existing public and active travel modes, and whether the development would be of sufficient scale to support the delivery of new infrastructure and comprehensive masterplanning." There is currently one bus service, the 343, operated hourly by Yorkshire Tiger which passes along Saddleworth Road and into West Vale. This is invariably a small single decker bus and does not provide a sufficient public transport solution in line with the proposals above. In addition, the current junction in West Vale between Saddleworth and Stainland roads does not adequately handle the current volume of traffic at peak times. This results in long waiting times which will only increase with an increase of additional housing. No changes to infrastructure in this regard have been proposed to handle the additional traffic and this junction will not benefit from the A629 development project. Therefore, I would assert that the neither does this plan support sustainable development or indicate comprehensive masterplanning. Finally, according to Council data on primary school admissions 60 places were allocated to new starters at The Greetland Academy in 2019/20. 33 of these were awarded on distance while 26 were awarded on the basis of siblings already at the school. If the planned admissions are also taken into account at Norland (15), West Vale (26) and Barkisland (30); this brings the total number of new primary school places within the range of the new development to 131. At this stage it has not been detailed how school infrastructure will be developed to cope with existing requirements in addition to the new development which will fall in this catchment area. Once again an indication of a lack of comprehensive masterplanning. As academies West Vale and Greetland are also not bound by the council to expand. Flooding The recent heavy rains brought by Storm Ciara and Storm Dennis have flooded the land proposed for development. Paragraph 149 of the National Planning Policy Framework 2019 states that - "Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk (p.46) and also states in paragraph 150 that new developments should - "avoid increased vulnerability to the range of impacts arising from climate change" The plans as detailed have no reference to the mitigation of flood risk which has shown to be a significant danger as they lie in an area assessed by the Environment Agency to be - "High Risk" Flooding areas - <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map?easting=408233&northing=421102> The removal of soil and land which absorbs water to be replaced by concrete and tarmac is likely to exacerbate this issue. Air Pollution As alluded to above. The increased congestion from possibly 1200 additional commuters will lead to a deterioration in the air quality. This will be compounded by the removal of trees for the development. In addition this decrease in air quality will be right next to a primary school housing young children causing health issues which are well documented such as asthma.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Given that the Section 110 of the Localism Act sets out the 'duty to co-operate' as sustainable development or use of land that would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of a county council requires that councils set out planning policies to address such issues requires that councils and public bodies 'engage constructively, actively and on an ongoing basis' to develop strategic policies requires councils to consider joint approaches to plan making requires that councils and public bodies 'engage constructively, actively and on an ongoing basis' to develop strategic policies I can see no demonstration of a 'duty to co-operate' as this plan does not take into account the issues of school places, traffic congestion and management, environmental issues around flooding and air pollution and their impact. I can see no evidence from the proposals that these have been considered. Also, the economic requirements for the plan have not been reviewed since 2018. During which time inflation has been increasing on average at 2% while wages have stagnated. The economic forecast is therefore outdated and does not represent an ongoing basis of strategic review.

Suggested Modifications:

1. A clear assesment of the impact of additional traffic on current infrastructure and the environment relating to air pollution and the cost of development required to keep traffic congestion at current levels.
2. A robust assesment of the danger of building on a flood plain categorised as high risk by the environment agency and the cost of development to safeguard against flooding.

Comments:

Additional Evidence Link:

Comment ID **HRU893**

Site ref (if applicable): **LP0177**

Person ID: **1242153**

Name: **Mrs Samantha Connett**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

No the proposal for the site LP1077 fails to acknowledge many planning guidelines/ advice given on environmental and social factors. Upon reading the national policy planning framework, I have found many points that contradict what the council is trying to enforce, the main one I believe is below. Proposals affecting the Green Belt Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are: a) buildings for agriculture and forestry; b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it; c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces; e) limited in filling in villages; f) limited

affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: " not have a greater impact on the openness of the Green Belt than the existing development; or " not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority. The council also failed to make the most affected people aware that these sites have been added back into the local plan when they were removed in 2017. Most people have only found out through social media and word of mouth, many residents who aren't on social media won't have found out about this.

Do you consider the plan to be Sound?: **No**

Sound Reason:

No Flooding -This site is completely unsuitable for development. It is well known for flooding as it naturally takes all the water that flows from the higher parts of Greetland as well as a large amount of unground springs, seen by myself a week after the floods from storm Ciara on 09/02/2020. The level of devastation caused by this storm in the Calder Valley is only going to become more frequent as we face the battle of climate change, to build houses on such volatile land is completely unthinkable, this is not a flood risk area, its a flood certainty. The houses on Woodfield grange that back on to this plot had flooding in their gardens over the storm Ciara. If this land was developed the results would be more devastating as well as further a field as the water usually soaked up by this land would be diverted to other parts of greetland, costing the government more money to clean up the mess when it is completely avoidable in the first place. Over thirty million pounds has so far been spent on flood defences in Calderdale, but as we face the threat from storm Dennis the Army had been called in to help protect us from flood water, but yet the council still wants to build on natural flood plains. Flooding cannot be mitigated against in this area. The land as it stands is helping to prevent further disaster, and must be left as it is to prevent further damage to or homes and community. To risk the homes and livelihoods of the community, when the community is so opposed to it is wrong as it is us who would suffer and end up having to pick up the pieces of our lives when, not if we're left with the repercussions of this development. The proposal does not meet national policy with regards to flooding. The NPPF states in paragraph 155 that "Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere". The recent floods we had on 09/02/2020 only strengthen my point. I will add evidence of the floods on this plot of land below. We are forever having interruption on our roads by the council having to do repairs on the water system, the water going into these as a result of the flood plain being destroyed would put even more pressure on this, leading to more roadworks and more road congestion. Clean Air Policy ; The sheer quantity of houses proposed on this site would mean far greater emissions and air pollution in west vale, on commutes to and from Halifax and beyond. Calderdale Council have declared a climate emergency, so how is it a justifiable decision to release greenbelt land with the intention to build a large amount of houses whilst destroying the natural benefits that the greenbelt brings. This site is also directly surrounding a preschool and the key stage 1 site of The Greetland Academy. Saddleworth Road is already a hugely congested road and that's before development of more houses that would use this road. From September 2020 I will have a child at each of these schools so I feel very passionate about how the children attending these schools will be directly affected from the decline in air quality around them for up to 7 hours a day (including school drop off and pick up). One reason why children are particularly vulnerable to the effects of air pollution is that they breathe more rapidly than adults and so absorb more pollutants. They also live closer to the ground, where some pollutants reach peak concentrations, at a time when their brains and bodies are still developing. These are the most precious people in our community and our future. The proposition that

this site allocation is where they spend most of their time seems highly unjustified when there are many other places in Calderdale more suited. The Green Belt - Loss of large area of Green Belt and Wildlife Corridor The NPPF states that When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused on these grounds alone this site should be removed from the local plan. The Wildlife Corridor has a well-used public footpath that travels the whole length of the proposed Local Plan build site, as well as this the area is home to wild deer, foxes, squirrels, field mice, barn owls, kingfisher and much more. The brook itself is a healthy natural water-course with a thriving population of wild brown trout. Taking away something so natural and therapeutic that benefits local people by getting in touch with nature and to get children out into open spaces should be the last resort and with so many brownfield sites still available I believe this goes against many of the policies on the NPPF. A report recently submitted to the Adult Health & Social Care Scrutiny Board stating the need to retain Green Spaces for the Health and Wellbeing of Calderdale residents. This report was submitted by the Head of Planning. (This report is on Calderdale MBC's Website) Infrastructure - the roads in and around Greetland are at breaking point on a good day, let alone when we have endless amounts of roadworks to contend with. the roads simply cannot take the proposed number of cars which all of these houses would bring with them. Both The Greetland Academy and West Vale Primary are full to capacity, as well as the feeder high school Brooksbank. Stainland Road Medical Centre would also struggle to attend to the additional patients this would bring with it, the local dentist has a 600 place waiting list for NHS patients. this amount of houses along with the other proposed developments along Saddleworth Road are unsustainable because of this. Paragraph 94 of the NPPF states that 'It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: 28 a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and b) work with schools, promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.' As far as parents and the local community are aware the school has not been consulted on the Local Plan. Perhaps because both schools are academies, they cannot be pushed to expand. This is not compliant with the NPPF as stated above. The Greetland Academy is already oversubscribed. There is simply no more school places available. 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 primary school. There is also a very real increased risk to the children of Greetland Academy and Sunnybank pre-school should the proposed development go ahead as the school and pre-school are on Saddleworth Road. This is already a very heavily congested road in Greetland with its own safety and air quality concerns as stated above. At school drop-off and pick-up times Saddleworth Road can be reduced to a single lane by the parked cars, usual passing traffic and a high number of HGV's. The proposed level of development would leave this road unsafe and due to the number of children on the roadside, this site is not suitable for Local Plan development, especially when we consider the risk to our young children from a lack of road safety.

Allocation of land - Greetland is a village. So why is it included in with Elland and Stainland in the local plan? Ripponden and Brighouse haven't been grouped. Stainland has also no land allocated in the local plan whilst Greetland has 4 sites amounting to an unsustainable amount whilst destroying out greenbelt. I believe this to be a deliberate attempt to mask the disproportionate quantity of building works being allocated to Greetland, this is an unsustainable amount for this village, put that together with them all on one road and it's unbelievable. LP0026, LP0177, LP0952 and LP1625 are all on Saddleworth Road. Greetland is a community in its own right and when shown the amount of planned build in this one small area it is unacceptable. Greetland is HX4 and a village whereas Elland is HX5 and a town, we shouldn't be grouped together. Urban Sprawl - can cause increased traffic, worsening air and drinking water, threats to groundwater supplies, high rates of polluted runoff and increased flooding. The flooding on 09/02/2020

shows we don't need anymore reason to chance risking more flooding in our area.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

There is no exceptional circumstances that justify destroying the greenbelt land when brownfield sites still remain untouched. It does not conform to Central Government Policy and does not conform with current legislation with regard to building in flood risk areas.

Suggested Modifications:

This amount of development is unsustainable for Greetland in every way possible, I find it hard to believe someone has put it together. It's also on Greenbelt. this is what it should remain for the future generations of Calderdale to enjoy. The sites LP0026, LP0177, LP0952 and LP1625 should be removed from the local plan

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5607546> ; <http://calderdale-consult.objective.co.uk/file/5606039> ; <http://calderdale-consult.objective.co.uk/file/5606028> ; <http://calderdale-consult.objective.co.uk/file/5606037>

Comment ID **HRU899**

Site ref (if applicable):

Person ID: **1243139**

Name: **Mrs Margaret Pollard**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Failure to consult sufficiently with the residents of Calderdale on the inclusion of these parcels of land within the plan. The plan has been in development since 2016, some 3 years, the inclusion of these parcels of land has been in within the last three months, this feels a very extremely disproportionate timescale.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Loss of Greenbelt The development of this site will not only lead to the loss of a greenfield site but also Greenbelt. Calderdale Council classified this area of the Greenbelt as being - "most sensitive Green Belt parcel" within the last local plan but is now willing to sacrifice it for future generations to build houses. The Council's website indicating that this site is most sensitive Green Belt, doesn't that mean it should be preserved at all cost? Paragraphs 145 of the NPPF states the local planning authority should regard the construction of new buildings as inappropriate in the Greenbelt with certain exceptions. I don't believe that the criteria set out for exceptions would be met meaning that development should not be allowed. The likely development which will take place on this land will be large 3 and 4 bed roomed executive development to satisfy the needs of those commuting to near by Manchester and Leeds, they will not satisfy the local needs nor would they meet the test of affordable. Paragraph 136 of the NPPF indicates

that the boundary of the Greenbelt should only be changed in exceptional circumstances. Does the development of this size meet the criteria of exceptional circumstance? What are the exceptional circumstances that would warrant the loss of most sensitive Greenbelt parcel that would cause loss of openness of the Greenbelt to the other residents of Greetland. The purpose of the Greenbelt is to preserve the countryside. We have a duty to our future generations to preserve the openness of our countryside as much as possible and therefore this site should be removed from the plan. Unfortunately, when it has gone there will be no way of replacing it, future generations will not be able to enjoy the abundance of wildlife, its openness and recreational activities as we have. In Richard Seaman's letter of the 18/10/19, he indicates that the Council's approach to meeting housing needs is to release Green Belt; however, this is tempered by placing a stronger emphasis on regeneration of brown field sites and increasing densities on such sites. He fails to indicate where these sites are and what they will do to ensure that this is completed first. I would question however if this is the stance, why the Council isn't approving a housing development on such a brownfield sites such as the one in the West Vale when a planning application has been made and removing this housing allocation from Green Belt within the proposed plan? Prior to the release of any Greenbelt the Council should engage in filling all unoccupied houses and releasing brownfield sites for housing development. Of course, I appreciate that these sites are more expensive to develop and what every developer wants is to build on a greenfield site, this should not however be at the expense of losing Greenbelt, we must protect it and preserve it for future generations. Infrastructure Local Road Network ; (Sites LP0177, LP1625, LP0952 and LP0026 should be considered together) Traffic from the site would generate considerable vehicle movements on Saddleworth Road into West Vale. The junction of Saddleworth Road/Stainland Road in West Vale is already heavily congested, the addition of any traffic movements from this site would only add to this congestion. The site summary indicates that mitigation measures will be required at this junction, shouldn't these mitigation measures be identified before the inclusion of the site within the plan? What if they can't be undertaken due to constraints at the junction? Paragraph 102 of the LPPF indicates that transport issues should be considered from the earliest stages of plan making, I therefore request that this be considered now and that if the junction is not capable of dealing with an additional 2000+ car movements per day that the site(s) be removed from the plan. The site reports a journey time of 15 mins to the nearest town, Elland. This was obviously done via Google Maps and wasn't undertaken at peak times when it can take up to half an hour to get through the above junction. Traffic can often be queuing up past the junior school on Saddleworth Road, any further additions to the volume of traffic will not only increase journey times but contribute to a lowering of air quality standards in the areas due to vehicle air pollution. Vehicle pollution is seen as one of the main contributors to respiratory ill health. Any increased journey times and /or congestion will mean that the narrow side roads will be used as "shortcuts". Due to increased ownership of cars and school run parking, these roads are often down to single track again causing congestion and danger to pedestrians and other road users. Additional volume of traffic will exacerbate this issue. It should also be noted that the current school is a split site and many parents travel between sites using cars, any increase on these movements would add to the already dangerous conditions. Local schools, doctors and dentists are currently oversubscribed, I would therefore question if all four sites within Greetland are developed how would these needs be fulfilled? Meeting the challenge of climate change and flooding Whilst I appreciate that this site is not within an identified flood risk area, I am concerned that the loss of open agricultural land and the replacement with roads, drive ways, hard standing and roof tops will contribute greater run off into the adjacent water courses, thereby increasing the speed of delivery and volume of water following rainfall in to these. Whilst this will not impact the site directly it will affect those downstream greatly. Boxing Day 2015 and over the weekend of 8 th /9 th February 2020, this area of Calderdale was subjected to substantial flooding. Properties in West Vale and Elland which are downstream of this development were affected. Calderdale has now been identified as a high-risk area for flooding and any loss of open land can only add to the risk identified. This parcel of land acts as a flood plain and therefore reduces the volume of water to downstream properties. One of the major contributors to the recent devastating floods has been the loss of these parcels of land to protect downstream

properties. The proposed plans drawn up by an interested developer for this parcel indicates that the flood plain would be utilised for housing, this would not only put those properties at risk but also increase the risk of more properties down stream being flooded. The Greetland hillside is riddled with springs and excessive ground water. It will be argued that this can be mitigated by adequate land drainage and SuDs however these schemes are costly and remove profitable land from any development and I would therefore question whether they would be undertaken. A recent development in Greetland of one single residential property has stopped water running in to a well that as run for the last 30 years to my knowledge and it now flows down the local roads, what would a development of this scale do? On a recent walk through these fields, standing water could be seen, removal of the parcel from greenfield to housing would remove these natural "sponges" from our environment and again add to the risk of flooding downstream.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

The economic growth calculation should be reconsidered

Comments:

Additional Evidence Link:

Comment ID **HRU900**

Site ref (if applicable): **LP0177**

Person ID: **1115722** Name: **Mr David Blagbrough** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Due to this area being a flood plane it should be removed from the plan

Do you consider the plan to be Sound?: **No**

Sound Reason:

The local school is at maximum capacity the G P surgery is at full capacity the road is not suited for any extra traffic it is in constant use with HGV wagons. The stream has flooded the field twice in four years so anymore building in this area can only increase pressure on West Vale if weather continues to carry on in this way. The wildlife will be destroyed there are deer, herons, raptors, owls, bats and kingfishers all 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/5609117>

Comment ID **HRU912**

Site ref (if applicable): **LP0177**

Person ID: **960006**

Name: **Mr Adrian Iredale**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Please refer to the attached word document (OBJ LP0177 AI) below which outlines our main points of objection.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Please refer to the attached word document (OBJ LP0177 AI) below which outlines our main points of objection.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Please refer to the attached word document (OBJ LP0177 AI) below which outlines our main points of objection.

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609271>

Comment ID **HRU917**

Site ref (if applicable): **LP0177**

Person ID: **1243675**

Name: **Mr Christopher WALLACE**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

1. Loss of GREENBELT and the wildlife corridor would have a major effect on the well being of the people who use it as part of their daily life and the important health benefits it brings. The established greenbelt should only be considered in exceptional circumstances as said by the current Government, this has not been taken into consideration in the local plan no register from the council is available at this current time

regarding brown belt sites. The government aim to protect greenbelt is of great importance and prevent urban sprawl. 2. The lack of INFRASTRUCTURE on Saddleworth Road and the surrounding area would have a major negative impact on the residents of Greetland and beyond. Increase volume of Traffic on roads that are already congested. The air quality would deteriorate beyond acceptable levels (no air test report has been produced or made public which Calderdale Council has a clean air policy) Nothing in the local plan for more child places in all local schools that are at capacity, has a consultation with the schools taken place or made public. The local plan has no regard for Doctors/Dentists intake capacity. The site is classed as a high risk flood area, the area is full of natural springs.. Global warming is on the increase and extremes of weather more an more common as seen in 2015 and more recently when severe flooding caused major disruption at exceptional costs to homeowners and business's along the Calder Valley. Development on any scale would without doubt increase the risk of more flooding downstream along the River Calder.

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 **HRU920**

Site ref (if applicable):

Person ID: **1243615** Name: **mrs SAMANTHA mcfadzean** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

1. There were no working party meetings ahead of the Councils Cabinet Meeting of 4th October 2019 at which the decision to increase the housing numbers was made. The local Councillours were therefore prevented from discussing the issues ahead of the cabinet meeting. 2. The local Plan does not address the implications of the National Planning Policy Framework, especially NPPF Para 177 and the associated PPG in the sustainability of Greenbelt Sites.

Do you consider the plan to be Sound?: **No**

Sound Reason:

The council has failed to differentiate between housing need and requirement as it has not evidenced its economic and employment growth forecasts. It appears that the plan has a grossly disproportionate emphasis on the Greetland community, with the 600 proposed houses off Saddleworth road. This is neither fair, reasonable or a balanced share to Greetland's size. The plan would create Urban Sprawl in our

area which would have many negative consequences for Residents, Local Businesses and the environment. Such as: Traffic - We already have a traffic congestion issue on Saddleworth Road, Rochdale Road and Stainland Road at key times, this plan would just exacerbate these problems. Air Pollution - the increase in traffic will lead to an increase in air pollution, particularly affecting the elderly and young children, the latter of which attend the infants school located on Saddleworth Road below the sites included in the Plan. The local School, GP and Dentist have no capacity to service the increased number of residents the Plan will create. There would need to be significant investment in Infrastructure however there is no provision in the Infrastructure Delivery Plan for the expansion of primary school places in Greetland and only an additional 75 secondary school places which is totally inconsistent with the NPPF guidelines. The council has failed to provide evidence as follows: Building houses on this plot would extend the built up area of Greetland and undermine the objectives of the Green Belt. It would also contribute to the extension of Greetland towards West Vale compromising Greetland as a Community, thus creating Urban Sprawl! Highways - The Council in its draft Infrastructure Delivery Plan it states 'There is no need to provide improvements to the West Vale junction.' I do not know how they have come to this conclusion. The current traffic problems encountered in this area cause a huge bottle neck of traffic at key times, the traffic lights are currently running at 117% and the maximum they should be running at is 93%! How can the plan to add 600 houses to Saddleworth Road not require improvements? Environmental Health - The Council claims it will mitigate against the environmental impact of increased Noise and Air Pollution but does not state how it will do this! High Flood Risk Green Belt - I do not want West Vale to become another Mytholmroyd!

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

I have significant concerns about the way in which the process of producing the Local Plan has been conducted. Not enough effort has been made to communicate the process of the Local Plan to residents and raise awareness of the consultation. The Greetland Pressure Group which was set up by the residents of Greetland to raise awareness of the Local Plan in our area have given us more consultation in the last 3 weeks than the Council themselves. Due to their efforts our area has been on Calendar and Look North focusing specifically on the flood problems these areas of green belt have incurred. The Council has not made it clear what they will do to make the Plan compliant.

Suggested Modifications:

Exclude LP0177 from the Local Plan

Comments:

Additional Evidence Link:

Comment ID **HRU924**

Site ref (if applicable): **LP0177**

Person ID: **1243202**

Name: **Mr Lee Roberts**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

There has been no consultation period at all with local people or the direct surrounding area.

Do you consider the plan to be Sound?: **No**

Sound Reason:

The land proposed for development is a natural floodplain which regularly floods on a yearly basis, during the boxing day floods in 2015 it flooded to biblical proportions, the local bridges were destroyed in that flood plus hundreds of homes and businesses were severely damaged, we were told it would only happen once in a life time, it happened again on 9th February during storm Ciara and it happened again a week later 16th February with storm Dennis, if it wasn't for this natural floodplain holding back millions of gallons of water which flows down the hillsides from Barkisland and upper Greetland heaven knows how much more damage and misery these floods would have caused, even our prime minister Boris Johnson as recently said flooding will be a common thing in the future he also said, and I quote, we should stop development on natural floodplains. INFRASTRUCTURE With 600 new homes will come in excess of 1000 plus new vehicles, the roads around West vale are already at breaking point, at peak times the traffic backs right up Stainland road, it stretches from the traffic lights all the way up Saddleworth road as far as Greetland academy, this road is very narrow, we have been living here just above Greetland academy for the past 30 years and had 3 cars written off in this time also the cars are badly damaged by wagons squeezing past other vehicles when there isn't room...the traffic also backs up from traffic lights in the opposite direction and regularly backs all the way up to the scissor junction and beyond into Elland, I would be very interested to know how calderdale council can sort that out . POLLUTION/AIR QUALITY There will also be a severe downgrade in air quality with all the pollution from a thousand plus new vehicles added to West vale/ Saddleworth road and surrounding areas, as mentioned above Greetland academy is on Saddleworth road, will this not be poisoning our young children, as this been considered for one moment. GREENBELT The proposed site for development is also a very valuable greenbelt/ wildlife corridor, we happen to share this wildlife corridor with a very rich diversity of wild animals including bats, which are a protected species, we also have woodpeckers, kingfishers, dippers, heron, fox, deer and owls which make their homes in the mature trees, this is also a very important area for the people of Greetland, West vale and beyond, it is where we walk, where we relax, where we come together as one with nature. DISPROPORTIANATE 600 new dwellings is also disproportionate amount for this small community, it will be a village within itself, West vale and Greetland would lose its identity and will just merge into the surrounding areas.

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/5609313>

Comment ID **HRU927**

Site ref (if applicable): **LP0177**

Person ID: **1243715**

Name: **Mr Timothy Wallace**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

LETTER OF OBJECTION TO PROPOSED HOUSING DEVELOPMENT IN GREETLAND: SITE REF: LP0026 LP0952 LP0177 & LP1625 LOSS OF GREENBELT The NPPF states that very specific circumstances need to be met, I do not believe any circumstances have been met to justify the release of greenbelt for development. The NPPF states brownfield sites need to be identified and the council must demonstrate it has examined all other option for developments prior to the release of greenbelt! The NPPF states that the greenbelt serves to restrict the urban sprawl and safeguard the countryside. The greenbelt woodlands and meadows serve the community for the urban population to enjoy and be part of their wellbeing, nationally obesity is on the increase and the greenbelt is a place for people to exercise, de stress free of charge. The greenbelt is the natural habitats for the varied wildlife in the area. FLOODING With the increased threat of climate change due to global warming it is 100% certain development on his site would increase the risk and requirement of flooding in the area and downstream of the Calder bringing more devastation and misery for the many residents and businesses along the way. The events of December 2015 and February 2020 area perfect example no amount of mitigation can compete with this, millions of pounds have been spent on the failed flood defence scheme and will only serve to divert the problem elsewhere. This area is classed as a high risk floor area and our current Prime minister has urged councils not to release flood plains for development. During the events of February 2020 the British Army were deployed to the Calder Valley to assist with the devastation cause by flood water. INFRASTRUCTURE/POLLUTION/CONGESTION The current road system would not support any increase if the predicted volume of traffic, Saddleworth Road and the traffic lights in West Vale have no room or plans to be altered. Developments of any scale would lead to further congestion and the certainty of increase of air and noise pollution; Calderdale council currently have a clean air policy action plan!! The local plan makes no provisions for child places in all local schools that are currently oversubscribed, this will lead to further congestion an air and noise pollution by been forced to travel out of the area. The schools and care homes along with the houses that boarder Saddleworth Road would be at a increase risk of poorer air quality. Any increase in volume of traffic would certainly increase the risk of accidents particularly around the school area for children, pedestrians and other road users. HOUSING REQUIRMENTS The Greetland area has a disproportionate allocation of land compared to other areas of Calderdale where development would be more suitable for the local plan, areas where the infrastructure is in place, no risk to flooding or causing increased flooding. The local plan needs to be updated and re assessed as to identify the action needed for development as the current plan is old and out of date. Economic ground for the area is not as predicted in the current plan. No plans are in place for business development. The current plan is unsustainable.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU930**

Site ref (if applicable): **LP017**

Person ID: **955837**

Name: **Mr David Hartley**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

The Local Plan does not address the implications of the National Planning Policy Framework, especially, NPPF Para 177 and the associated PPG in the Sustainability of Greenbelt Sites. According to the NPPF Para 143 under 'Proposals affecting the Green Belt' it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' The very special circumstances are non-existent in this site. This development would definitely contribute to future flooding in the area. The plans have in no way had any in-depth consideration and the impact on the infrastructure, environment and community will be devastating. One of the Greetland councillors - Marilyn Greenwood stated that she was not even told about the Planning Meeting when this plot was added!

Do you consider the plan to be Sound?: **No**

Sound Reason:

Points of Objections Air Pollution Flooding Infrastructure Wildlife Traffic Congestion Loss of Public Space
1 Air Pollution The severe increase in traffic (potential for 1200 additional cars which could equate to 2400 journeys each day) down an already congested Saddleworth Road. Already in peak periods the traffic backs up Saddleworth Road for at least ¼ mile with engines running! No air quality assessment has been undertaken in this area so we don't even know the extent of air pollution before the proposed development. Greetland Academy has the playground for nursery children right at the side of the road ; goodness knows how the proposed development will impact on these vulnerable, very young children which goes against the Government's strategy on air quality. 2 Flooding The area concerned floods at least once a year in varying degrees ; the worst instances have been Boxing Day 2015 and recently 9 th February 2020, the development will have a significant detrimental impact on flooding. The run off into Black Brook will cause serious downstream effects, for example, the floods of 9 th February saw Greetland Cricket Club, Heath Rugby Club and Clayhouse Park all underwater ; so it is hard to understand how any flood plan could mitigate against the risk of even more severe flooding in West Vale leading to major issues for all the businesses and residents. It is impossible to understand how the proposals in the local plan can be in any way aligned to the recent declaration by Calderdale Council of a climate emergency. These proposals will inevitably lead to a flooding emergency, probably not what the Council had in mind by its declaration. 3 Infrastructure The development has only one road in and out and all the residents would have to use their cars as the development is not on a regular bus route ; again going against Government Transport Policy. Local schools are oversubscribed meaning parents will have to use their cars to take children to schools out of the area. All doctors surgeries / Dentists are currently full and one is soon to close again impacting on the two remaining local ones. Other developments in the area have been mainly 3 and 4 bedroom houses (not affordable housing for local people). This type of housing attracts commuters who typically work in Leeds or Manchester and will, therefore, have to travel to the motorway via West Vale or Ripponden neither which can cope with traffic as it is today! 4 Wildlife The local wildlife will be decimated by any further development particularly birdlife such as Herons, Kestrels, Kingfishers which are seen very regularly flying around the area. 5 Traffic Congestion It is already extremely difficult to pass through the traffic lights at West Vale and the development will only add to the congestion both in West Vale and also Ripponden. 6 Loss of Public Space The area concerned is a very valuable green space for people of all ages to enjoy daily and is extremely popular with walkers, runners, etc. It is a really tranquil spot where people can get away from the stresses of life. It is also within walking distance of the local community and therefore

people do not have to drive to enjoy the countryside.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU932**

Site ref (if applicable): **LP0177**

Person ID: **1243724**

Name: **Miss Timothy Wallace**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

LETTER OF OBJECTION TO PROPOSED HOUSING DEVELOPMENT IN GREETLAND: SITE REF: LP0026 LP0952 LP0177 & LP1625 LOSS OF GREENBELT The NPPF states that very specific circumstances need to be met, I do not believe any circumstances have been met to justify the release of greenbelt for development. The NPPF states brownfield sites need to be identified and the council must demonstrate it has examined all other option for developments prior to the release of greenbelt! The NPPF states that the greenbelt serves to restrict the urban sprawl and safeguard the countryside. The greenbelt woodlands and meadows serve the community for the urban population to enjoy and be part of their wellbeing, nationally obesity is on the increase and the greenbelt is a place for people to exercise, de stress free of charge. The greenbelt is the natural habitats for the varied wildlife in the area. FLOODING With the increased threat of climate change due to global warming it is 100% certain development on his site would increase the risk and requirement of flooding in the area and downstream of the Calder bringing more devastation and misery for the many residents and businesses along the way. The events of December 2015 and February 2020 area perfect example no amount of mitigation can compete with this, millions of pounds have been spent on the failed flood defence scheme and will only serve to divert the problem elsewhere. This area is classed as a high risk floor area and our current Prime minister has urged councils not to release flood plains for development. During the events of February 2020 the British Army were deployed to the Calder Valley to assist with the devastation cause by flood water. INFRASTRUCTURE/POLLUTION/CONGESTION The current road system would not support any increase if the predicted volume of traffic, Saddleworth Road and the traffic lights in West Vale have no room or plans to be altered. Developments of any scale would lead to further congestion and the certainty of increase of air and noise pollution; Calderdale council currently have a clean air policy action plan!! The local plan makes no provisions for child places in all local schools that are currently oversubscribed, this will lead to further congestion an air and noise pollution by been forced to travel out of the area. The schools and care homes along with the houses that boarder Saddleworth Road would be at a increase risk of poorer air quality. Any increase in volume of traffic would certainly increase the risk of accidents particularly around the school area for children, pedestrians and other road users. HOUSING REQUIRMENTS The Greetland area has a disproportionate allocation of land compared to other areas of Calderdale where development would be more suitable for the local plan, areas where the infrastructure is in place, no risk to flooding or causing increased flooding. The local plan

needs to be updated and re assessed as to identify the action needed for development as the current plan is old and out of date. Economic ground for the area is not as predicted in the current plan. No plans are in place for business development. The current plan is unsustainable.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU938**

Site ref (if applicable): **LP0177**

Person ID: **1243732**

Name: **mrs Kathryn Sutcliffe**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

I don't believe building on 'flood plains' can be classed as legal full stop! Please refer to Calderdale's Statement of Community Involvement, which has not been followed in this process. CMBC have already stated "These sites lies within the approved Green Belt. The proposed development does not meet the exceptions, as it does not preserve openness and conflicts with the purpose of including land in the Green Belt. As such, it represents inappropriate development in the Green Belt, which is, by definition, harmful. No very special circumstances have been demonstrated to clearly outweigh the harm caused by the development. It is therefore considered that the proposal would be contrary to NPPF Chapter 13 (Protecting Green Belt Land)"

Do you consider the plan to be Sound?: **No**

Sound Reason:

LP0026, LP0177, LP0952 and LP1625 are so close in proximity that they should be viewed jointly as well as individually. They are all in the Greetland ward so why have they been recorded on this plan as Elland. Main points of objection 1: Flooding 2: Loss of green belt and impact on wildlife corridor 3: Air Pollution and Traffic 4: Infrastructure 5: Urban sprawl Flooding We have seen first-hand the devastation caused by the recent floods (Boxing Day 2015 and 8 th -9 th February 2020). Every proposed site flooded. The upland sites LP0026, LP0952 and LP0952 were rivers, the land already saturated by the vast amounts of natural springs this area has. The lower level part of LP0177 was indistinguishable from the river. The flood plains that these sites provide are critical and flood regularly ; soaking up excess water at times of rainfall, allowing space for the water to flow and be stored on open land in times of flood, even after the river has burst its bank, and protecting land further downstream from potential flooding. The development of this

land will increase flood risk further downstream towards Westvale, Elland and Brighouse (Evidence of which can already be seen on Social media sites, Calendar and national news outlets). To develop on these sites would contradict the DEFRA plan and the NPPF. The DEFRA 25year plan states that "National flood management involves the use of a variety of measures including storing water on open land". NPPF 14 (157b) states that plans should work to safeguard land from development that is required or likely to be required for current and future flood management. The current policy and legislation on flooding states - "due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere. Chapter 14, paragraph 163 of the NPPF states: - " When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere It is abundantly clear that any development on these sites would directly oppose all these pieces of legislation and policies and would hugely increase the risk of flooding to both surrounding properties and the wider community in Greetland, West Vale and even as far as Elland. Any development of these sites and reduction in the capacity of these flood plains will only ensure that the flooding we now see will be more frequent and cause even more damage. This is not acceptable or fair therefore these sites should be removed from the local plan. Loss of Green Belt and Wildlife Corridor Calderdale's Green Belt Review map of 2020 clearly shows that all proposed sites in the Greetland ward are 'Most Sensitive Green Belt Parcels'! Does this mean the council disregards its own statements? Esther McVey, our current Housing Minister's written policy on Green Belt land states "protecting the Green Belt goes beyond protection against development" NPPF chapter 13 states that there are 5 purposes to green belt land- CMBC has already stated that this land strongly fulfils these 5 purposes. NPPF ch13 paragraph 143 states "Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances". Protecting the green belt is very important. To include these sites in the local plan goes against all the above policies and there is no evidence of any special circumstances to support development on this land. The sites are a wildlife habitat for many different species. CMBC has already stated that a constraint is that Black Brook running through LP0177 is a UK BAP priority habitat. NPPF Chapter 15 states that planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes and sites of biodiversity. It also states - to protect and enhance biodiversity and geodiversity, plans should: identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including wildlife corridors. Developing these sites will put this precious wildlife corridor and all its inhabitants at great risk directly opposing the NPPF legislation and the DEFRA 25 Year Plan. This site should therefore be removed from the local plan Air Pollution and Traffic Congestion Air pollution and traffic congestion obviously go hand in hand. The junction of Saddleworth Road and Stainland Road in West Vale is already a bottle neck and far too congested and unable to cope with the traffic volume that passes through it on a daily basis. WSP Parsons Brinckerhoff Report on this Transport Network identifies that traffic congestion at the juncture of Stainland Road-Saddleworth Road would increase by approximately 105% traffic congestion at the juncture of Stainland Road-Rochdale Road would increase by over 100% Public Health England (PHE) (11th March 2019) reports that air pollution is the biggest environmental threat to health in the UK, with between 28,000 and 36,000 deaths a year attributed to long-term exposure. There is strong evidence that air pollution causes the development of coronary heart disease, stroke, respiratory disease and lung cancer, and exacerbates asthma. Professor Paul Cosford, Director of Health Protection and Medical Director at PHE, said: "Now is our opportunity to create a clean air generation of children Key interventions local authorities can take include redesigning cities so people aren't so close to highly polluting roads." Professor Cosford said: We recommend that at a local level, any new policy or programme of work which affects air pollution should aim to deliver an overall benefit to the public's health. Greetland School and Sunnybank Pre School are right on Saddleworth Road at the boundary of LP0177. The increase in traffic of over 100% and therefore pollution, that will be an outcome of development on this site ignores all the recommendations of PHE and put many people's health at risk especially that of our children which is totally unacceptable. Infrastructure Greetland Primary Academy,

West Vale Primary School and Brooksbank High School are all full. With a proposed 600 houses, using Calderdale MBC's figure for school places of .36 per household (IDP section 9.14) this indicates another 206 school places would be needed. Where are these places to be found? Local Dentist has a waiting list of 600 for NHS places. The nearest NHS dentist was recently found (July 2019) 11 miles away in Kirklees. Local GP surgeries are already full. No plans have been put in place to cope with the expected population rise. Waiting times can already go beyond seven days and GP's are already pushed to 'breaking point'. Urban Sprawl The following is from Calderdale Councils website regarding green belt land and urban sprawl: 'Green Belt - The functions of the Green Belt are to: check the unrestricted sprawl of large built-up areas; prevent neighbouring towns from merging into one another; assist in safeguarding the countryside from encroachment; preserve the setting and special character of historic towns; and assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. At what point do you stop building and filling in the gaps?

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Under the Localism Act 2011, Section 33A "Duty to co-operate in relation to planning of sustainable development", Paragraph 3 lays out the duties required of the local council of which points a and b require preparation of local plans. Point d however calls for "activities that can reasonably be considered to prepare the way for activities within any of paragraphs (a) to (c) I question if Calderdale has sufficiently carried out all all activities needed to form a sustainable local plan with specific reference to show that release of Green Belt in LP26, LP177, LP952 and LP1625 meets exceptional circumstances?: - i.e. has all brownfield been explored as per NPPF paragraph 137? Has land recently regraded to brownfield on LP177 at the end of Ellistones Lane, and pending vacation of the Freundenberg factory now up for sale) been considered? It is CPRE's view after meeting local residents that they consider these brownfield sites broadly positive. - I also question if there has been adequate exploration of infrastructure requirements and mitigation for a 33.8% growth in a community? -The council has provided a Sustainability Appraisal Report. However, under preferredOption 4, 9 of the 17 objectives analysed have been marked as - "uncertain" Impact. I question how fully the necessary 'activities' needed to form a sustainable plan have been carried out? e.g. risk assessment and necessary mitigation. How can a plan be sustainable and Green Belt destroyed when there are so many question marks?

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609511>

Comment ID **HRU942**

Site ref (if applicable): **LP0177**

Person ID: **1243746** Name: **Mr Samuel Sutcliffe** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

There are so many constraints and negatives to all these sites that cannot be adequately mitigated against. To develop these sites opposes so many policies, recommendations and pieces of legislation which CMBC

appear to have given little or no consideration to. I respectfully ask that these sites are removed from the Local Plan. They should never have been included as they are completely unsuitable for numerous reasons.

Do you consider the plan to be Sound?: **No**

Sound Reason:

LP0026, LP0177, LP0952 and LP1625 are so close in proximity that they should be viewed jointly as well as individually. They are all in the Greetland ward so why have they been recorded on this plan as Elland. Main points of objection 1: Flooding 2: Loss of green belt and impact on wildlife corridor 3: Air Pollution and Traffic 4: Infrastructure 5: Urban sprawl Flooding We have seen first-hand the devastation caused by the recent floods (Boxing Day 2015 and 8 th -9 th February 2020). Every proposed site flooded. The upland sites LP0026, LP0952 and LP0952 were rivers, the land already saturated by the vast amounts of natural springs this area has. The lower level part of LP0177 was indistinguishable from the river. The flood plains that these sites provide are critical and flood regularly ; soaking up excess water at times of rainfall, allowing space for the water to flow and be stored on open land in times of flood, even after the river has burst its bank, and protecting land further downstream from potential flooding. The development of this land will increase flood risk further downstream towards Westvale, Elland and Brighouse (Evidence of which can already be seen on Social media sites, Calendar and national news outlets). To develop on these sites would contradict the DEFRA plan and the NPPF. The DEFRA 25year plan states that "National flood management involves the use of a variety of measures including storing water on open land". NPPF 14 (157b) states that plans should work to safeguard land from development that is required or likely to be required for current and future flood management. The current policy and legislation on flooding states - "due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere. Chapter 14, paragraph 163 of the NPPF states: -" When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere It is abundantly clear that any development on these sites would directly oppose all these pieces of legislation and policies and would hugely increase the risk of flooding to both surrounding properties and the wider community in Greetland, West Vale and even as far as Elland. Any development of these sites and reduction in the capacity of these flood plains will only ensure that the flooding we now see will be more frequent and cause even more damage. This is not acceptable or fair therefore these sites should be removed from the local plan. Loss of Green Belt and Wildlife Corridor Calderdale's Green Belt Review map of 2020 clearly shows that all proposed sites in the Greetland ward are 'Most Sensitive Green Belt Parcels'! Does this mean the council disregards its own statements? Esther McVey, our current Housing Minister's written policy on Green Belt land states "protecting the Green Belt goes beyond protection against development" NPPF chapter 13 states that there are 5 purposes to green belt land- CMBC has already stated that this land strongly fulfils these 5 purposes. NPPF ch13 paragraph 143 states "Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances". Protecting the green belt is very important. To include these sites in the local plan goes against all the above policies and there is no evidence of any special circumstances to support development on this land. The sites are a wildlife habitat for many different species. CMBC has already stated that a constraint is that Black Brook running through LP0177 is a UK BAP priority habitat. NPPF Chapter 15 states that planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes and sites of biodiversity. It also states - to protect and enhance biodiversity and geodiversity, plans should: identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including wildlife corridors. Developing these sites will put this precious wildlife corridor and all its inhabitants at great risk directly opposing the NPPF legislation and the DEFRA 25 Year Plan. This site should therefore be removed from the local plan Air Pollution and Traffic Congestion Air pollution and

traffic congestion obviously go hand in hand. The junction of Saddleworth Road and Stainland Road in West Vale is already a bottle neck and far too congested and unable to cope with the traffic volume that passes through it on a daily basis. WSP Parsons Brinckerhoff Report on this Transport Network identifies that traffic congestion at the juncture of Stainland Road-Saddleworth Road would increase by approximately 105% traffic congestion at the juncture of Stainland Road-Rochdale Road would increase by over 100% Public Health England (PHE) (11th March 2019) reports that air pollution is the biggest environmental threat to health in the UK, with between 28,000 and 36,000 deaths a year attributed to long-term exposure. There is strong evidence that air pollution causes the development of coronary heart disease, stroke, respiratory disease and lung cancer, and exacerbates asthma. Professor Paul Cosford, Director of Health Protection and Medical Director at PHE, said: "Now is our opportunity to create a clean air generation of children Key interventions local authorities can take include redesigning cities so people aren't so close to highly polluting roads." Professor Cosford said: We recommend that at a local level, any new policy or programme of work which affects air pollution should aim to deliver an overall benefit to the public's health. Greetland School and Sunnybank Pre School are right on Saddleworth Road at the boundary of LP0177. The increase in traffic of over 100% and therefore pollution, that will be an outcome of development on this site ignores all the recommendations of PHE and put many people's health at risk especially that of our children which is totally unacceptable. Infrastructure Greetland Primary Academy, West Vale Primary School and Brooksbank High School are all full. With a proposed 600 houses, using Calderdale MBC's figure for school places of .36 per household (IDP section 9.14) this indicates another 206 school places would be needed. Where are these places to be found? Local Dentist has a waiting list of 600 for NHS places. The nearest NHS dentist was recently found (July 2019) 11 miles away in Kirklees. Local GP surgeries are already full. No plans have been put in place to cope with the expected population rise. Waiting times can already go beyond seven days and GP's are already pushed to 'breaking point'. Urban Sprawl The following is from Calderdale Council's website regarding green belt land and urban sprawl: 'Green Belt - The functions of the Green Belt are to: check the unrestricted sprawl of large built-up areas; prevent neighbouring towns from merging into one another; assist in safeguarding the countryside from encroachment; preserve the setting and special character of historic towns; and assist in urban regeneration, by encouraging the recycling of derelict and other urban land'.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

LP0026, LP0177, LP0952 and LP1625 are so close in proximity that they should be viewed jointly as well as individually. They are all in the Greetland ward so why have they been recorded on this plan as Elland. Main points of objection 1: Flooding 2: Loss of green belt and impact on wildlife corridor 3: Air Pollution and Traffic 4: Infrastructure 5: Urban sprawl Flooding We have seen first-hand the devastation caused by the recent floods (Boxing Day 2015 and 8th -9th February 2020). Every proposed site flooded. The upland sites LP0026, LP0952 and LP0952 were rivers, the land already saturated by the vast amounts of natural springs this area has. The lower level part of LP0177 was indistinguishable from the river. The flood plains that these sites provide are critical and flood regularly ; soaking up excess water at times of rainfall, allowing space for the water to flow and be stored on open land in times of flood, even after the river has burst its bank, and protecting land further downstream from potential flooding. The development of this land will increase flood risk further downstream towards Westvale, Elland and Brighouse (Evidence of which can already be seen on Social media sites, Calendar and national news outlets). To develop on these sites would contradict the DEFRA plan and the NPPF. The DEFRA 25year plan states that "National flood management involves the use of a variety of measures including storing water on open land". NPPF 14 (157b) states that plans should work to safeguard land from development that is required or likely to be required for current and future flood management. The current policy and legislation on flooding states - "due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and

when it does not increase the risk of flooding in the development's community or elsewhere. Chapter 14, paragraph 163 of the NPPF states: -“ When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. It is abundantly clear that any development on these sites would directly oppose all these pieces of legislation and policies and would hugely increase the risk of flooding to both surrounding properties and the wider community in Greetland, West Vale and even as far as Elland. Any development of these sites and reduction in the capacity of these flood plains will only ensure that the flooding we now see will be more frequent and cause even more damage. This is not acceptable or fair therefore these sites should be removed from the local plan. Loss of Green Belt and Wildlife Corridor Calderdale's Green Belt Review map of 2020 clearly shows that all proposed sites in the Greetland ward are 'Most Sensitive Green Belt Parcels'! Does this mean the council disregards its own statements? Esther McVey, our current Housing Minister's written policy on Green Belt land states "protecting the Green Belt goes beyond protection against development" NPPF chapter 13 states that there are 5 purposes to green belt land- CMBC has already stated that this land strongly fulfils these 5 purposes. NPPF ch13 paragraph 143 states "Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances". Protecting the green belt is very important. To include these sites in the local plan goes against all the above policies and there is no evidence of any special circumstances to support development on this land. The sites are a wildlife habitat for many different species. 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The junction of Saddleworth Road and Stainland Road in West Vale is already a bottle neck and far too congested and unable to cope with the traffic volume that passes through it on a daily basis. WSP Parsons Brinckerhoff Report on this Transport Network identifies that traffic congestion at the juncture of Stainland Road-Saddleworth Road would increase by approximately 105% traffic congestion at the juncture of Stainland Road-Rochdale Road would increase by over 100% Public Health England (PHE) (11th March 2019) reports that air pollution is the biggest environmental threat to health in the UK, with between 28,000 and 36,000 deaths a year attributed to long-term exposure. There is strong evidence that air pollution causes the development of coronary heart disease, stroke, respiratory disease and lung cancer, and exacerbates asthma. 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prevent neighbouring towns from merging into one another; assist in safeguarding the countryside from encroachment; preserve the setting and special character of historic towns; and assist in urban regeneration, by encouraging the recycling of derelict and other urban land'.

Suggested Modifications:

All these sites should be removed from Calderdale plans and be replaced with potential brown field sites in accordance with government policy.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609546>

Comment ID **HRU947**

Site ref (if applicable): **LP0177**

Person ID: **1243763**

Name: **Miss Gillian Reid**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Having lived in Greetland since birth (now aged 36) I have seen many changes in our village over the years. None of which I have ever felt compelled to write an official objection to up until now. After seeing the plans LP0177 (Land adjacent Ellistones Place) I am shocked to hear along with other plans LPO952, LPO026 AND LP1625 the enormous amount of building work being planned for such a small, beautiful village. If these plans are to proceed, I feel our local area will become completely unrecognisable as the small and beautiful village we once were. Please find below the reasonings behind my strong objections to this. The reasons are vast so for ease I have split the factors into the following categories: 1.Environmental 2.Economic 3.Social Environmental The plans for LP0177 along with LP0952, LP0026 and LP1625 all cover our valuable Greenbelt land in Greetland. This land is classified as a 'most sensitive' greenbelt, please find evidence of this in the following link to the Councils Greenbelt Review:

https://calderdale.gov.uk/v2/maps/green-belt-review?fbclid=IwAR0-YtEHRsU5_gSN2JMA4zPU97P0GPsWU0_lq263NGHjCx4_m66ibHv8vaQ

I simply can not see how the amount of proposed building work (600 homes through the 4 aforementioned sites) can possibly be justified on this beautiful Greenbelt land. This land provides a wildlife corridor, contains a public right of way and reduces the flood potential of not only our own local area but for those downstream of us and is meant to include prevention of urban sprawl. To build on this land will destroy all of these benefits this Greenbelt area offers to both the wildlife and the local community. The Department for Environment, Food and Rural Affairs' (DEFRA) 25-year plan states ' we will protect ancient woodlands and grasslands, high flood risk areas and our best agricultural land' . To build on this site would go be going directly against this statement. There is plenty of wildlife to be seen in and around LP0177, this plan would take away their natural habitat which is crucial to their survival, how can we justify taking away these species homes when we have already taken so much from them and are not doing enough with the land we have already taken. In June 2016 The CMBC published their Local Risk Management Strategy. This document states -"It is the local flood risk management strategy's main objectives to take steps to reduce flood risks in Calderdale"

One of the ways they proposed to do this was to -“develop a land management strategy that will potentially reduce upland runoff” The proposed building on any of the Greenbelt land will only exacerbate any runoff and flooding on lower lying land and further down the valley i.e. West Vale and Elland. We only have to look at our surrounding areas and effects that floods have on them. For example, Sowerby Bridge and Hebden Bridge. I fear that this development will cause similar tragic situations where businesses and homes of local residence are ruined with the clean-up/prevention bill costing millions. Why would we want to add to this problem when we are working so hard to find solutions to it in other local communities. Our natural land is already preventing this from becoming a problem for many, why not let this continue? Storm Ciara struck Calderdale with further flooding on 09/02/20 flooding many of the same places as Boxing Day 2015, this is evidence that the area floods more frequently than 'once a century'. The flood plains in this area did their job by decelerating the flow of water down the valley, I dread to think of the outcomes had this land been built on at the time. The CMBC Flood strategy was born following the Boxing Day floods of 2015. Calderdale was the worst affected borough in the UK. Greetland saw localised flooding all along the flood plain (sites LP0952 and LP0177) and the Black Brook. The houses on Woodfield Drive were affected. Multiple sites in West Vale were affected and further downstream the Elland Bridge collapsed and with that a massive £4 million repair bill. Building on our Greenbelt land will only lead to worse flash flooding as this land helps slow the flow of water to the main watercourses. Current legislation on building on flood risk areas can be found here: <http://www.environmentlaw.org.uk/rte.asp?id=105> This contains the following quote 'new development in the flood risk areas would only be allowed when it is exceptionally necessary' I find it very hard to believe it to be 'exceptionally necessary' to build 600 homes in this space when there are plenty of other areas of either brownfield or less sensitive to flooding which can be considered first. A quick look at the website Right Move will show you there are approx. 600 homes for sale within a 3-mile radius of these sites. Whilst these homes are available for anyone wishing to move to the area why is it 'exceptionally necessary' that we build 600 more? To me this only indicates that the demand for houses in this area may not be as high as perceived by CMBC and therefore we do not need to develop on any more of our precious land. Economic As of 31/01/20 the UK is in a Brexit transition period, leaving us with uncertainty for our future economic prospects. The plans for LP0177 and the other 3 mentioned sites have been proposed prior to Brexit and the forecast on population growth rates. This means the plans are already out of date as until this transition period is complete and we know more about our relationship with Europe and the rest of world how can we know how many new homes we may or may not see a need for? Would it not be better to put these plans on hold until we know the outcomes and needs, instead of building for the sake of building? The current roads around Greetland already struggle with the amount of traffic seen through the village and into the already chronic traffic issues of Westvale. Adding a further 600 homes to this already growing problem is only going to make matters worse. I can't even begin to imagine what another potential 600+ cars going through west vale would look like, other than just a complete standstill. The daily struggle to get in and out of Greetland especially at peak times will only be added to. At peak times of school drop off and pick up Saddleworth Road already becomes an absolute nightmare, I'm not sure how the road would physically cope with even more children needing access this school site. The number of vehicles in the road space along with the terrible parking that often occurs around school pick up zones is already an accident waiting to happen, do we really need to add to the danger by adding even more people to the mix? Also, with the added traffic spending much more time standing still with lengthy delays this will all contribute to poor air quality especially around our schools. Is this really what we think will be best for our local children? The area already struggles with the condition of the local roads with the current level of traffic. Why are we not addressing these problems before adding to them? If the council's budget for road maintenance can not stretch to repairing the damage by the current level of traffic where is the sense in adding a further 600+ cars to the road? With a lack of capacity for NHS dentists in the area, adding a further 600 homes is only going to increase the number of people with poor oral health due to lack of local availability. There will also be a strain on the local GP surgeries where it is already difficult to get an appointment for many. Social This greenbelt land gives people chance to enjoy nature whilst contributing to both their physical and mental wellbeing. Surely

taking away part of these stunning surroundings will have a negative impact on the health and quality of life of those who enjoy it regularly. The air will be more polluted, stress and anxiety levels will increase due to fear of further flooding, and there will be an increase in hospital admissions due to insufficient numbers of GP appointments.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU952**

Site ref (if applicable): **LP0177**

Person ID: **1243573** Name: **Mr Dale Crystal** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Firstly I find it surprising and irritating that the proposed Greetland and West Vales sites are referred to as Elland. That aside I find the lack of adequate consultation totally unacceptable and at odds with most government guidelines. 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:

Flooding Black Brook already floods on a regular basis and as you are no doubt aware has done so twice in the last month. The plan to build a large number of houses below Saddleworth Road and above Black Brook is going to significantly increase the run-off and flooding along the valley. No detailed flood prevention planning is included in the proposals. To build several hundred houses as planned and at the same time contribute to destroying unknown numbers downstream seems farcical. Highway infrastructure. This has been discussed by many people and you only have to drive through West Vale to see how congested and badly planned the area is. The major junction of Saddleworth road at West Vale is at best chaotic and at it's worst very dangerous. Allowing access points to 2 mini supermarkets virtually in the 4 way junction was a planning disaster in the first place. Further traffic needs to be avoided at all costs to stop West Vale becoming gridlocked and environmental health nightmare. Greenbelt & Wildlife corridor 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, with or without canines or kids. Flooding This is a major concern to me personally as we have had several experiences of Black Brook turning in to a raging torrent. The potential for increased flooding is hardly touched upon in the various reports and no adequate detail is given regarding prevention. Environmental Health The impact on the local environment is very concerning, especially

around the school. This sits directly on Saddleworth Road serving the very youngest and most vulnerable of our citizens. The health issues from such an increase in traffic pollution is of great concern. I would ask the council to seriously reconsider these plans and change the focus to use of brown field sites of which there are several available, including in West Vale.

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. The web site is not the easiest to navigate and use for a lot of people.

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/5609610>

Comment ID **HRU958**

Site ref (if applicable): **LP0177**

Person ID: **1243806**

Name: **mr andrew jackson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609641>

Comment ID **HRU965**

Site ref (if applicable): **LP0177**

Person ID: **1243811**

Name: **Miss louise Iredale**

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:

Main points of objection to the development of site LP0177 (in conjunction with LP0026, LP0952, LP1625): Flooding and the impact of climate change Greenbelt, habitats and biodiversity Air Pollution and traffic congestion Impact on local services Flooding and the impact of climate change -“ 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 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 12.02.2020 This quote was taken from a national newspaper only last week. In addition, Labour Council leader, Tim Swift, ' urged 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 . ' These development sites would result in 600 new homes being built on high flood risk areas, in close proximity to other high risk flood areas in the Calder Valley. The devastation that the Calder Valley has been subjected to due to flooding, particularly over the last 5 years, has been well documented and reported in parliament. The Land put forward for this development plan is not fit for purpose due to high risk of flooding. Please see the attached photographs of the flooding in our immediate area and home. The Black Brook has risen above our flood defences and entered our property on 3 occasions in the last 5 years. Our housing estate and home is at a direct risk of increased flooding should the developments take place and the flood protection that we have in place is not capable of coping. We are already considering extra flood defences and security to cope with the current flooding levels. Just last weekend, our property flooded as the Black Brook rose 12 feet in a few hours. The flooding in this location is a certainty, the fields proposed for these developments currently act as flood plains diverting the very worst of the damage that could be caused to the local area. The fields are unpassable for periods of time each winter. Climate change will only add to this situation as the planet warms up and we experience more rainfall year upon year. It is my understanding that the government is serious about supporting climate change initiatives. 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.' To build on this land would have catastrophic and irreversible ramifications, and not just for the immediate area, but for the areas further downstream. West Vale, Elland, Brighouse, Sowerby Bridge, Mythomroyd, Hebden Bridge are all effected by the River Calder when it floods. The economic consequences in the form of destroyed infrastructure, homes and businesses are catastrophic for local residents and beyond. Greenbelt, Habitats and biodiversity If successful, the proposed developments would destroy a beautiful, scenic area that many people enjoy with their families and in our case, two dogs. Areas like this are vital for people and families to exercise, enjoy nature and recharge. Mental health professionals have highlighted the therapeutic benefits of nature as a solution to stress, anxiety and depression, this is well documented and evidenced. Improving the mental health of all individuals in society is a key government strategy. This land is classified as highly sensitive Green Belt, it is a designated wildlife corridor and home to many protected species. As a resident who walks on a daily basis, I have personally spotted and heard: Bats, Barn Owls, Tawny Owls, Kingfishers, Hedgehogs, Badgers, Green Woodpeckers, Spotted Woodpeckers, Herons and dippers. We are also lucky to have a stock of Brown Trout, classified as a Priority Species in the UK Biodiversity Action Plan. This development is in direct conflict with the NPPF policy for conserving and enhancing the natural environment, protecting greenbelt and promoting healthy and safe communities. Air pollution and traffic congestion The NPPF Policy guidelines require new developments to: 'identify opportunities to improve air quality or mitigate impacts,

such as traffic and travel management, green infrastructure provision and enhancement'. My understanding is that there has not been any air quality monitoring carried out in this area in relation to these development sites. In addition, there has been no monitoring of traffic flow around the local roads near to the sites. An additional 600 homes will contribute significantly to air pollution and traffic congestion along roads that are already heavily congested and gridlocked. These is particularly problematic for school children walking to school who are already subjected to unacceptable levels of vehicle emissions from queuing traffic. It appears that Calderdale Council have not followed NPPF guidelines with regard to air quality management. Impact on local services Resources are currently stretched in many areas of community life including local schools and hospitals: large class sizes and a lack of spaces for local children are challenges faced at all school levels (pre-schools, early years, middle schools and high schools). The local NHS is stretched to capacity in terms of hospital healthcare, just today I waited 1.5 hours for a routine blood test at Halifax Royal Infirmary. I can-not see on the draft Local Plan any potential plans regarding the impact on local services. The local government are responsible for addressing these issues and presenting plans regarding offsetting any detrimental impact due to a sizable population increases.

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/5609644>

Comment ID **HRU967**

Site ref (if applicable): **LP0177**

Person ID: **1241940**

Name: **Mrs Goda Pateman**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

I refer you to the Calderdale Statement of Community Involvement 2015, section 1.2. This section calls for clarity. Many residents of Greetland were unaware of the proposed new allocations ; there was not enough effort on the Council's side to ensure that every resident of Greetland was informed of the Local Plan. People will only be clear, and understand what will happen to their neighbourhood if they are properly and clearly informed. For example: it's unreasonable of the Council to assume that the residents of Greetland would automatically check folder 10 ; Elland Additional Housing Sites. Each of the proposed sites are marked as This statement does not add to clarity. These fields are Greenbelt. Sustainability Appraisal Report ; I refer here to option 4: of the 17 objectives analysed, nine of them have been marked as UNCERTAIN More than half. Were the objectives thoroughly analysed and the findings inconclusive, or were they not analysed thoroughly enough so as to give a conclusive answer? The statement ' UNCERTAIN impact' covers both of the above scenarios. This does not add to clarity.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Has the council Considered the impact of Brexit on the UK's economy? Ruled out all other sites which are less sensitive? Been in talks with neighbouring authorities and asked if they have any potential sites? Considered the impact such a large development would have on the village of Greetland? Considered the direct and indirect impact of flooding on residents and businesses in Greetland, West Vale and Elland and beyond? Considered negative impact of urban sprawl, such as loss of farmland and wildlife, increased car use and neglect of older towns? Additionally: There are no exceptional reasons to remove greenbelt status. Greenbelt spaces were designated to reduce urban sprawl, safeguard the countryside and historic towns, and encourage urban regeneration. The proposed LP fails on all those Disproportionate growth of Greetland community. Table 3 of the Calderdale Infrastructure Delivery Plan 2019 shows the distribution of household growth for 2018-2033. It covers Elland, Greetland, Stainland and Holywell Green in one group. The household growth for the whole area is about 00% , the household growth for Greetland is almost 34%. The Council's decisions are not consistent with what a permissible increase to a community should be: report CC37, LP1028 (Greenbelt) had a planned site for 122 dwellings removed. One of the reasons given was 'disproportionate increase to Barkisland village'. If 16.6% is disproportional to one village then why is an increase of over 22% or even 33.8% not disproportional to another? This shows a lack of consistency in the application of NPPS policies. Paragraph 103 of the NPPF : Significant development should be focused on locations which are, or can be, made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. The proposed development almost invites the need to travel by motor vehicle and therefore increases the congestion and gas emissions. Direct and indirect impact of building on floodplains. The proposed development will have a significant detrimental impact on flooding. The run-off into Black Brook will cause serious downstream effects, for example the floods of 9 th February 2020 saw Greetland Cricket Club, Heath Rugby Club and Clayhouse Park all under water. How can any flood plan mitigate against the risk of even more severe flooding in West Vale and Elland leading to major issues for all the businesses and residents? The local wildlife which is diverse and rich, will be decimated by any further development. Loss of public space. The Council should encourage Calderdale residents to spend leisure time on their doorstep, thereby reducing congestion and emissions generated by car journeys. In this way, public spaces and greenbelt areas would be protected and the wellbeing of residents preserved.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Calderdale have failed to consult residents in open and fair manner regarding the proposed development

Suggested Modifications:

Greenbelt should remain greenbelt. Calderdale Council should seek more creative solutions to repurpose unused and derelict spaces to avoid urban sprawl and avoid creating a doughnut effect. Proposed plans LP0026 (The Gate Farm), LP0177 (Land adjacent Ellistones Place), LP0952 (Land at New Gate Farm) and LP1625 (Land to the west of Silverdale Terrace) should all be removed from the Local Plan

Comments:

Additional Evidence Link:

Comment ID **HRU975**

Site ref (if applicable): **LP0177**

Person ID: **1228589**

Name: **Mrs Debbie Chew-**

Organisation:

Moulding

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

The NPPF states -“Once established Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified , through the preparation or updating of plans.”“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy: makes as much use as possible of suitable brownfield sites and underutilised land; Has this been fully exhausted? optimises the density of development, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport Has this been fully exhausted in already allocated housing sites within the borough, can this be increased? has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground. Has this occurred? The reasons for additional housing is due to the economic strategy and increase in economic growth? Can additional sites be accommodated in neighbouring authorities as part of the Leeds City Region approach? Does the economic strategy need to be revised and updated as a result of Brexit and therefore would there be a need for additional development on this Greenbelt site? The inspector acknowledges that the -“relationship between employment growth and new housing is complex.-“ Turely's report (2019) on -“Modelling the economic implications of the proposed housing requirement Calderdale Council”“contributes to how the labour force is assumed to behave, however, it does not appear to have considered accommodating the housing in neighbouring authorities. It is felt that the Council has not fully exhausted all options in order to prevent development on Green Belt land. When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport . The site reports indicate that distance to the nearest rail station is more than 2km away and distance nearest bus stop is between 400m & 2km away. It is disputed that this site is well served by public transport. The site report states that“|.“The location has reasonable access to a range of services and facilities although it is more than 400m from a bus stop with a service at least every 30 minutes, and more than 2km from the nearest railway station. It is considered that the Council also do not feel that the site is well served by public transport by stating the word -“ Reasonable”“whilst considering the specific sites, which is considered to go against the principles of NPPF. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open ; the essential characteristics of Green Belts are their openness and their permanence. The 5 key Purposes of Green Belts as the following: to check the unrestricted sprawl of large built-up areas; The site is a large area of greenfield land, which will contribute to the sprawl of the existing built up area. to prevent neighbouring towns from merging into one another; to assist in safeguarding the countryside from encroachment; (Development of these sites, does not assist the countryside from encroachment, the sites are greenfield and will lead to a loss of Grade 3 Agricultural land, which is currently used and is of 'good to moderate' quality of land). to preserve the setting and special character of historic towns; and, to assist in urban regeneration, by encouraging the recycling of derelict and other urban land (The sites

proposed are Greenfield) In addition to the Greenbelt, it is acknowledged that part of the site is within a flood zone 3a with remainder being in flood zone 1. The Council has carried out a Level 2 Strategic Flood Risk Assessment, however, it is questioned the impact of development on this land alongside further implications of flooding within West Vale, Stainland Road and the wider area, which was shown in the recent floods (February 2020).

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

The site is situated within the Greenbelt and contradictory to NPPF. It is considered the site should be removed from the allocation of an additional housing site.

Comments:

Additional Evidence Link:

Comment ID **HRU978**

Site ref (if applicable): **LP0177**

Person ID: **1243601**

Name: **Mr Mark Connett**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

No The proposal for the LP1077 fails to acknowledge many planning guidelines and/or advice given on environmental & social factors. Upon reading the national policy planning framework, I have found many points that contradict what the council is aiming to keep/put in place, the main one I believe is below. Proposals affecting the Green Belt Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are: a) buildings for agriculture and forestry; b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it; c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces; e) limited infilling in villages; f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: " not have a greater impact on the openness of the Green Belt than the existing development; or " not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area

of the local planning authority. To the best of my knowledge the council have failed to notify those closest to the site aware they were even added back in into the plan way back in 17 I don't believe social media and word of mouth should be the way for the local people to find out. I feel it's a lack in communication at the very least.

Do you consider the plan to be Sound?: **No**

Sound Reason:

No Flooding -Calder Valley is well known for flooding let alone the site in question which naturally takes a lot of the surface water that flows from the higher parts of Greetland. The proposal does not meet national policy. The NPPF states that "Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere". The recent floods we had on In February of 2020 only strengthen the point I am trying to make. We are constantly having interruption on our road network by the council having to continually maintain and repair the water system, the water going into these drains as a result of the flood plain being destroyed, this would put even more pressure on this, leading to more roadworks and even greater congestion. Clean Air Policy ; The sheer quantity of houses proposed on this site would mean far higher emissions and air pollution in west vale, on commutes to and from Halifax and beyond. Calderdale Council have declared a climate emergency yet are potentially willing to release greenbelt land with the intention to build a large amount of houses whilst destroying the natural benefits of the trees absorbing and storing the Carbon dioxide that we are creating. This site is also directly surrounding a preschool and the key stage 1 site of The Greetland Academy. Saddleworth Road is already a hugely congested road and that's before development of more houses that would use this road. From September 2020 I will have a child at each of these schools so I feel very passionate about how the children attending these schools will be directly affected from the decline in air quality around them for up to 7 hours a day. The proposition that this site allocation is where they spend most of their time seems highly unjustified when there are many other places in Calderdale more suited. The Green Belt - Loss of large area of Green Belt and Wildlife Corridor The NPPF states that When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused on these grounds alone this site should be removed from the local plan. The Wildlife Corridor has a well-used public footpath that travels the whole length of the proposed Local Plan build site, as well as this the area is home to wild deer, foxes, squirrels, field mice, barn owls, kingfisher and much more. The brook itself is a healthy natural water-course with a thriving population of wild brown trout. Taking away something so natural and therapeutic that benefits local people by getting in touch with nature and to get children out into open spaces should be the last resort and with so many brownfield sites still available I believe this goes against many of the policies on the NPPF. A report recently submitted to the Adult Health & Social Care Scrutiny Board stating the need to retain Green Spaces for the Health and Wellbeing of Calderdale residents. This report was submitted by the Head of Planning. (This report is on Calderdale MBC's Website) Infrastructure - The road network in Greetland is already at breaking point on a good day, let alone when we have endless amounts of roadworks to contend with. the roads simply cannot take the proposed number of cars which all of these houses would bring with them. it takes me a good 20 minutes to do a 0.6 mile journey to the motor way on a morning. Both The Greetland Academy and West Vale Primary are full to capacity, as well as the feeder high school Brooksbank. Stainland Road Medical Centre would also struggle to attend to the additional patients this would bring with it, the local dentist has a 600 place waiting list for NHS patients. Allocation of land - I fail to understand why Greetland, Elland & Stainland have been grouped together, I believe this to be a deliberate attempt to mask the disproportionate quantity of building works being allocated to Greetland. while other wards have no sites added to the local plan. I believe this be

disproportionate to the Greetland area, put that together with them all on one road and it's ridiculous. LP0026, LP0177, LP0952 and LP1625 are all on Saddleworth Road. Greetland is a community in its own right. Greetland is HX4 and a village whereas Elland is HX5 and a town I don't think we shouldn't be grouped together. The government requires land for a local plan to be designed in the whole of Calderdale there is no requirement to assign housing to an area that has such high flood risk, let alone land that routinely floods which will only become more frequent through climate change. density of houses could be increased in areas where land is not susceptible to flooding. Boris Johnson has called for councils to stop building on flood plains as well as the new SoS for Env. George Eustice has also pointed to this being a long term problem on them grounds alone this site along with LP0026, LP1625 & LP0952 should be removed from the local plan due to long term flooding.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

I have not had any notification whatsoever of any potential plans to the local surrounding area.

Suggested Modifications:

This site should be removed from the local plan. Due to insufficient infrastructure and no exceptional circumstance to use Green belt land.

Comments:

Additional Evidence Link:

Comment ID **HRU994**

Site ref (if applicable): **LP0177**

Person ID: **1241730**

Name: **Mrs S Hirst**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

In my opinion the Council have failed to meet its three core principals of Community Involvement namely, Clarity, Inclusivity and Integrity. If it was not for the support of the local community many people would be unaware that the sites have been put back into the Local Plan and that a further consultation period has been made. Exactly what is expected of the general public is also unclear. Phrases such -"Is this Sound" have very little meaning to general public. The use of acronyms, legal and planning -"jargon" make the plan far from user friendly. I do not know how the -"average lay person" can be expected to form a clear and sound argument. With this in mind I would say that the plan is not at all -"inclusive" and as such would exclude a number of people from being able to express their opinions. The Local Plan Website is extremely challenging to navigate, even for the most computer literate. The Council are showing very little Integrity, with local Councillors and the community not being kept up to date with what is happening. The council has also failed to listen to the community in compiling the plan. Residents were asked to comment on the removal of this site (LP0177) from the Green Belt in 2015 and then on its inclusion in the Local Plan in 2017 . In both instances the overwhelming response from the community was that the land should not be in the Local Plan and should remain within the Green Belt. The sites in Greetland got the highest number of comments compared to the rest of Calderdale. Despite this, the Council, after initially removing the site, has now put it back into the Local Plan with no sound reasoning to support its actions. In addition,

concern has been expressed by residents, as to why Greetland has been classified as part of Elland. Greetland is completely separate from Elland and it is misleading for the two areas to suddenly be - "consolidated". Residents of Greetland, on reviewing the Local Plan would have no reason to - "look under" Elland and would miss the opportunity to put forth their comments. Within the - "Settlement Hierarchy" the villages of Greetland/West Vale are not even listed, but the villages at either end of the Greetland (Holywell Green and Barkisland) are listed as Neighbourhood/Small rural areas. In connection with this, there are also questions as to true increase in the amount of housing stock for the Greetland area. In the Councils calculation for - "Distribution of House Growth" (Table 3 Infrastructure Delivery Plan 2019) it shows Greetland, along with Elland, Holywell Green & Stainland to have a growth of 8.21%. However, if Greetland and West Vale are viewed on their own ; which they should be ; using the latest Polling District Figures, the increase in housing stock is around 20%. This is too much for a village of this size and with such limited infrastructure. The Council also appear to have - "gone against" a number of policies set out in the National Policy Planning Framework such as: When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations . The council have not demonstrated that development of this Green Belt will outweigh the harm. The Council have simply created a vague list of possible ways to - "mitigate" problems, most of which have no concrete or sound basis and in some cases are just totally incorrect. When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. The land proposed for development is used as a natural storage area which controls the amount of water going down to Black 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 3-5 areas. This area of Green Belt is also classified as being highly sensitive. In 2018 the Council deemed that this area of land was of such significantly high importance that it should be removed from the local Plan and yet now feels that the land is suitable for development. The council have not demonstrated any sound reason for this reversal, other than more land is required. The council have also failed produce any evidence, to show that all available Brownfield sites have been exhausted. Indeed, when challenged, they seem unable to produce any current information with regards to Brownfield availability. Removal of this Green Belt land could, set the precedence for removing even more of the land from the Green Belt and for development to take place all along the valley. Any development of this Green Belt area would have a major impact on the landscape and dramatically change the character of the locality forever. The development of this area would also mean a considerable loss of Open Space. The Council have stated in their report that removal of this land would have - "no loss/no impact" on the area. There seems to be no consideration that taking the Saddleworth Road Development as a whole, would mean a loss of nearly 25 hectares of open Green space which would have a detrimental effect on the local community. The site two public rights of ways going through it. They are 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. Whilst the developers have stated that rights of way 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 rain fall, recent examples being the boxing Day Floods 2015 and the more recent floods after Storm Ciara 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 ways. ENVIRONMENTAL HEALTH The creation of so many houses is going to have a large impact on the amount of pollution created. The development, across all the sites on Saddleworth road, has the potential to add over 1000 cars to the road. Currently pollution figures are not collected for Saddleworth Road due to -"its open nature"- allowing pollution to disperse. However, this natural -"escape route"- will be eroded if this considerable area of land is developed. Currently traffic can be queued nearly half a mile up Saddleworth Road waiting to get through the traffic lights in West Vale. The possibility of an increase in cars will mean more cars on the roads, with more engines idling and pumping out more pollution. This is particularly worrying due to the local infant school being next to the road. Monthly Pollution readings for West Vale obtained from 2019 Air Quality Annual Status Report show that these monthly readings regularly exceed the 40mg/ limit, which has been set by the Council. More traffic will only increase these numbers which will be against their own targets. INFRASTRUCTURE The MP for Calderdale 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 is unusual in that it split over two sites which are approximately half a mile apart. The intake is based on the proximity to the school site on Saddleworth Road. With the increase in housing on this road it could potentially mean that children living next to the School on Rochdale road could not secure a place. Potentially it could mean parents having to drive their children to schools away from the village thus adding to the congestion and pollution. The public transport is very limited, buses to Halifax run once every hour, do not operate in an evening and have limited service at a weekend. The buses frequently miss and consequently you are unable to rely on them as a means of commuting to work. The main concern though is how the increase in traffic will impact on the area. The report states that -"Mitigation measures are likely to be required at the Stainland and Saddleworth road Junction"- however it does not detail what the -"mitigation"- will be. Whilst local road improvements are due to happen 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 9 uncertain impacts, 4 negatives and only 3 positives. When read in detail I would even question the validity of some of these -"positive"- impacts and suggest they are more suited to uncertain or even negative. Given the amount of uncertain and negative points raised, I would question the validity of recommending this site as a suitable and sustainable area for development. Whilst we have been told that each site must have a separate and different submission it has been nearly impossible to do this as each area of land is 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:

Suggested Modifications:

Comments:

Additional Evidence Link:

Main Issues and Council Response

Legal Compliance

Main Issues:

1. Ineffective public consultation with residents. No opportunity for local councillors to discuss increasing the housing requirement.
2. The Plan has not been prepared in line with the Statement of Community Involvement.
3. Question whether the Sustainability Appraisal has been used effectively, as allocation of this site is in direct conflict with the SA. SA is insufficiently detailed.
4. Development will increase flood risk. The Plan does not comply with NPPF, nor flooding legislation in this regard. No reference to flood mitigation.
5. Council should demonstrate that brownfield sites with suitable infrastructure have been considered.
6. No legal justification for releasing land from Green Belt. Objectively assessed need does not amount to exceptional circumstances as demonstrated by Judicial review of the Nottingham Local Plan. Lack of exceptional circumstances. Economic growth should not be a reason to build on Green Belt when alternatives exist.
7. The plan ignores all planning advice and requirements regarding environmental and social issues.
8. The Local Plan is based on out of date information given we have left the EU.
9. Impact on Bradley Hall Farmhouse.
10. Air pollution.
11. Loss of Green Belt, open space and countryside cannot be mitigated against. Brownfield land prioritisation.
12. Ecology - impact on ecology, including bats, and on Black Brook and the Wildlife Corridor.
13. Lack of infrastructure, including Doctors, Dentists, school places and public transport.
14. The Plan does not meet para 177 of NPPF.
15. Council has failed to demonstrate that development will not negatively effect existing communities.
16. Cumulative effect of this and other sites off Saddleworth Road.
17. Proposed site does not comply with NPPF.
18. No sound reasons why this site has been reintroduced at this stage. No evidence that all sites previously considered and filtered have been reconsidered.

19. The council has not cooperated with Bradford and Rochdale Councils.
20. Development of the site will have a negative impact on mental health.
21. Disproportionate level of development in Greetland.
22. The presence of a housebuilder or developer on board should not be a reason to select a site for allocation.
23. Local road network, specifically capacity and congestion in West Vale. No assessment has been undertaken of the local road network.
24. NPPF ignored in large parts.
25. Loss of right of way.

Council's Response:

1. Extensive and inclusive consultation has been carried out throughout all stages of the Local Plan preparation process in accordance with the Council's adopted Statement of Community Involvement and is detailed in the Consultation Statement (Regulation 22).
2. The Local Plan has been prepared in line with the Statement of Community Involvement and the Regulatory framework.
3. This issue has been responded to under 'Soundness'.
4. This issue has been responded to under 'Soundness' and 'Duty to Cooperate'.
5. This issue has been responded to under 'Soundness'.
6. This issue has been responded to under 'Soundness'.
7. The plan has been drawn up following the NPPF and the regulatory framework.
8. This issue has been responded to under 'Soundness'.
9. This issue has been responded to under 'Soundness'.
10. This issue has been responded to under 'Soundness'.
11. This issue has been responded to under 'Soundness'.
12. This issue has been responded to under 'Soundness'.
13. This issue has been responded to under 'Soundness'.
14. It is not clear in what regard the plan does not meet para 177 of NPPF. The plan has been drawn up following the NPPF and the regulatory framework.

15. 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.

16. This issue has been responded to under 'Soundness'.

17. It is not clear in what regard the site does not comply with the NPPF. The plan has been drawn up following the NPPF and the regulatory framework.

18. The Site Summary in the Site Assessment Report explains why this site is being proposed as an Additional New Housing Site. Document CC37 sets out the process for identifying and assessing the additional site allocations.

19. This issue has been responded to under 'Duty to Cooperate'.

20. This issue is responded to under 'Soundness'.

21. This issue is responded to under 'Soundness'.

22. The selection of sites has been undertaken in accordance with the Site Allocations Assessment Methodology Statement, Publication Draft 2018 (EV51.1). The presence of a housebuilder or developer was not an overriding reason for the allocation of a site. However, the Council is mindful of the requirement in NPPF to ensure the Local Plan identifies specific deliverable sites for years 1 -5, and specific, developable sites or broad areas for growth for the later years of the Local Plan, to meet housing need.

23. This issue has been responded to under 'Soundness'.

24. It is not clear which parts of the NPPF the Local Plan is not compliant with.

25. This issue has been responded to under 'Soundness'.

Test of Soundness

Main Issues:

1. Loss of Highly Sensitive Green Belt, including lack of exceptional circumstances. Lack of evidence that opportunities for brownfield redevelopment have been fully examined. Coalescence of Greetland and Stainland. Need to demonstrate consideration of alternatives. Densities on other sites should be increased to reduce the need for Green Belt release.

2. Cumulative impact/scale of development in the area. This site must be considered along with LP0026, LP0952 and LP1625 as they are interrelated.

3. Infrastructure - Lack of/pressure on existing amenities, services and facilities in the local area, e.g. schools, shops, doctors, utilities, and public transport. Combined sewer overloads discharge into the Black Brook. No current plans to upgrade the sewer system. Travel times to facilities will be longer than stated once this site is developed. Lack of ability for schools to expand. Lack of committed investment.

4. Heritage - regard has not been had to preserving Bradley Hall Farmhouse or its setting. A HIA has not been produced for this site. 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.
5. Flooding - increased risk of flooding. A Sequential Test and Exception Test have not been undertaken. The allocation does not comply with NPPF in terms of flooding.
6. Flooding – building on greenfield sites will increase surface water flooding, and increase flood risk downstream. Does not comply with current policy and legislation on flooding. Knock on effects elsewhere due to mitigation. Site is a natural and essential soak away. Poor drainage including overloaded combined sewer outflows. Complex water system with natural springs. Clay soil in the area make SuDS unsuitable. Provision of SuDS is not a suitable mitigation measure due to health and safety concerns, management and maintenance issues. Council should not build on a flood plain. Green roofs are not a suitable mitigation measure due to maintenance issues and design considerations.
7. Ecology - Impact on wildlife including deer, fox, owls, badgers, squirrels and Black Brook UK BAP Priority Habitat, and the Wildlife Corridor, and need to make net gains on biodiversity.
8. Impact on local road network, specifically congestion in West Vale and at Ainley Top/M62. The transport modelling fails to identify output from the Stainland Road-Saddleworth Road junction. No analysis of traffic flows/noise in Greetland/West Vale. Elland Station will not alleviate congestion at West Vale. Planned improved transport links away from the sites will not alleviate localised congestion. Proposed mitigation is inadequate. Development along Saddleworth Road will have a detrimental impact on the West Vale junctions, further exacerbating an existing issue. Road safety issues linked to school drop off and pick up.
9. Creation of Urban Sprawl - impact on health and wellbeing, increase in pollution, increased car dependency.
10. Impact on air quality, and proximity to neighbouring industrial uses. Particularly impacting on children. No air quality monitoring being undertaken, so no assessment of impact of these sites can be known. Monthly readings of air quality in West Vale regularly exceed the limit set by the Council. Noise pollution due to increased traffic. Development goes against Climate Change Emergency.
11. A planning application on the site was refused in July 2019.
12. The Sustainability Appraisal scores would suggest there are two more suitable sites which should be replacements for LP0952 and LP0177. Question application of the Sustainability Appraisal in the site assessment process.
13. Sites should be allocated that in more suitable locations, nearer amenities.
14. Sites should be allocated to meet needs of the older population.
15. The additional local plan sites will be to meet the needs of "incomers".
16. There are no sites for employment in the Greetland and Stainland ward. This will increase commuting.
17. No consideration of brownfield sites. It is unclear that all brownfield sites have been considered, the

Authority has not demonstrated that it has examined all other options. The Brownfield register is not up to date. The site at West Vale Works and the land vacated by Freudenberg should be included in the Local Plan.

18. The Plan does not provide realistic mitigation for issues such as green belt loss, drainage/flooding, ecology and infrastructure.

19. The Local Plan should be paused until the Brexit transition period has ended and the effects on growth can be better understood. Objectively assessed need is too high as it relates to out of date population projections, which have been superseded by lower ONS projections. Financial forecasting used to determine the number of houses is not sound and should be revised.

20. Has the Council asked other authorities to accommodate some of Calderdale's housing requirement?

21. Cumulative impact of development. Unfair distribution/disproportionate amount of development in Greetland.

22. The Local Plan has not addressed paragraph 177 of the NPPF - relating to Sustainability of Greenbelt Sites.

23. Loss of agricultural land.

24. Site is outside the settlement envelope and would be an intrusion in the open landscape. Would be an isolated form of development and impact on the integrity of Greetland as a settlement.

25. Concern that this site has been unfairly assessed.

26. A large number of new houses being built in the area will lead to an increase in crime.

27. Health and Wellbeing - impact of development on health and wellbeing.

28. Loss of public/open space. Impact on right of way.

29. Loss of archaeological finds and historic buildings in the area.

30. Optimise the density of development including increasing densities on other allocations.

31. Where is evidence that the Northern Powerhouse will generate unprecedented economic growth?

32. The Plan fails to comply with the overarching principles of the NPPF.

33. Economic assumptions should be revised, resulting in lower levels of housing required. Employment estimations are over exaggerated, particularly in retail, health care and public services.

34. Settlement hierarchy work does not refer explicitly to Greetland and West Vale.

35. The SA has not been mapped or measured, with specific relation to ecosystems mapping.

36. Increase housing densities on sites in Brighouse.

37. The sites on Saddleworth Road were added after the draft Local Plan was agreed at full Council.

38. 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.

Specifically, Site specific Hydraulic Modelling and FRA may be required as the site is affected by an ordinary watercourse.

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. 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.

2. The paper to the Local Plan Working Party 17th August 2016 attached to evidence document EV09 considers the distribution of development throughout the Local Plan process. The Council considers its distribution of development to be justified and supportive of sustainable development. 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.

3. The Infrastructure Delivery Plan is a compendium of projected infrastructure provision and it helps to

ensure that this infrastructure is provided in a timely manner and in a coordinated and sustainable way. It sets out the infrastructure that will support the level of development that is proposed in the Calderdale Local Plan. The IDP is a living document, updated on at least a yearly basis and contains a chapter on healthcare, education provision, utilities and public transport. Yorkshire Water has a responsibility to supply potable water and take away waste water. Phasing of development may be necessary to enable improvements to the capacity of some WWTW's.

4. A HIA has been undertaken and is available on the Council's website.

The mitigation measures identified within the HIAs are recommendations to be considered by applicants and Development Management case officers. At the time of a full application submission, applicants may wish to submit a further HIA, which may make varying recommendations in terms of mitigation.

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.

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. The Level 1 scoping work recommended the Council undertake a Level 2 assessment, which has been carried out. Further work will be required, including a flood risk assessment and an Exception Test. Given flooding constraints at the site, the Environment Agency will be consulted as part of any planning application, and will expect matters raised in the Level 2 SFRA to be addressed. A large part of the site has been removed from the developable area due to the flooding risk.

6. The site assessment process considered flooding and drainage issues, and it is considered the site is suitable for development subject to mitigation measures. The Council's Drainage section have stated that any proposal should consider design and layout to reduce flood risk impacts and green infrastructure is required to maximise infiltration and storage of rain water. The NPPF makes it clear that 'inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere'. Supported by the Calder Catchment Strategic Flood Risk Assessment 2016 (SFRA), the Local Plan is focused upon managing flood risk from all sources and applying a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change.

With regard to clay soil being unsuitable for SuDS, it should be noted that many different SuDS techniques can be implemented. As a result, there is no one standard correct drainage solution for a site.

Where flooding constraints have been highlighted on parts of the site through the site analysis process and the SFRA screening exercise, these areas have been removed from the developable area of allocations. Full reasons have been given in the site assessment summary where the developable area of a site has been reduced due to flood risk (as in this instance regarding flood zone 3b - the functional floodplain).

7. The Conservation Section (Ecology) has indicated that development would be acceptable subject to various mitigation measures which have been included as site specific considerations. This includes a reduction of the developable land further by excluding the Wildlife Habitat Network in its entirety together with a 10m buffer, the implementation of a SUDS scheme, mitigating increased recreation pressure on

Black Brook, retaining and enhancing hedgerows. In addition, policies within the Green Infrastructure and Natural Environment chapter of the Local Plan, specifically Policy GN3, set out a clear and positive strategy to ensure the Council effectively manages its natural environment. Additionally, BT3 - Landscaping, ensures that new development integrates appropriately into its surroundings, contributes to the character of the area, and enhances local biodiversity.

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. The traffic modelling has informed the Council about the implications of the development strategy and has helped with the identification of interventions within the IDP and the Transport Strategy.

The 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. The transport evidence provides the basis for the Infrastructure Delivery Plan and the interventions identified to support development across Calderdale.

9. Document EV 09 Exceptional Circumstances for the Release of Green Belt (2018) considers the process that the Council has followed in relation to the potential need to release land from the Green Belt. It can be seen that a methodical approach has been built into each stage of the process and that ultimately this process has dovetailed with the Government's emerging policy on exceptional circumstances. The proposed changes to the Calderdale Green Belt are clearly a last resort and have been minimised. Furthermore, the boundary changes are essential to achieving a sustainable future for Calderdale – one that reconciles economic, social and environmental sustainability. The policies within the Local Plan support the achievement of the Local Plan Transport Objective, 'To ensure the provision of a sustainable, safe and efficient transport system which reduces car dependency and improves quality of life through a balance of promoting economic growth, enhancing environments and improving transport access for communities'. To achieve these objectives the Council is developing a range of strategies and interventions, and the Local Plan has a role to play in supporting these, but also ensuring development proposals meet these objectives and contribute more widely to an integrated 'active mode' network.

10. The Council's Environmental Health Section has highlighted that air quality and the impact of additional road traffic taken cumulatively with other local developments would need to be considered. The impact of road traffic emissions on the residential development itself would not be expected to be significant, and no breach of the air quality objectives for nitrogen dioxide and particulate matter is expected on site. 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 raised as a concern with regards to the proximity to industrial uses. A Noise Impact Assessment is required. Standoffs may be required between any residential development and the camp site, school, farm and existing industrial premises.

11. The planning application was recommended for approval by officers, but refused at Planning Committee, and withdrawn at appeal. The application was for extension to the existing campsite to the west of the site, and it was considered that the proposed benefits arising from the proposal would outweigh the potential harm to the Green Belt in this instance.

12. 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.

13. 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.

14. The Council considers the Local Plan meets the housing needs of all groups of the population. Policy HS4 in particular addresses the needs of older and disabled population.

15. The Local Plan seeks to balance the housing growth with economic aspirations, to reduce in-commuting.

16. The growth of employment alongside new homes within Calderdale will provide opportunities for locally based employment reducing the need to travel. LP0059 is allocated for employment use (B1) and falls within the Greetland and Stainland ward.

17. The allocation process requires a willing land owner and developer in order to demonstrate the deliverability of the sites and therefore whilst there are aspirations to use as much brownfield urban land as possible this may not always be demonstrably deliverable. In terms of the site assessment process, in order to identify the most sustainable sites a 'sequential' approach to housing allocations has been adopted that prioritises brownfield sites in the urban area, only using the most sensitive Green Belt when all alternative sites were used. The Council's most up to date Brownfield Land Register was published on 31 December 2018. A revised register is currently being prepared. The site referred to (West Vale Works) is an allocation in the Local Plan - LP1088. With regards to the Freudenberg site, the site has not been assessed in the Local Plan. The Council has never received a site submission for this site. If this site does come forward for residential development in the future, it will contribute to meeting the housing requirement as a windfall site.

18. The Council considers appropriate mitigation measures have been provided as detailed in the 'Reports Required' and 'Site Specific Considerations'.

19. 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.

20. See Submission Document SD 13 Duty to Cooperate Statement Including Statements of Common Ground (January 2019).

21. 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.

22. This issue has been responded to under 'Legal Compliance'.

23. The site assessment process seeks to protect land which is of higher quality in terms of the Agricultural Land Classification. The site consists of predominantly Grade 3 Agricultural Land which is not considered "high quality".

24. The site is adjacent to the Urban Area, and it is not considered that it would be an intrusion in the landscape nor result in isolated development.

25. All site assessments have been carried out in a consistent manner following the Site Allocations Assessment Methodology Statement, Publication Draft 2018 (EV51.1).

26. Policy BT5 - Designing Out Crime of the Local Plan ensures that designing out crime and designing in community safety should be central to the planning and delivery of new development. The policy includes a range of criteria that the development proposal must have due regard to.

27. Chapter 12 of the Local Plan (Health and Well Being) and guidance contained within the NPPF highlight the role of the planning system in supporting health, social and cultural wellbeing and creating healthy, inclusive communities. A health impact assessment (HIA) helps to ensure that health and wellbeing are being properly considered in planning policies and proposals. Where sites contain public footpaths, schemes will be expected to incorporate this in their layout, or if ultimately necessary, arrange for a suitable diversion.

28. The site is currently designated as greenbelt but also performs the function of a natural/semi-natural open space. An assessment of open space in the area shows that there are sufficient alternative natural/semi-natural areas within the catchment of this site to meet the adopted standards. However if the site is designated for housing, open space would be required as part of any development since there are deficiencies in other typologies. The visual impact of any development should be considered. Where sites contain public footpaths, schemes will be expected to incorporate this in their layout, or if ultimately necessary, arrange for a suitable diversion.

29. A HIA has been undertaken and is available on the Council's website.

The mitigation measures identified within the HIAs are recommendations to be considered by applicants and Development Management case officers. At the time of a full application submission, applicants may wish to submit a further HIA, which may make varying recommendations in terms of mitigation. With regards to archaeological finds, a Predetermination Archaeological Evaluation is listed in Report Required. Policy HE3 also requires proposals affecting a Class III archaeological site should conserve those elements which contribute to its significance.

30. Density multipliers were considered in order that the site capacities were reflected as accurately as possible, and without overstating capacity. The density multipliers agreed by the SHLAA Working Group were based on those included in 'Tapping the Potential' published in 2000. These have been used in assessing the housing allocations in order to determine indicative site capacity. . The revised housing requirement is to be partially met through an increase in densities on some of the mixed use sites.

31. The Council considers that the methodology adopted in the Employment Land Study (EV1) and the Employment Technical Paper ((EV02) meets the requirements of National Planning Policy Guidance.
32. This issue has been responded to under 'Legal Compliance'.
33. 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 figure was derived.
34. The settlement hierarchy has not been used as the basis for distribution of development. As the Local Plan developed it was found not possible to for settlements within the higher tiers to accommodate as much growth as initially anticipated.
35. 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.
36. Density multipliers were considered in order that the site capacities were reflected as accurately as possible, and without overstating capacity. The density multipliers agreed by the SHLAA Working Group were based on those included in 'Tapping the Potential' published in 2000. These have been used in assessing the housing allocations in order to determine indicative site capacity. The revised housing requirement is to be partially met through an increase in densities on some of the mixed use sites.
37. The sites included within this consultation were agreed at a meeting of Cabinet on 14 October 2019.
38. Environment Agency comments to be integrated in site assessment summary where appropriate.

Duty to Co-operate

Main Issues:

1. There are no justifiable exceptional circumstances for change of use of this Green Belt land. Result in urban sprawl.
2. No justifiable reasons to increase flood risk. Development will increase surface water run off.
3. Allocation does not comply with current policy and legislation on flooding, air pollution or climate change.
4. The Council is obliged to work with other authorities, the Environment Agency and other prescribed bodies in relation to wider flood risk.
5. Development of Green Belt land would effect character of the area, be detrimental to ecology and

residents, and be illegal with regards to flooding and Green Belt policy.

6. Ineffective public consultation. Consultation has been minimal with limited time to prepare objections, and no notifications have been given to residents. It is extremely difficult and complex to comment on the plans through the web-site. No consultation with Ward Members.

7. Does not comply with NPPF as West Vale Works should be included in the Local Plan.

8. Does not comply with government policy with regards to brownfield redevelopment.

9. Concerns about the way in which the Local Plan has been formulated and worries about the influence and involvement of major developers in selecting sites.

10. The Council has not demonstrated that it has satisfied the duty to cooperate.

11. Constraints and negative effects cannot be mitigated against. Not viable to build houses here.

12. Economic forecasts that the plan uses are out of date... and therefore do not represent an ongoing basis of strategic review.

13. Local road network, specifically congestion, capacity and road safety.

14. Increase in air pollution

15. Infrastructure - Lack of/pressure on existing amenities, services and facilities in the local area, e.g. schools, shops, doctors, utilities, and public transport.

16. Ecology - loss of ecology and wildlife, including bats, deer, foxes.

17. No evidence that all sites previously considered and filtered have been reconsidered.

18. The sites on Saddleworth Road were added after the draft Local Plan was agreed at full Council.

Council's Response:

1. This issue has been responded to under 'Soundness'.

2. This issue has been responded to under 'Soundness'.

3. These issues have been responded to under 'Soundness'.

4. Local Plan Policy CC2 requires new development to follow a sequential risk based approach and be directed away from flood zones 2 and 3 in accordance with the principles of the National Planning Policy Framework. Policy CC2 also requires development to have full regard to and compliance with the advice of the Environment Agency, the objectives and priorities for flood risk management set out in the Local Flood Risk Management Strategy and the published evidence of local flood risk and its significance as included in Strategic Flood Risk Assessments, Surface Water Management Plans and other recognised sources of flood risk data.

5. This issue has been responded to under 'Soundness'.

6. This issue has been responded to under 'Legal Compliance'.
7. The site at West Vale Works is a site in the Local Plan LP1088.
8. This issue has been responded to under 'Soundness'.
9. This issue has been responded to under 'Soundness'.
10. 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.
11. This issue has been responded to under 'Soundness'.
12. The Council considers that the methodology adopted in the Employment Land Study (EV1) and the Employment Technical Paper (EV02) meets the requirements of National Planning Policy Guidance.
13. This issue has been responded to under 'Soundness'.
14. This issue has been responded to under 'Soundness'.
15. This issue has been responded to under 'Soundness'.
16. This issue has been responded to under 'Soundness'.
17. This issue has been responded to under 'Legal Compliance'.
18. This issue has been responded to under 'Soundness'.

Suggested Modifications

1. Remove this site from the Local Plan.
2. Further demonstrate the site is suitable for inclusion in the Local Plan.
3. West Vale Works should be included in the Local Plan as an alternative brownfield site.
4. Develop existing brownfield sites.
5. Further evidence is required demonstrating the sites suitability in terms of traffic assessments and flooding.
6. The economic growth calculation should be reconsidered.
7. Remove sites within 'most sensitive Green Belt' parcels.
8. Update the Brownfield Land Register

9. Reduce the size of the site.
10. Revisit the flawed economic assumptions. Prepare post Brexit economic assumptions.
11. Increase housing densities in Brighouse.
12. Neighbouring authorities should accommodate some of Calderdale's need.
13. Environment Agency comments to be integrated in site assessment summary where appropriate.
14. Amend Site Specific Consideration to ensure no harm to setting of heritage assets in the vicinity.

Council's Response:

1. No change required - The allocation of the site is considered to be consistent with the Council's site allocation methodology and positioning in the trajectory as set out in the Housing Technical Paper. Document EV 51.1 Site Allocations Assessment Methodology - Publication Draft (2018) details the process the Council has followed in relation to the site assessment process. The document outlines the various stages of assessment from initial site identification to the implementation of the Sequential Approach.
2. No change required - The allocation of the site is considered to be consistent with the Council's site allocation methodology and positioning in the trajectory as set out in the Housing Technical Paper. Document EV 51.1 Site Allocations Assessment Methodology - Publication Draft (2018) details the process the Council has followed in relation to the site assessment process. The document outlines the various stages of assessment from initial site identification to the implementation of the Sequential Approach.
3. No change required - This site is included in the Local Plan - Site ref LP1088.
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. 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.
5. The Council considers that the evidence submitted supports and justifies the content of the Local Plan.
6. 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).
7. No change required - In terms of the site assessment process, in order to identify the most sustainable sites a 'sequential' approach to housing allocations has been adopted that prioritises brownfield sites in the urban area, only using the most sensitive Green Belt when all alternative sites were used. Document EV 09 Exceptional Circumstances for the Release of Green Belt (2018) considers the process that the Council has followed in relation to the potential need to release land from the Green Belt. The proposed changes to the

Calderdale Green Belt are clearly a last resort and have been minimised.

8. A revised Brownfield Land Register is currently being prepared.

9. 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.

10. No change required - 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

11. No change required - Density multipliers were considered in order that the site capacities were reflected as accurately as possible, and without overstating capacity. The density multipliers agreed by the SHLAA Working Group were based on those included in 'Tapping the Potential' published in 2000. These have been used in assessing the housing allocations in order to determine indicative site capacity.

12. No change required - The Calderdale SHMA (2018) (EV36) demonstrates that Calderdale is a predominantly self-contained housing market, albeit with linkages to other areas. Therefore, the Local Plan aims to accommodate all the objectively assessed needs identified for housing within Calderdale. A similar approach of meeting their own needs is being taken by neighbouring authorities. See Submission Document SD 13 Duty to Cooperate Statement Including Statements of Common Ground (January 2019).

13. Agreed. Environment Agency comments to be integrated in site specific considerations where appropriate.

14. Agreed. The Council has prepared a Statement of Common Ground with Historic England, and has agreed amended wording for the Site Specific Considerations for sites included in the Publication Draft Local Plan. This wording will be amended for all additional sites in this consultation.

Representations

Comment ID **HRU1011**

Site ref (if applicable): **LP0952**

Person ID: **1243830**

Name: **Mr Howard Wood**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

It does not comply with the NPPF

Do you consider the plan to be Sound?: **No**

Sound Reason:

It is not consistent with the NPPF framework

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/5609668>

Comment ID **HRU1031**

Site ref (if applicable): **LP0952**

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:

I would consider the original local plan to be legally compliant. This amendment is not, for the following reasons - It does not meet national strategic planning guidelines regarding building on flood planes and water run off areas. It does not meet national strategic planning guidelines regarding building on greenbelt and greenfield sites as opposed to brownfield sites. No consideration has been given to the impact of this level of building (all 4 local sites) on air quality in this particular valley (where mist and smoke from local

factories can regularly be seen hanging in the lower areas) - which is supposedly a priority of Calderdale Council.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Air pollution - the impact of building on this scale and the resulting increase in road and traffic useage would have a hugely detrimental affect on air quality in the Valley. There are currently a couple of factories in the bottom of the valley and we regularly see mist and smoke lingering and hanging along the lower areas. The school is in the lower part of the valley - right in the middle of the most affected areas. The increase in vehicle numbers would also put huge pressure on local roads. In both directions on Saddleworth road there are already bottlenecks - west vale and ripponden. Local amenities are already under pressure - school is full, doctors and dentists too. Where are the increased amenities for all these extra people? Water. The valley is steep. It is full of springs - obvious in some of the road and area names. The water runs down to Black Brook. Regularly, the fields are full of actively running streams and pooled areas where the water makes it way through to the Brook. Even now, houses are flooded round this field and certainly if building were to happen in this field, it would certainly interfere with run-off - potentially having catastrophic impact on any housing and further down the valley in Elland and West Vale as the water finds other ways to move through the valley. Urban sprawl. Greetland used to be a village. Already it has grown with a number of large developments e.g. Goldfields (at the top of the valley) and infilling through individual and small sites. There is no infrastructure to be larger than it is and the danger is that particular, individual villages such as Greetland, West Vale, Stainland, Barkisland, merge together into an unattractive and ineffective mass of houses.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

The plan was not amended with due consultation with any communities or even the knowledge of local councillors.

Suggested Modifications:

Remove the site from the plan

Comments:

Additional Evidence Link:

Comment ID **HRU1032**

Site ref (if applicable): **LP952**

Person ID: **1243202**

Name: **Mr Lee Roberts**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

We the public have never been informed about this development

Do you consider the plan to be Sound?: **No**

Sound Reason:

FLOODPLAIN The proposed development is on a natural floodplain, it flooded out of all proportion during the boxing day floods of 2015, the flood destroyed 3 bridges and hundreds of homes and businesses, we were told at the time it was a once in a lifetime flood, it happened again during storm Ciara 9th of February and it happened again a week later during storm Dennis, if it wasn't for this natural floodplain holding back millions of gallons of water heaven knows how much more damage and misery would have been caused further down the valley in West vale, Elland and Brighouse, the water pours down the hillsides from Barkisland, upper Greetland and Stainland into Black brook, the floodplain does a excellent job of storing and holding back a large proportion of the water, even during the dry summer months the water still pours down the hillsides and the land around this area is still soddened. **INFRASTRUCTURE** Along with another 600 new developments will come a thousand plus new vehicles onto the roads which are struggling to cope, the roads around too narrow to be classified as main roads, at peak times the traffic backs all the way from the traffic lights all the way back up into Stainland, also it backs up from the traffic lights up Saddleworth road as far as Greetland academy were we live we have had 3 cars written off in the period we have lived here, our cars also succumb to numerous bumps and scrapes through other vehicles trying to squeeze through the traffic when there isn't enough space to get through, in the opposite direction the traffic backs up from the traffic lights to the scissor junction and beyond up into Elland, I would be very interested to know how calderdale council can remedy this with all the extra vehicles, also there is no new proposed businesses starting up in the area so everyone would jump into their cars and travel further afield with evermore traffic on the roads. **Greenbelt** The proposed new development site is also a very valuable greenbelt/wildlife corridor which supports a wealth of wildlife including bats which are a protected species, newts , woodpeckers, kingfisher, dippers, heron, fox, deer and owls which make their homes in the mature trees, we as a community share this precious area with all this wildlife, to relax, unwind and destress, there is also a public right of way that runs the entire length of the site. **AIR QUALITY/POLLUTION** There is also the inevitability of more air pollution with a down turn of air quality introducing a thousand plus more vehicles into the area, considering we have a local school Greetland academy which is full of young children would it be fair to be poisoning them with yet more exhaust fumes. **DISPROPORTIONATE** This is also a disproportionate amount of new homes for such a small area of Greetland, without the protection of our greenbelt we would merge into the local towns and villages and lose our identity.

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/5609677>

Comment ID **HRU1042**

Site ref (if applicable): **LP0952**

Person ID: **1243857**

Name: **mr ralph brook**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

please see attached file

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609689>

Comment ID **HRU1049**

Site ref (if applicable): **LP0952**

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 This site provides a very strong green belt boundary and moving this would enable a major encroachment into the open countryside. Greetland has many brown field sights which should be built on first. There are a limited number of green belt sites in the village, so they should be protected at all cost. The land is used by residents, children and walking groups to enjoy local nature which has positive benefits on health and wellbeing, within walking distance for the community to enjoy. **FLOOD PLAIN** The land proposed for development is on a flood plain with natural springs flowing down the Greetland hillside with the land, hedges and trees acting as sponges with the land boggy after rain. This was demonstrated in February 2020 after the storms and building on this land would add to the existing flooding problems throughout Calderdale. **WILDLIFE** The local wildlife will be devastated by this development including birds

such as Herons, Kestrels, Kingfishers, Owls and also Bats which are seen regularly in the area, along with Foxes, Deer TRAFFIC CONGESTION This development has only one road in and out which is already congested, and the new residents would need to use their cars as there are no regular busses and local schools are oversubscribed meaning parents would have to use their cars to take children to schools out of the area. It is already extremely timely to pass through the traffic lights at West Vale and the development will only add to the congestion both in West Vale and Ripponden. AIR POLLUTION There is already congestion on Saddleworth Road with cars sat in stationary traffic with engines running throughout peaks times. This new development has the potential to put an additional 1200 cars on the road all adding to the air pollution which will be breathed in by the children playing in the school yards next to the roads. INFRASTRUCTURE Greetland is a village not a town and the current infrastructure is simply not geared up to cope with 600+ houses in the area. Schools are full with no space to expand their buildings and facilities further. Doctors are full to capacity and Dentists already have long waiting lists. The traffic issues have been cited above.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1052** Site ref (if applicable): **LP0952**

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 **HRU1062**

Site ref (if applicable): **LP0952**

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:

he 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 the amount of building proposed in Greetland is disproportionate to other areas in Halifax in addition to the previous reasons stated, I believe that the proposed plans are therefore not sound.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

10 Elland Additional Housing Sites : I am at a loss to understand how Greetland can be categorised as Elland and find the heading very misleading. I wonder if this was to enable plans to go under the radar, so to speak, of concerned residents of Greetland. The fact that I only found out about the plans to build on the proposed sites and the extent of the development through a Facebook post, I feel, does not comply with the Duty to Co-operate.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1063**

Site ref (if applicable): **LP0952**

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 NPPF has not been adhered to. This consultation process does not adhere with the Planning & Compulsory Purchase Act 2004. It is too difficult to comment on these proposals.

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 been ignored. Economic Need Turley's report of August 2019 'Modelling the Economic Implications of the Proposed Housing Requirement' is Flawed. The housing need therein 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. Flooding The 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. See the attached photos showing surface run off (land saturated) at this site following heavy rainfall from storm Ciara, housing will make this land impermeable and all the rainfall that hits the site will turn into surface run off and the local rivers will reach and breach capacity more quickly. Infrastructure The roads are at gridlock as it is. West Vale, Barkisland, Stainland and Ripponden are all bottlenecks for traffic. There are not enough school places for the proposed households. Green Belt The NPPF chapter 13 has been ignored by the council. Building on Green Belt should be the last resort. There are lots of Brownfield sites that could be used for new housing. 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. The attached Green Belt Site Survey Form confirms the importance of this site for separating existing villages. 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. This site is the farthest (of the Greetland sites) from established housing, it acts as a barrier between urban areas and to lose it would be to see encroachment on the countryside. 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/infrastructure 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:

Calderdale has not effectively cooperated with all neighbouring councils being Bradford, Kirklees, Oldham and Rochdale et al. This plan should not be adopted.

Suggested Modifications:

Remove sites LP0026, LP0177, LP0952 and LP1625 from the plan. Increase housing densities at the Brighouse sites. incorporate Brownfield sites. Revisit the currently flawed economic projections made by Turley.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609691> ; <http://calderdale-consult.objective.co.uk/file/5609690>

Comment ID **HRU1068**

Site ref (if applicable): **LP0952**

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 Fibril/ Bosch. This is due to employer being unreasonably constrained to invest in the site due to emission legislations. The existing stack would be approximately 50m from the proposed site. The result could see a major employer to the area leaving Calderdale to develop an alternative site which does not support employment growth. The development will impact on access to open space which will negatively impact on mental health. Amenities Paragraph 94 of the NPPF states that ' It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: 28 a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and b) work with schools. The Local Plan in Greetland has not seen any of this work done in relation to the local junior schools. As far as parents and the local community are aware the local school has not been consulted on the Local Plan. Due to the fact that The Greetland Academy and West Vale School are academies, they cannot be pushed to expand, this is in direct opposition to the National Planning Policy Framework, and therefore not compliant. We know that the primary school is already oversubscribed. The scale of proposed development would completely overwhelm an already oversubscribed school. Children already living in Greetland may face a situation where there is no place available to them at their local junior school. There is also a very real increased risk posed to the children of Greetland Academy, should the proposed development go ahead. The local Doctors surgery is full and so do not have the capacity to take on more people in terms of health car. Therefore the development is not sustainable with the local economy unable to support the increase in population. Flooding Calderdale has experienced how unpredictable the water system is particularly in this area, we are constantly reminded of the topography of our landscape and the surrounding areas, and the impact it already has on our lives. Over thirty million pounds has so far been spent on flood defences in Calderdale, and still we have to have the Army called in to help protect us from flood water. It is not right to build on the land in Greetland put forward in the Local Plan. Flooding cannot be militated against in this area. The land as it stands, is helping to prevent further disaster, and must remain as it is. To even suggest altering the way in which this land functions is an inappropriate and irreversible gamble. It is not fair to gamble with the lives of the community, when the community is so opposed to it. The NPPF states that the Local Plan should take account of climate change over a long period of time, including factors such as flood risks, changes to biodiversity and landscape. The NPPF also states that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. To so dramatically change the function of the landscape of the sites put forward for development in Greetland would completely disregard the risk climate change poses to the community on the form of flooding. The entire proposed site falls within a flood zone, where we have seen the impact of flooding in 2015 and more recently in February 2020. The risk of severe wide area flooding is increasing and therefore remains a high risk. To build on this site would compromise the flood storage area and no surface water drainage network, 10m cordon or green roofs will mitigate the risk of flooding as we have clearly seen up and down the Calder Valley. I would consider it immoral to allow home owners to purchase new homes with the prospect of not being able to obtain sufficient house insurance due to proximately of flood zones. Black Brook is a haven for wildlife and is a UK BAP priority habitat. Any development including access roads will have a negative impact to wildlife including deer and herons even with a proposed 10 m cordon due to noise, traffic light pollution. How can the Council consider developing a green belt land with such a rich wildlife and a high risk of flooding when there are other sites available?

Do you consider the plan to be Sound?: **No**

Sound Reason:

Green Belt I am not satisfied that the Council has demonstrated exceptional circumstances to justify the release of land from the Green Belt which would destroy valuable agricultural land. Section 11 in the NPPF outlines what is meant by the efficient use of land. It states that the Local Plan must follow planning policies and make decisions which encourage the efficient use of land by re-using land that has previously been developed (brownfield land). This has not effectively been carried out in the area. We have a number of undeveloped brownfield sites in the area, which have not been properly pursued. Traffic With the associated increase in traffic it would compound the road infrastructure especially around the junction with Saddleworth Road and Stainland Road. There has been no investment in this bottleneck where public transport offers no mitigation since buses are also trapped within the queuing traffic resulting commutes into Halifax in excess of 15 minutes and journeys to Hospitals approaching 60 minutes. The transport infrastructure is unable to support this development with access to the rail network being beyond 2 km. The Highways England have themselves suggested that the development of this site not to commenced until the completion of the Road Investment Strategy and then more enhancement is needed beyond 2030. Air Pollution With the increase in standing traffic from the 1200 cars (based on two cars per household from the proposed 600 houses) will also impact on air pollution around dwellings, schools and nursing homes. Such a disproportionally high increase in air pollution will have unthinkable implications for the children of our community. If the government has set targets to reduce air pollution then it does not make sense to allocate such a vast proportion of the overall planning to one area, along one road, where the pollution in the air will become concentrated and toxic. Economic growth The increased housing allocation within the Local Plan is based on projected economic growth, however as both the Inspector and the Council have acknowledged this calculation on based on assumptions. I would like to quote Councillor Sutherland when he addressed the Cabinet during a meeting on the 14th October 2019; "There were not many opportunities for the Council to make decisions in Planning, and once greenbelt sites were built on, there would be no opportunities to change this which would have a lasting impact on Calderdale. In essence, what were the tangible benefits on these sites and how would these be balanced and tested? - "With no evidence on economic growth, Green belt land is proposed to be developed which is unjustified. In a perverse way, residential dwellings close to industrial buildings will have a negative impact such as Sia Fibril/ Bosch. This is due to employer being unreasonably constrained to invest in the site due to emission legislations. The existing stack would be approximately 50m from the proposed site. The result could see a major employer to the area leaving Calderdale to develop an alternative site which does not support employment growth. The development will impact on access to open space which will negatively impact on mental health. Amenities Paragraph 94 of the NPPF states that ' It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: 28 a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and b) work with schools. The Local Plan in Greetland has not seen any of this work done in relation to the local junior schools. As far as parents and the local community are aware the local school has not been consulted on the Local Plan. Due to the fact that The Greetland Academy and West Vale School are academies, they cannot be pushed to expand, this is in direct opposition to the National Planning Policy Framework, and therefore not compliant. We know that the primary school is already oversubscribed. The scale of proposed development would completely overwhelm an already oversubscribed school. Children already living in Greetland may face a situation where there is no place available to them at their local junior school. There is also a very real increased risk posed to the children of Greetland Academy, should the proposed development go ahead. The local Doctors surgery is full and so do not have the capacity to take on more people in terms of health car. Therefore the development is not sustainable with the local economy unable to support the increase in population. Flooding Calderdale has experienced how

unpredictable the water system is particularly in this area, we are constantly reminded of the topography of our landscape and the surrounding areas, and the impact it already has on our lives. Over thirty million pounds has so far been spent on flood defences in Calderdale, and still we have to have the Army called in to help protect us from flood water. It is not right to build on the land in Greetland put forward in the Local Plan. Flooding cannot be militated against in this area. The land as it stands, is helping to prevent further disaster, and must remain as it is. To even suggest altering the way in which this land functions is an inappropriate and irreversible gamble. It is not fair to gamble with the lives of the community, when the community is so opposed to it. The NPPF states that the Local Plan should take account of climate change over a long period of time, including factors such as flood risks, changes to biodiversity and landscape. The NPPF also states that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. To so dramatically change the function of the landscape of the sites put forward for development in Greetland would completely disregard the risk climate change poses to the community on the form of flooding. The entire proposed site falls within a flood zone, where we have seen the impact of flooding in 2015 and more recently in February 2020. The risk of severe wide area flooding is increasing and therefore remains a high risk. To build on this site would compromise the flood storage area and no surface water drainage network, 10m cordon or green roofs will mitigate the risk of flooding as we have clearly seen up and down the Calder Valley. I would consider it immoral to allow home owners to purchase new homes with the prospect of not being able to obtain sufficient house insurance due to proximately of flood zones. Black Brook is a haven for wildlife and is a UK BAP priority habitat. Any development including access roads will have a negative impact to wildlife including deer and herons even with a proposed 10 m cordon due to noise, traffic light pollution. How can the Council consider developing a green belt land with such a rich wildlife and a high risk of flooding when there are other sites available?

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1073**

Site ref (if applicable): **LP0952**

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/5609694>

Comment ID **HRU1085**

Site ref (if applicable): **LP0952**

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 **HRU1088**

Site ref (if applicable): **LP0952**

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 "LP0952 - Main Points of Objection"

Do you consider the plan to be Sound?: **No**

Sound Reason:

Please see attached pdf document "LP0952 - 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 "LP0952 - Main Points of Objection"

Suggested Modifications:

N/A

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609700>

Comment ID **HRU1105**

Site ref (if applicable): **LP0952**

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. 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Due to the fact that The Greetland Academy and West Vale School are academies, they cannot be pushed to expand, this is in direct opposition to the National Planning Policy Framework, and therefore not compliant. We know that the primary school is already oversubscribed. The scale of proposed development would completely overwhelm an already oversubscribed school. Children already living in Greetland may face a situation where there is no place available to them at their local junior school. There is also a very real increased risk posed to the children of Greetland Academy, should the proposed development go ahead. The local Doctors surgery is full and so do not have the capacity to take on more people in terms of health care. Therefore the development is not sustainable with the local economy unable to support the increase in population. Flooding Calderdale has experienced how unpredictable the water system is particularly in this area, we are constantly reminded of the topography of our landscape and the surrounding areas, and the impact it already has on our lives. Over thirty million pounds has so far been spent on flood defences in Calderdale, and still we have to have the Army called in to help protect us from flood water. It is not right to build on the land in Greetland put forward in the Local Plan. Flooding cannot be militated against in this area. The land as it stands, is helping to prevent further disaster, and must remain as it is. To even suggest altering the way in which this land functions is an inappropriate and irreversible gamble. It is not fair to gamble with the lives of the community, when the

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Do you consider the plan to be Sound?: **No**

Sound Reason:

Green Belt I am not satisfied that the Council has demonstrated exceptional circumstances to justify the release of land from the Green Belt which would destroy valuable agricultural land. Section 11 in the NPPF outlines what is meant by the efficient use of land. It states that the Local Plan must follow planning policies and make decisions which encourage the efficient use of land by re-using land that has previously been developed (brownfield land). This has not effectively been carried out in the area. We have a number of undeveloped brownfield sites in the area, which have not been properly pursued. Traffic With the associated increase in traffic it would compound the road infrastructure especially around the junction with Saddleworth Road and Stainland Road. There has been no investment in this bottleneck where public transport offers no mitigation since buses are also trapped within the queuing traffic resulting commutes into Halifax in excess of 15 minutes and journeys to Hospitals approaching 60 minutes. The transport infrastructure is unable to support this development with access to the rail network being beyond 2 km. The Highways England have themselves suggested that the development of this site not to commenced until the completion of the Road Investment Strategy and then more enhancement is needed beyond 2030. Air Pollution With the increase in standing traffic from the 1200 cars (based on two cars per household from the proposed 600 houses) will also impact on air pollution around dwellings, schools and nursing homes. Such a disproportionally high increase in air pollution will have unthinkable implications for the children of our community. If the government has set targets to reduce air pollution then it does not make sense to allocate such a vast proportion of the overall planning to one area, along one road, where the pollution in the air will become concentrated and toxic. Economic growth The increased housing allocation within the Local Plan is based on projected economic growth, however as both the Inspector and the Council have acknowledged this calculation on based on assumptions. I would like to quote Councillor Sutherland when he addressed the Cabinet during a meeting on the 14th October 2019; "There were not many opportunities for the Council to make decisions in Planning, and once greenbelt sites were built on, there would be no opportunities to change this which would have a lasting impact on Calderdale. In essence, what were the tangible benefits on these sites and how would these be balanced and tested? - "With no evidence on economic growth, Green belt land is proposed to be developed which is unjustified. In a perverse way, residential dwellings close to industrial buildings will have a negative impact such as Sia Fibril/ Bosch. This is due to employer being unreasonably constrained to invest in the site due to emission legislations. The existing stack would be approximately 50m from the proposed site. The result could see a major employer to the area leaving Calderdale to develop an alternative site which does not support

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Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1108**

Site ref (if applicable): **LP0952**

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 at the bottom of the valley 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 in this area. If the events of the Boxing Day 2015 floods are regarded as a freak event, think again as the valley bottom has been under water through much of February 2020. 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. 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. There is no mention of Natural England being consulted about the effect on local wildlife.

Suggested Modifications:

It's not a suitable site for development- no modifications can be made. Development would destroy wildlife, lose 'soakaway' land, add to pollution, add to traffic congestion and add surface water to an area permanently at risk of flooding.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609712>

Comment ID **HRU1109**

Site ref (if applicable): **LP0952**

Person ID: **1243872**

Name: **Ms Karen Forsyth**

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 plan seems to contradict Government policy on protecting green belt land, and safeguarding the countryside against urban sprawl. By building on the land in Greetland, not Elland, an historic and valuable natural habitat would be destroyed. This would radically change the environment, ecology and wildlife of the green corridor of Saddleworth Road. The housing proposed is inappropriate and out of proportion with what's already there. There is the flood issue. The land in question is listed on the local plan as 'a flood risk area' Due to the intricate underground system of natural springs - the Crawstone Clough watercourse. At the moment, my Mother's home adjacent to the field in question is suffering significant flooding in the cellar, due to high levels of groundwater. This has been going on for 3 weeks to date (22/2/2020). The

topography of the area, steep sided run-off to the valley below would have nowhere to go if the land was covered with hardcore. There are a number of ash trees on the sight and an ancient right of way across the field. As this semi-rural area has poor public transport, the increased volume of traffic would be too much for the roads to cope with. The extra cars would have a detrimental effect on air quality. The pedestrian footpath is only on one side of the road, and is narrow. I would say this is hazardous for children and mothers walking to and from the schools on Saddleworth Road.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

The information about the plan change has not been made widely available to residents. My mother is 81 and has not been informed of these changes by Calderdale Council. Any information we do have, we have had to search for. The website is not fit for purpose. It stalls, and dies. It is extremely difficult to find information and register comments. This will put many people off. It is very confusing and obstructive.

Suggested Modifications:

A radical re-think of the housing development Protection of the ecology and wildlife Impact on road infrastructure My Mother who is 81, has had 2 GP surgeries close on her within 12 months There are not facilities to support such a huge population surge. schools, GP's Serious consideration of the Flooding potential. implications for the air quality from increased traffic

Comments:

Additional Evidence Link:

Comment ID **HRU1114**

Site ref (if applicable): **LP0952**

Person ID: **1243145**

Name: **Mrs Chloe Smith**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

I CONSIDER ALL OF THE FOLLOWING OBJECTION POINTS TO BE RELEVANT FOR ALL OF THE PROPOSED DEVELOPMENTS IN THE GREETLAND AREA- LP0026, LPO177, LPO952, LP1625. The following points cover all four sites as they are in such close proximity to each other and the negative implications are the same for each site. The local plan does not comply with the National Planning Policy Framework, at the beginning of the policy the three overarching objectives are mentioned: a) an economic objective ; to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure; b) a social objective ; to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and c) an environmental objective ; to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

These three overarching objectives contain lots of points that the local plan fails to comply with. This greenbelt land is NOT the right type of land in the right place. The provision of the infrastructure will be considerably compromised by the local plan, the area cannot cope with increased volume of traffic on the roads. The local plan does not support communities health, social and cultural well being, by taking away an area of land that is used for walkers, children to get fresh air this is definitely the opposite. The health of the community will be compromised by the huge traffic pollution increase. It mentions 'open-spaces' in the social objective, the open-spaces in Greetland will be lost if the developments are to go ahead, thus the opposite of this point. The third objective mentions contributing to protecting and enhancing our natural environment. The local plan is on greenbelt land that would destroy the homes of the local wildlife corner, not protecting in any way! For these reasons, along with many more I do not consider the local plan to be sound or legally complacent in any way. I do not consider the plan to be sound and have the following reasons for my objections: -Greenbelt and wildlife -Pollution and traffic congestion - Flooding - Infrastructure

Greenbelt and Wildlife To quote the NPPF 136 Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified . I do not believe that the reasons for the local plan are exceptional circumstances and are definitely not justified or evidenced. This land should be protected for the reasons it was made Greenbelt land in the first place. This is a wildlife corner home to many different wildlife species. This is land used by walking groups and children, it is good for health and well being to walk in the open-air and with mental health issues on the rise it is vital that this area of free space is not lost. NPPF 174 174. To protect and enhance biodiversity and geodiversity , plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity⁵⁶; wildlife corridors and stepping stones that connect them; " By building on greenbelt land the local plan is not protecting or enhancing the wildlife-rich habitats that are contained on this fabulous land. To quote the NPPF 137 137- makes as much use as possible of suitable brownfield sites and underutilised land; Brownfield sites- There are plenty of brownfield sites in Halifax that need to be considered first, I have looked at the Brownfield Register and it is not updated, showing a lack of priority for this. I do not feel that the suitable Brownfield sites have been considered first. There is a demolished mill at the bottom of Saddleworth Road, surely this should be a site for development before Greenbelt land! Pollution and Traffic Congestion 180. Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment . The location at the moment is already horrifically congested. West Vale is a bottle-neck of traffic especially at peak times. The traffic pollution created by the extra proposed number of houses will most likely cause danger to health, especially to the children attending the Pre school and Infant school on Saddleworth Road. This goes against the governments strategy on air quality. Planning and flood risk 155. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere . The proposed area of development is on an area prone to flooding. The weekend of the 10 th February saw extensive flooding in this area. There is lots of photographic evidence to show that the proposed area for development will already be prone to flooding. Where will all this water go ? The extreme current weather conditions have already proven to have devastating consequences in Calderdale. Calderdale Council have declared a 'Climate Emergency' but then are planning on building houses on flood plains, this will increase flood risks in West Vale and Elland. This is ludicrous.

Infrastructure As there is only one main road in and out this is going to cause major congestion issues. The other roads into Greetland are often narrow and already very congested, such as in Norland. The proposed plans on site LP0026 will cause major issues given that already the road is very narrow and two cars have trouble passing each other as it is. If this is to be an access point for an extra 60-70 houses it will definitely cause more issues than it already does. Greetland is currently a village, not a town. There are not enough shops to deal with the amount of proposed houses. I am currently on a waiting list for the local dentist, there is already a waiting list pages

long. There is not enough space at the Dentist or Doctors to deal with this vast number of new residents. The local schools are also already full. This does not comply with the NPPF statement following - 94. It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. The local plan will therefore have a disastrous effect on the infrastructure of Greetland itself. The local bus service is currently inadequate for the area. I worry that when my son is of high school age he will be unable to get a place on a school bus, are there plans to expand this service? I do not believe that there is a shortage of houses in this area or an unemployment problem or an issue of homeless families? Greetland can not possibly cope with the demands and negative impact that these developments will bring on a village. I would like to see the four sites in the Greetland area be removed from the local plan. They do not comply with the National Policy Planning Framework and are not sound.

Do you consider the plan to be Sound?: **No**

Sound Reason:

I CONSIDER ALL OF THE FOLLOWING OBJECTION POINTS TO BE RELEVANT FOR ALL OF THE PROPOSED DEVELOPMENTS IN THE GREETLAND AREA- LP0026, LPO177, LPO952, LP1625. The following points cover all four sites as they are in such close proximity to each other and the negative implications are the same for each site. The local plan does not comply with the National Planning Policy Framework, at the beginning of the policy the three overarching objectives are mentioned: a) an economic objective ; to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure; b) a social objective ; to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and c) an environmental objective ; to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy. These three overarching objectives contain lots of points that the local plan fails to comply with. This greenbelt land is NOT the right type of land in the right place. The provision of the infrastructure will be considerably compromised by the local plan, the area cannot cope with increased volume of traffic on the roads. The local plan does not support communities health, social and cultural well being, by taking away an area of land that is used for walkers, children to get fresh air this is definitely the opposite. The health of the community will be compromised by the huge traffic pollution increase. It mentions 'open-spaces' in the social objective, the open-spaces in Greetland will be lost if the developments are to go ahead, thus the opposite of this point. The third objective mentions contributing to protecting and enhancing our natural environment. The local plan is on greenbelt land that would destroy the homes of the local wildlife corner, not protecting in any way! For these reasons, along with many more I do not consider the local plan to be sound or legally compliant in any way. I do not consider the plan to be sound and have the following reasons for my objections: -Greenbelt and wildlife -Pollution and traffic congestion - Flooding - Infrastructure Greenbelt and Wildlife To quote the NPPF 136 Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified . I do not believe that the reasons for the local plan are exceptional circumstances and are definitely not justified or evidenced. This land should be protected for the reasons it was made Greenbelt land in the first place. This is a wildlife corner home to many different wildlife species. This is land used by walking groups and children, it is good for health and well being to walk in the open-air and with mental health issues on the rise it is vital that this area of free space is not lost. NPPF 174 174. To protect and enhance biodiversity and geodiversity , plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and

locally designated sites of importance for biodiversity⁵⁶; wildlife corridors and stepping stones that connect them; " By building on greenbelt land the local plan is not protecting or enhancing the wildlife-rich habitats that are contained on this fabulous land. To quote the NPPF 137 137- makes as much use as possible of suitable brownfield sites and underutilised land; Brownfield sites- There are plenty of brownfield sites in Halifax that need to be considered first, I have looked at the Brownfield Register and it is not updated, showing a lack of priority for this. I do not feel that the suitable Brownfield sites have been considered first. There is a demolished mill at the bottom of Saddleworth Road, surely this should be a site for development before Greenbelt land! Pollution and Traffic Congestion 180. Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment . The location at the moment is already horrifically congested. West Vale is a bottle-neck of traffic especially at peak times. The traffic pollution created by the extra proposed number of houses will most likely cause danger to health, especially to the children attending the Pre school and Infant school on Saddleworth Road. This goes against the governments strategy on air quality. Planning and flood risk 155. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere . The proposed area of development is on an area prone to flooding. The weekend of the 10 th February saw extensive flooding in this area. There is lots of photographic evidence to show that the proposed area for development will already be prone to flooding. Where will all this water go ? The extreme current weather conditions have already proven to have devastating consequences in Calderdale. Calderdale Council have declared a 'Climate Emergency' but then are planning on building houses on flood plains, this will increase flood risks in West Vale and Elland. This is ludicrous. Infrastructure As there is only one main road in and out this is going to cause major congestion issues. The other roads into Greetland are often narrow and already very congested, such as in Norland. The proposed plans on site LP0026 will cause major issues given that already the road is very narrow and two cars have trouble passing each other as it is. If this is to be an access point for an extra 60-70 houses it will definitely cause more issues than it already does. Greetland is currently a village, not a town. There are not enough shops to deal with the amount of proposed houses. I am currently on a waiting list for the local dentist, there is already a waiting list pages long. There is not enough space at the Dentist or Doctors to deal with this vast number of new residents. The local schools are also already full. This does not comply with the NPPF statement following - 94. It is important that a sufficient choice of school places is available to meet the needs of existing and new communities The local plan will therefore have a disastrous effect on the infrastructure of Greetland itself. The local bus service is currently inadequate for the area. I worry that when my son is of high school age he will be unable to get a place on a school bus, are there plans to expand this service ? I do not believe that there is a shortage of houses in this area or an unemployment problem or an issue of homeless families ? Greetland can not possibly cope with the demands and negative impact that these developments will bring on a village. I would like to see the four sites in the Greetland area be removed from the local plan. They do not comply with the National Policy Planning Framework and are not sound.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

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 **HRU1117**

Site ref (if applicable): **LP0952**

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?: **Yes**

Sound Reason:

Risk of Floods's This terminology is used a few times on the proposals. I would suggest this is edited to read 'certainty of floods'. The areas closest to Black Brook on the flood plains have done exactly that for many years, more notably during the 2015 Boxing Day floods that blighted our region and during Strom Ciara on 9th Feb 2020. I have attached pictures for your reference of site number LP0177. The houses on Woodfield Grange stand very close to the flood plain as it is, I can only imagine the catastrophic damage caused to these houses and the families that live in them if the flood plain and surrounding hill side was to be built on. As stated in the NPPF paragraph 155. ' Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.' Building on sites such as LP0592, LP0026 and LP1625 would only worsen this scenario as these areas act as a natural soak away to rain fall and surface water. If these sites were to be built on, surface water would flow directly down on the flood plain, which is already stretched during heavy rainfalls. To give you an idea of the amount of surface water on the aforementioned sites please see attached photos looking out onto the field on LP0592 which were taken on 09/02/20 only 20 minutes apart. The first at 10:45am, the second at 11:05am. Note how the swell of water has increased on the field so rapidly in that time, and how quickly that water would drain away, down the hillside and down to the new proposed housing. From there flow down towards Woodfield Grange and carry on further to the neighbouring towns of Elland and Brighouse. From the NPPF- ' 158. The aim of the sequential test is to steer new development to areas with the lowest risk of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.' - Flood plains are labelled as such for a reason, they are there to contain flood water and any breached rivers and streams. To take this away would be detrimental to the neighbouring communities. The council, and developers have obviously underestimated the severity of the flooding in this area of Greetland. Greenbelt & Wildlife Corridor As a resident of Greetland my entire life I have always been aware of how lucky I am to live in an area full of green fields, farms and moorlands. It is certainly one of the main reasons Greetland is such a sought-after place to own a property and bring up your children. Parts of the sites considered for this development are classed as sensitive Green Belt areas, and if I may quote the Governments own NPPF, paragraph 133- -“ The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.” Taking these green areas away, not only goes against the government's policy by creating urban sprawl it also takes away the green and semi-rural characteristics of our village, not to mention the adverse effects the developments will have on local wildlife native to the area including herons, crested newts, bats and hedgehogs to name

but a few. Below is a paragraph from the NPPF- 134. Green Belt serves five purposes: a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; c) to assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. To build on site LP0592 would go against each and every one of these 5 purposes of Green Belt land. In reference to point 'e' I struggle to find the reasoning behind why available brownfield sites have not been considered for this local plan. I do understand that there is a housing crisis to address, and homes do need to be built but I feel that using Green belt areas- including flood plains- is a very poor judgement from our local Council. Infrastructure Aside from the fact this development is suggested for a known flood plain and green belt area, the volume of dwellings suggested across all four sites is overwhelming and disproportionate for Greetland as a village. 600+ houses on already one of the busiest roads in the area would just cause chaos for commuters, school drop off and collection as well potentially turning Sunnybank Drive into a rat run for frustrated drivers trying to access Rochdale road to avoid queues on Saddleworth road. At peak times this road can be very busy, especially as you get closer to West Vale traffic lights and passing the infant school. Adding (I estimate) 1200 cars to this scenario not only would cause peak time traffic to swell ten-fold but also become detrimental to the health and wellbeing of the children at the Sunnybank Pre School and Greetland Academy who would be subject to the car fumes and not to mention the danger that will be posed by the increase in traffic when crossing the road. Information from the World Health Organisation states; ' One reason why children are particularly vulnerable to the effects of air pollution is that they breathe more rapidly than adults and so absorb more pollutants. They also live closer to the ground, where some pollutants reach peak concentrations ; at a time when their brains and bodies are still developing.' As a mother of young children this subject is a major concern. West Vale is overwhelmed by traffic at all times of day, although the new eateries and drinking establishments have brought more business to the area and West Vale is a hive of activity it does mean most days there is slow moving traffic through both sets of lights. Adding to this volume would make West Vale virtually impassable at peak times. Another concern is services and amenities. The local schools are already at capacity as are the doctor and dental surgeries and would not cope with the demand from extra patients or students.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

little or no information about the proposals

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609722>

Comment ID **HRU112**

Site ref (if applicable): **LP0952**

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 gives insufficient regard to planning advice/regulations on environmental and social issues.

Do you consider the plan to be Sound?: **No**

Sound Reason:

The plan is not justified with regard to this site as the mitigations to the several constraints are quite inadequate. No proper account is taken of the significant flood risks and the need to preserve wildlife habitats, some of which are clearly acknowledged to be priority. The issues around traffic congestion and inadequate infrastructure are not dealt with at all.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

The only sensible modification is to remove this site from the plan.

Comments:

Additional Evidence Link:

Comment ID **HRU1123**

Site ref (if applicable): **LP0952**

Person ID: **1243884**

Name: **Mr Andrew Zoledziejewski**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

I am writing to object to the proposed plan to build on the following sites: "Ç LP0592 (New gate farm) "Ç LP1625 (Silverdale terrace) "Ç LP0177 (Ellistones place) "Ç LP0026 (Gate farm). GREENBELT. These areas are a natural soak and any removal of the floodplain in any capacity would be catastrophic further into West Vale, Elland and Brighouse if this was to disappear the significant loss of greenbelt is extremely worrying. These plots are in a semi rural location and any loss of this greenbelt would create urban sprawl and an extreme lack of green spaces for recreation and not to mention habitats for local wildlife. INFRASTRUCTURE. With Greetland already upto what many would say call full capacity anyway, I have no hesitation in saying that if 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 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 it simply will not work, it's barely passable at peak times at present. DISPROPORTION OF HOUSING SITES. The sheer scale and disproportion of the number of homes to build on a single stretch of

road is shocking. Why has such a large amount earmarked for such a concentrated area and Greenbelt area at that, when the Ward consists of greetland elland stainland and holywell green. We're supposed to be promoting development on Brownfield first yet in calderdale as a whole you're telling me that every single area of Brownfield has been exhausted and this is the only viable solution. I find that very hard to believe. I understand the need for housing development to be built at this time that I urge you to remove these 4 sites. As time goes on even without the housing development going ahead there is a significant increase in cars on a road. More extreme weather conditions which test our floodplains on a more regular basis. I really think you should reconsider as this will only be made worse and a scale I cant even imagine as the scenes of devastation from the floods on a few weeks ago in west vale and elland alone were beyond belief. When these Greenfield areas go they dont come back and a functional Greenbelt at that, which is what these 4 sites mention are. Please find enclosed photos of evidence of the flooding which occurred on the 09/02/20. And the need to preserve these natural soak always and floodplains. THE GOVERNMENT. The Government attaches great importance to greenbelt, the fundamental aim of greenbelt policy is to prevent urban sprawl by keeping land permanently open. Green Belt serves 5 purposes: a) to check the unrestricted sprawl of large built up area. ***this local plan merges greetland into surrounding areas. b) to prevent neighbouring towns merging into one another. c) to assist in safeguarding the countryside from encroachment. ***the local plans 600 proposed homes in semi rural locations which provide habitats for local wildlife. d) to preserve the setting and special character of historic towns. e) assist in urban regeneration, by encouraging the recycling of derelict and other urban land. ***not all brownfield has been exhausted in calderdale, not even close. Brownfield site just half a mile down the road in west vale, and former Hanson brickworks in elland yet they decide to build on a green belt floodplain.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Little or no information on proposals.

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609729>

Comment ID **HRU1124**

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's describes this land as being at risk of surface water flooding. It is devastating to see the land below this plot regularly flooded after short periods of heavy rainfall, which already threatens

adjacent homes and undoubtedly impacts further downstream in West Vale and Elland Bridge, a bridge which partially collapsed in the floods of 2015, costing 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 pollution from the current levels of traffic along Saddleworth Road is already considerable. This noise and air pollution would increase dramatically if these plans go ahead. The young children attending the primary school alongside this road would bear the brunt of this air pollution. This land is an integral part of the community at Greetland. To have green spaces within walking distance of our homes must be a priority for Calderdale Council. Using these spaces is essential for mental and physical wellbeing.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1135**

Site ref (if applicable): **LP0952**

Person ID: **956333**

Name: **Mr Michael Chantler-Dobson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

The Calderdale Local Plan for the proposed development within Greetland as listed is not legally compliant. Please refer to the details below relating to Government policy and framework relating to any proposed development on any listed greenbelt land or areas that are identified as flood plains or adding to flooding risk.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Flooding Chapter 14, paragraph 163 of the NPPF says: -“when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere”-Calderdale Council has failed to comply with policies on flood risk management. and environmental issues have been ignored by this Council. Under question is the Calderdale Council's Sustainability Appraisal process that supports the release of these development sites within Greetland and the further impact on flooding in these areas plus adding to the increased risk further into the River Calder from Greetland to Elland. Military support has been called into Calderdale on Saturday 15 th February 2020 whilst we brace ourselves for the onslaught of Storm Dennis and following the risk to life and devastation of the floods created by Storm Ciara last

weekend. The impact on the Calder Valley and the actual effects onto all of these development sites and subsequent changes to the landscape from this proposed development will add to further flooding and risk to life. The local and national news is covering the huge flood impact on our local community in Calderdale. Huddersfield Examiner Website Headline Story February 15 th 2020: -“Storm Denis Flood Fears In Calderdale, Prompts Army Response to Protect homes” | “Yorkshire Post Website February 15 th 2020 - “Armed Forces Arrive In Calderdale to SUPPORT flood response and Storm Dennis preparations” | The Belfast Telegraph February 15 th 2020: -“Army to Help - “Exhausted” Flood-Hit Residents in Yorkshire” (all relating to Calderdale) I again refer to the NPPF (paragraph 95) and highlight POLICY surround development proposals that could impact and adversely effect public safety and security and that of our defence: 'Planning policies and decisions should promote public safety and take into account wider security and defence requirements by: a) anticipating and addressing possible malicious threats and natural hazards... This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.' Clearly these proposed sites that flood regularly would be far more at risk due to the development within Greetland. The proposed development will change the natural ability for the land to direct and dissipate run-off water in, not extreme weather conditions, but in what we are now seeing as 'normal' challenging weather. Community The development will have a negative impact on the community. The entire Greetland area and greenbelt that is part of this proposed development would destroy a well-used piece of countryside that is enjoyed by a large majority of the local community. From the NPPF, it clearly says " | "To protect and enhance biodiversity and geodiversity, plans should: a) identify, map and safeguard components of local wild-life rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity" | "Clearly this development is at odds with this directive as it would damage local wildlife altering and negatively impacting biodiversity as well as habitats and the landscape. Alternative land in Stainland has been previously removed from the Calderdale Local Plan. This land in Stainland would have avoided all such negative impacts. Therefore, the Calderdale Local Plan and the local planning authority have failed to adhere to this legislative policy. Infrastructure The entire proposed development in Greetland under the Calderdale Local Plan of approximately 600 homes is simply unsustainable from a physical infrastructure perspective. The local schools are full, the local GP surgery is under massive pressure and the road infrastructure cannot cope with current traffic levels. The pressure on the traffic light controlled junctions within West Vale, with traffic feeding from Saddleworth Road, Stainland Road and Rochdale Road, is unsustainable and the aforementioned road structure is almost not fit for purpose with current traffic levels. When there are any issues on the M62 between junction 22 and 24 (fairly frequently) then these routes become completely gridlocked. An extra estimated 1200 cars just feeding into this from the Greetland sites as proposed with the Calderdale Plan will not only add increased congestion issues but also have a bigger impact on the environment and also increase the risk to pedestrian safety and wellbeing.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Given that the plan is in breach of the NPPF Policy, then if the "Duty to Co-operate" is a negative action by Calderdale Council, the Planning Department and the Calderdale Local plan, then "No" the plan does not comply. However, I feel this is such an ambiguous question that feels set out to intimidate and confuse local people and try to avoid objections. Might I also add that the lack of knowledge and communication to local residents about this "re-submission" of these lands within Greetland is not acceptable and should form a basis of an independent enquiry. The fact that a local group of residents has created a pressure group on social media, been featured on Regional TV News, been featured in Local Press and has organised

protests at the Halifax Town Hall and on the greenbelt in question, shows that feelings are very strong about protecting this land and making sure the environment and infrastructure in Greetland is not negatively impacted by this misplaced development proposal. It should also be noted that the fact these sites in "Greetland" are listed as "Elland" means their visibility when searching for them as "Greetland" causes further confusion and exclusion for some parts of the community. The way in which this has been handled clearly discriminates against parts of our community.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1140** 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 **HRU1144**

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 as -“Is this Sound” have very little meaning to general public. The use of acronyms, legal and planning -“jargon” make the plan far from user friendly. I do not know how the -“average lay person” can be expected to form a clear and sound argument. With this in mind I would say that the plan is not at all -“inclusive” and as such would exclude many people from being able to express their opinions. The Local Plan Website is extremely challenging to navigate, even for the most computer literate. The Council are showing very little Integrity, with local Councillors and the community not being kept up to date with what is happening. The council has also failed to listen to the community in compiling the plan. Residents were asked to comment on the removal of this site (LP0952) from the Green Belt in 2015 and then on its inclusion in the Local Plan in 2017. In both instances the overwhelming response from the community was that the land should not be in the Local Plan and should remain within the Green Belt. The sites in Greetland got the highest number of comments compared to the rest of Calderdale. Despite this, the Council, after initially removing the site, has now put it back into the Local Plan with no sound reasoning to support its actions. In addition, concern has been expressed by residents, as to why Greetland has been classified as part of Elland. Greetland is completely separate from Elland and it is misleading for the two areas to suddenly be -“consolidated” Residents of Greetland, on reviewing the Local Plan would have no reason to -“look under” Elland and would miss the opportunity to put forth their comments. Within the -“Settlement Hierarchy” the villages of Greetland/West Vale are not even listed, but the villages at either end of the Greetland (Holywell Green and Barkisland) are listed as Neighbourhood/Small rural areas. In connection

with this, there are also questions as to true increase in the amount of housing stock for the Greetland area. In the Councils calculation for -“Distribution of House Growth” (Table 3 Infrastructure Delivery Plan 2019) it shows Greetland, along with Elland, Holywell Green & Stainland to have a growth of 8.21%. However, if Greetland and West Vale are viewed on their own ; which they should be ; using the latest Polling District Figures, the increase in housing stock is around 20%. This is too much for a village of this size and with such limited infrastructure. The Council also appear to have -“gone against” a number of policies set out in the National Policy Planning Framework such as: When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations . The council have not demonstrated that development of this Green Belt will outweigh the harm. The Council have simply created a vague list of possible ways to -“mitigate” problems, most of which have no concrete or sound basis and in some cases are just totally incorrect. When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. The land proposed for development is used as a natural storage area which controls the amount of water going down to Black Brook and ultimately helps prevent even more flooding down the valley. In addition, the targeting of non Labour wards (both Liberal & Conservative) within Calderdale, whilst not illegal, is highly suspect at worst.

Do you consider the plan to be Sound?: **No**

Sound Reason:

LOSS OF GREEN BELT The site is currently designated as being in an area of Green Belt and in a recent survey it was seen to perform well in all areas apart from one. This area of Green Belt is also classified as being highly sensitive. In 2018 the Council deemed that this area of land was of such high importance, that it should be removed from the local Plan and yet now feels that the land is suitable for development. The council have not demonstrated any sound reason for this reversal, other than more land is required. The council have also failed produce any evidence, to show that all available Brownfield sites have been exhausted. Indeed, when challenged, they seem unable to produce any current information with regards to Brownfield availability. Their requirement to maintain a Brownfield site register with an annual update has failed (last update was 2018) so it is impossible to see what brownfield sites exist as potential alternatives. This site, currently provides a strong boundary which prevents urban sprawl. The developer (Keyland, Delivery Statement 2017) states -“the site does not serve any Green Belt purpose” ; “This is at complete odds to the Council Survey which clearly states the land performs strong in all but one area. Removal of this Green Belt land could, set the precedence, for removing even more of the land from the Green Belt and for development to take place all along the valley. Any development of this Green Belt area would have a major impact on the landscape and dramatically change the character of the locality forever. The development of this area would also mean a considerable loss of Open Space. The Council have stated in their report that removal of this land would have -“no loss/no impact” on the area. There seems to be no consideration that taking the Saddleworth Road Development as a whole, would mean a loss of nearly 25 hectares of open Green space which would have a detrimental effect on the local community. The area is regularly used by walkers, cyclists, horse riders and families. The area is becoming even more popular due to a number of initiatives by the owners of the industrial plant. The site has a public right of way to the west of it. Whilst the developers have stated that this will be retained, it does not take into account what effect the development would have on the character and tranquillity of this area. Walking through a housing estate is not the same as walking through untouched green belt fields. **FLOODING** The fields within this site all provide land for the run off from the Moorland at the top of the valley. This is clearly demonstrated when we have heavy rain fall. I have enclosed Photos taken within 30 mins of each other and it is clear to see how quickly the water builds up in the field. That water is still evident nearly a week later. Building on top of this natural soak away would leave nowhere for the rainfall to collect. Whilst the

developers may well be able to drain the sites successfully there appears to be not account taken of where that water will then go and what potential that has for flooding elsewhere in the valley. Given the recent catastrophic flooding the area experienced on February 9 th this year ; the second time in less than four years, this land needs to be removed from the Local Plan and allowed to provide a natural and necessary defence against flooding.

ENVIRONMENTAL HEALTH The Southern edge of proposed site is within 65 metres of Industrial Premises. In 2005 Planning permission on this site was refused, due to the potential effect of noise, dust and odours, from the industrial site, on the occupiers of the property. The council also went on to say that -“the land currently provides a good stand-off between conflicting land uses” In the original site report the Environmental Health once again would not support the site for residential development but has now changed their mind even though the situation is the still the same. This is concerning. The creation of so many houses is going to have a large impact on the amount of pollution created. The development, across all the 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 40mg/ limit, which has been set by the Council. More traffic will only increase these numbers which will be against their own targets.

INFRASTRUCTURE The MP for Calderdale, Craig Whittaker, has already expressed his concern regarding the “lack of a robust Infrastructure Plan” and how this will have a negative impact on the plan. The Infrastructure plan has no concrete solutions and does not address the many problems this development would bring such as lack of school places, both infant/junior and secondary, no NHS dentists and the pressure it will put on the local GP practice, to name but a few. The local school is unusual in that it split over two sites which are approximately half a mile apart. The intake is based on the proximity to the school site on Saddleworth Road. With the increase in housing on this road it could potentially mean that children living next to the School on Rochdale road could not secure a place. Potentially it could mean parents having to drive their children to schools away from the village thus adding to the congestion and pollution. In addition, other infant / junior schools in the area, West Vale / Holywell Green / Norland / Bowling Green are all either very close to or at capacity in all year groups from Reception to Year 6. Further afield, Elland / Lindley (in neighbouring Kirklees) are all at capacity. The public transport is very limited, buses to Halifax run once every hour, do not operate in an evening and have limited service at a weekend. The buses frequently miss and consequently you are unable to rely on them as a means of commuting to work. The main concern though is how the increase in traffic will impact on the area and the lack of any foresight as to what impact this have. The Site Report states that -“Mitigation measures are likely to be required at the Stainland and Saddleworth Road Junction” however it does not detail what the -“mitigation” will be. The Stainland Road / Saddleworth Road junction is very close to a second junction (less than 200 mtrs) for Rochdale Road / Stainland Road ; the existing problems at rush hour (morning and night) have been ongoing for many years and have been getting worse over the last 5 years. This is despite repeated - “mitigation measures” attempted by Calderdale council. These do not work. In fact a decision to allow the building of a Co-Operative store (with car park) which has an entrance on the junction, causes significant problems / near miss accidents. All major services run through the junction road surface (Gas / Water / electric). At times of major engineering work, the whole Stainland Road / Saddleworth Road junction is placed under 4 or now 5 way traffic control. It takes 30 minutes to travel less than 500 mtrs. It is also worthwhile noting that the M62 has just undergone extensive works to make it a -“smart motorway” which should help reduce congestion. However further schemes to convert areas to -“smart motorways”

is now on hold pending Government review into its safety. Using the Sustainability Appraisal Report it can be seen that this site has 11 uncertain impacts, 2 negatives and only 3 positives. When read in detail I would even question the validity of some of these - "positive" impacts and suggest they are more suited to uncertain or even negative. Given the amount of uncertain and negative points raised, I would question the validity of recommending this site as a suitable and sustainable area for development. Whilst we have been told that each site must have a separate and different submission, it has been nearly impossible to do this as each area of land is so interlinked. Indeed, to consider each site in isolation is not taking into account the full impact which developing over 24 hectares, with nearly 600 houses, will have on our local community and the environment.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

exclude from plan allocate across calderdale rather than a single aea. put some in labour councillors wards
build infrastructure - no details of this

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609737> ; <http://calderdale-consult.objective.co.uk/file/5609736>

Comment ID **HRU1151**

Site ref (if applicable): **LP0952**

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 Greetland will 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 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:

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 **HRU116**

Site ref (if applicable): **LP0952**

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/5594670>

Comment ID **HRU1164**

Site ref (if applicable): **LP0952**

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:

1) The Calderdale Statement of Community Involvement 2015 states: -“We need to be very clear about what we are asking people and we must be sure that people understand what will happen as a result of this engagement. This includes being clear about what decisions have been made, what have not, and who will make the final decision.” The proposed site is directly opposite my front door and a development on this site would have a huge impact for my family and our family life, yet to this day, I have never received a single piece of correspondence regarding this proposal, therefore lacking the clarity and involvement which the SCI calls for. With regards to the online portal, LP1625 is listed as part of Elland, which it clearly isn't. This is misleading and means it is easy for the site to be overlooked by residents who otherwise would want to state their objection. The process is far from 'simple' and is certainly not making it 'easy to get involved.' (SCI 1.3) 2) In the words of Esther McVey, Housing Minister's written policy on Green Belt land: -“Of course one of the most important environmental safeguards we have is the Green Belt. And I want to be clear that our commitment to this is as strong as ever, with any changes only happening in exceptional circumstances ; protecting the Green Belt goes beyond protection against development” In these circumstances, our Green Belt is not being protected. In the local plan, this site is being referred to as 'green field' when it is legally classed as 'green belt' and therefore should only be built on under exceptional circumstances and 'when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including :- making effective use of suitable brownfield sites.' (The Government White Paper -“Fixing our Broken Housing Market” Parag 1.39) There are other suitable brownfield sites in the local area which could be used and therefore would mean the 'right houses were being built in the right places.'

Do you consider the plan to be Sound?: **No**

Sound Reason:

Disproportionate amount of building in the Greetland area. As sites LP26, LP177, LP953 and LP1625 are so close in proximity they cannot be viewed individually as the overall impact of the local plan would be catastrophic to Greetland as a whole and the surrounding areas. Under the Calderdale Review of Polling Districts 2019, the number of properties per polling district is as follows: Greetland 1221, Sunnybank 505, West Vale 1119. This totals 2,845 properties. As LP0026, LP0177, LP0952 and LP1625 are all in immediate vicinity of Greetland and Sunnybank wards, combined this would see 543 additional new houses built in this distinct community on top of capacity allocated in the 2018 plan. As a percentage of the 3 wards this would see a disproportionate growth of 19% or 22.4% when adding in the 2018 site allocations. It could also be argued that the West Vale Ward is a community in itself (having its own primary school) which would take growth of Greetland and Sunnybank to 31.4% or 33.8% when including 2018 allocations. Previous potential sites which were considered and consequently rejected (report CC37) stated that it

would give a "disproportionate increase to Barkisland village". The increase based on the same dataset above would have been 16.6%. which is far less than the huge potential increase of up to 33.8% in Greetland. If this plan was to be passed, surely that would show a great inconsistency in policy and legality regarding planning applications. NPPF (para 133/ 134) also states that aim of Green Belt policy is 'to prevent urban sprawl' and 'to prevent neighbouring towns merging into one another.' The location of this proposed site would go against that ; there would be less clear boundaries between Greetland and Barkisland and the distance from local amenities would become an issue. The Inspector's letter of 16 th July 2019 to the Council notes (para 14) that: ' Local plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.' The site might be 'within a 0-15 minute journey of a town centre; is within 600m of Public Open Space; and within a 15 minute journey to a GP surgery' these simple benefits are irrelevant when it takes into account that the massive increase in traffic from the combined sites will increase travel time substantially, the local GP surgery is full and may no longer be within 15 minutes due to the increase in resulting traffic; that the majority of the public open space is actually part of the local plan to be built on; that the 'cleaner air' that Calderdale is fighting for will be heavily polluted by the increase in traffic and associated pollution from our already crumbling infrastructure. Where are the benefits? NPPF (para 94) also states: 'It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: 28 a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.' Greetland does currently have sufficient school places to meet the needs of the existing community but not for the needs of potentially 600 more families. I can clearly state that no consideration or preparation has taken place to resolve the issue of school places with the local schools and, as our immediate schools are academies, they cannot be forced to expand. The only benefits I can see are short-sighted ways of meeting council targets and lining the pockets of developers ; no benefits for the existing community or for the people who would live in these houses. Flood areas The NPPF states that planning policies and decisions should promote public safety and take into account wider security and defence requirements by: ' a) anticipating and addressing possible malicious threats and natural hazards... This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area .' As stated previously, LP0026, LP0177, LP0952 and LP1625 must be viewed collectively. Although the land cited on the local plan LP0952 does not flood to the same extent as other sites mentioned, this site soaks up a huge amount of surface water presently (see photo attached) and if land above LP0952 was built on, who knows where the water will go. We should not be building on high risk flood areas, or in extremely close proximity to high risk flood areas in Calderdale. We are not like the rest of the country! We are a high risk flood area, within a high risk flood area! The news today (15/2/20) is full of stories of flooding in our area with the army currently in Calderdale trying to prevent a repeat of the devastation from Storm Ciara last weekend. Labour Council leader, Tim Swift, is urging the Government to grant Calderdale urgent assistance by recognising it as a 'Tier 1' authority getting extra funding support because it is one of a small number of areas of the country at "sustained risk" of flooding.' Not a flood risk as stated in the local plan but a flood certainty- an area which will flood repeatedly and has over the last 5 years. Additionally, the NPPF states that, ' due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere .' The council's housing targets are not area specific so houses do not need to be built in Greetland on Green Belt in high risk flood areas. Due to the topography of our area ; sloping grassland, the trees, the flat flood plains and underground springs, we are not at threat of it happening as we are already

seeing localised flooding. Building houses on any of the flood plains mentioned in the local plan will only turn this into a catastrophic problem like other villages / towns in the Calder Valley are experiencing. Houses built in a high-risk flood area are not sustainable as the NPPF requires them to be. Millions of pounds are already being spent to aid flood prevention and there are numerous reports of houses /businesses not being able to get insurance due to risk of flooding. These are not the types of houses which Calderdale needs. This does not solve the housing crisis ; it just causes Calderdale more problems and costs more money. Conserving and enhancing the historic environment NPPF (para 187) 'predict the likelihood that currently unidentified heritage assets, particularly sites of historical and archaeological interest, will be discovered in the future.' Combined with site LP0177 and LP1625, this area is clearly of historical importance with archaeological finds on the adjacent site (post medieval stone skull) and historical buildings on LP0177 (18 th mill). Covering these fields in concrete and houses would not only have a negative impact on the lives of present day inhabitants but would do a disservice to the inhabitants of our past, destroying our local history irreversibly. Air pollution 'There are legal requirements and aspirational targets for levels of different air pollutants. The government recognises that protective health - and tackling air pollution - requires action, and is committed to improving the UK's air quality and reducing harmful emissions. The draft Clean Air Strategy, published in May 2018, sets out the case for action and demonstrates the government's determination to improve our air quality.' The proposed plan completely contradicts the Clean Air strategy, as the amount of land allocated on Saddleworth Road is disproportionate to the amount of land Calderdale has to allocate as a whole. The air pollution which will initially be caused during any building work and then from 600+ new houses and potentially an additional 1200 cars on the road also must take into account the pollution caused by the factories below this site in particular: Bosch Industrial Estate and Sonoco Factory. The overall air pollution will be harmfully concentrated on this one road, a road with an unusually high concentration of children so close by for so much time. This again appears to be a short term solution without really thinking about the long term impacts this will have on the health of the residents and more importantly, their children. Habitats and biodiversity To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity. 56; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation. 57; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity. 175. When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts) Living directly opposite this site, I am fully aware of how this area is full of natural diversity. I personally have heard owls, seen deer, herons, foxes, numerous birds of prey and even had a visit from a bat in the house. Although reports and assessments will be undertaken, no amount of adaptation or consideration for this wildlife would be better than simply just letting it be and not interfering. In the Calderdale Local Plan, land was removed from Stainland, which is far less sensitive, in terms of the risk development would pose to wildlife, biodiversity, habitat and landscape so if there is consistency in approach to planning, these sites should not be included in the Local Plan.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1169**

Site ref (if applicable):

Person ID: **1243910**

Name: **Mrs Diane Taylor**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

My understanding was that land was only to be removed from Greenbelt land in exceptional circumstances. There are no exceptional circumstances when there are undeveloped Brownfield sites in the area. I refer to the NPPF para 177 and the associated PPG in the sustainability of Greenbelt land.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Wildlife - To lose the greenbelt in this area would be extremely detrimental to the wild animals in the area. Once this land is gone it is gone forever. I often witness many species of wildlife including deer, bats, newts, hedgehogs, woodpeckers, foxes and owls. No mitigation can prevent the impact of urban sprawl and destroy their natural habitat. Loss of greenbelt - This land is precious to this community and the wider community from a visual, physical and emotional perspective. It is fundamental for our lifestyle to be in touch with nature to support both mental and physical health. We need areas like these that are free and easy to access. Living directly opposite this site you release how many people stop to photograph the view and have their lunch whilst enjoying its beauty. The community walk the paths along the river. Having somewhere away from noise, cars and pollution is crucial for our wellbeing. To take away these footpaths and open spaces is to deny our young people the opportunity to enjoy the countryside and open air in a safe environment. Infrastructure ; The sewer system is at capacity already. Greetland may have sufficient school places to meet the needs of the existing community but it certainly doesn't for 600 more families. The schools in this area are Academies and can't be forced to expand, this would mean parents using their cars to transport their children to school. The roads into West Vale are already unable to cope with the volume of traffic. All doctors and dentists are full. I have been living in Greetland for 11 years and travel to Ripponden to the doctors and have only just received a place at the dentist in West Vale in December. Air Pollution ; West Vale and Ripponden are already unable to cope with the volume of traffic during rush hours. Saddleworth Road outside the KS1 site of the Greetland Academy is an accident waiting to happen. Cars are double parked from the Nursing Home all the way up past Sunnybank Drive. The volume and speed the HGV travel up and down Saddleworth Road to the Sonoco factory and Bosch factory is already a high risk to children walking to and from school. More traffic on these roads would not only increase the risk of accidents but also the increase in air pollution would cause a serious health risk to the children both walking to school and those already at school playing in the grounds. The increase in air pollution ignores the recommendations of PHE. Children aren't just walking to Greetland school down Saddleworth Road but children walk to Brooksbank High School, the children are all walking where there will be a constant que of vehicles, where the pollution would be harmfully concentrated. Flooding ; Sites LP26, 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 LP0952 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 **HRU1189**

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 **HRU1191**

Site ref (if applicable): **LP0952**

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 There is absolutely no acceptable reason to build on protected green belt land when there is so much brownfield land available to use, not only in West Vale but in the whole of the Halifax/Calderdale area. 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. In my opinion to add extra traffic to this road would be irresponsible and dangerous. The extra traffic would also pose an extra road safety risk for the school and the residents of Saddleworth Road. The additional traffic would also create considerable extra pollution for the local people of the area including pupils at the school. 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.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. 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 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 **HRU1194**

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 involves allowing housing to be created on areas of Green Belt land. These areas should be and need to be protected to safeguarding future generations not destroyed in order to make profit. The plans give little regard to the value of open space and the impact this has on mental health.

Do you consider the plan to be Sound?: **No**

Sound Reason:

The areas for housing seem to sit within the Greetland area, there are no houses planned for the Stainland area. The impact that building these houses will impact on the local community for years to come. This is not a right here and now issue, this will be detrimental to the community and environment for years and years to come. Problems such as higher water, air and noise pollution, increased traffic, more fatalities, increased car dependency and dependency on roads and public transport that are already insufficient. Traffic congestion is getting worse and worse, on both Rochdale and Saddleworth roads. There is no way of making this better for current residents so building 600 houses is simply going to make this worse. Air pollution will affect residents massively. By increasing the number of cars and the number of car journeys, this is simply going to make a problem even worse. The schools and local Surgeries are already full, the sewers are already flooding. The areas around the four sites is Grade 3 agricultural land which, by Calderdale's own recognition, is an important commodity in light of climate change. The Woodland Trust has just supported the donation of over 100 trees that are recommended for this area. The fields have natural springs which run through the sites. By digging these up, in order to build houses, there won't be anywhere for this running 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:

There has been a severe lack in communication from Calderdale Council to residents. I only found out about the proposed plans through friends and Facebook. The council website is problematic to find your way around and can be difficult to navigate. I have made several attempts to submit my objections but have had to give up due to the website crashing or simply not working.

Suggested Modifications:

The four sites of LP0026, LP0952, LP0177, LP1625 be removed from the plan.

Comments:

Additional Evidence Link:

Comment ID **HRU1198**

Site ref (if applicable): **LP0952**

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?:

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 **HRU12**

Site ref (if applicable): **LP0952**

Person ID: **1238776**

Name: **Mr. paul holmes**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

I can't comment on this

Do you consider the plan to be Sound?: **No**

Sound Reason:

Whilst I appreciate the need for additional housing, this is a staggering amount of houses to be considering building in a small village (plus the other sides adjacent and opposite). There are two primary schools in the village, already full, one doctors surgery etc and although there is now a bit of a night life scene in the village, they are often people from elsewhere who then go home. The traffic is always very slow through West Vale as it is - this would be totally unworkable, especially with the large retirement living development also happening right in the heart of the village. I'm sure that everyone says the same when new developments are proposed, but really this is a totally inappropriate size of development for a village of this size and would be more suited to a town.

Do you consider that the plan complies with the Duty to Co-operate?: **Yes**

Duty to Co-operate Reason:

I can't comment on this

Suggested Modifications:

Significantly reduce the size of the proposed developments. 350 houses (houses, not people) is completely unworkable

Comments:

Additional Evidence Link:

Comment ID **HRU1210**

Site ref (if applicable): **LP0952**

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 the National Planning Policy Framework, especially, NPPF Para 177 and the associated PPG in the Sustainability of Greenbelt Sites. I believe the plan does not confirm to these points. According to the NPPF Para 143 under 'Proposals affecting the Green Belt' it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' The very special circumstances are non-existent in this site. This development would definitely contribute to future flooding in the area - the water from local springs has nowhere else to go apart from down this hill. 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:

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 £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. Adjacent Flood Plains 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:

It seems only by chance that Greetland residents have found out about the reinstatement of this plan after it was removed in 2017. There has been no correspondence or leafleting that I have seen.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1215**

Site ref (if applicable): **LP0952**

Person ID: **1243919**

Name: **Mrs Sara Cooley**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Building on flood plains and green belt land is not part of government policy as shown in the NPPF and PPG. The land in this proposed site is always sodden, even in the height of summertime. The recent Storm Ciara left the fields full of water as huge amounts of rain ran down the hill towards Black Brook. The current houses on Woodfield Drive narrowly escaped flooding inside their homes. Without the natural soakaway, these houses will almost certainly flood. The impact will be felt further downstream in West Vale, Elland and onto Brighouse. There is also the potential for changes to the water courses to cause flooding within the industrial units below this proposed site. The impact on wildlife will be dramatic. Herons, kingfishers, deer, badgers & bats are amongst many species who call the trees & fields around Black Brook their home. There is no doubt that many of the animals will leave their homes here permanently due to the disruption caused by construction of new houses. The proposed development will also affect local residents who will no longer be able to enjoy the tranquil, natural countryside on our doorsteps which is one of the reasons many people choose to live here. The proposed public recreation area shown on the developer's map will be unusable due to the water run off from the housing development.

Do you consider the plan to be Sound?: **No**

Sound Reason:

POSITIVELY PREPARED I do not believe the plan is positively prepared since local infrastructure, including but not limited to, schools, health care & local roads will not be able to cope with the increased population

in the local area. All local schools are currently running at full capacity and there is no consideration in the plan to extend current schools or build new ones. Traffic will be especially affected since the majority of journeys will be on or around Saddleworth Road. There are few employment opportunities available with walking distance of the proposed development so new residents will need to commute at peak time adding to the already gridlocked traffic in West Vale. This would mitigate the future gains made by the improvements to the A629. Saddleworth Road is also used by many large lorries travelling to and from the Sonoco Recycling plant, local quarries & Bosch factory among others. More traffic would impact these businesses. Public transport is very limited in the area with only 1 bus per hour between Halifax & Huddersfield in each direction. This is not enough to tempt people out of their cars for commuting. The increased in traffic, particularly gridlocked traffic, will negatively affect air quality. This is especially important as the local infant & junior schools are situated next to main roads. This contravenes government policy on air quality. This also contravenes Calderdale Council's commitment to preventing climate change. EFFECTIVE There is a disproportionate amount of development proposed for Greetland. At the last census Greetland had a population of 11,389 which means that, should all the proposed sites be added to the local plan, the population of Greetland will increase by at least 15-20% in a short space of time which is neither practical nor an effective way to provide sustainable development. Greetland has already undergone significant development in recent decades with the developments of Templars Close, Daleside, Trenance Gardens, High Meadows & Bankfield Grange to name a few. With each development residents see a change to the water courses down the valley. A development on the scale of that proposed here could be catastrophic for many residents locally and further afield in West Vale, Elland & Brighouse. NATIONAL POLICY As stated previously, building on flood plains and green belt land contravenes government policy. Green belt land should only be built on when all other brown field sites have been exhausted. There are many brown field sites around Calderdale which can be used though I understand developers are less likely to want to build on brown field sites as they are less profitable. There is a need for more social housing as well as affordable housing within Calderdale, perhaps the Council should consider taking on some of the brownfield sites to fulfill this need.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

I have had no formal communication from the council regarding these changes to the agreed Local Plan. Neither have I seen any publicly posted notices with the exception of posts from Calderdale Council on Facebook. I am concerned that there are many residents who are unaware of these proposed changes to the agreed local plan.

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1219**

Site ref (if applicable): **LP0952**

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 ££££££££££ and run. Does anyone actually care? Can we have answers please ? The DEFRA 25year plan states that "National flood management involves the use of a variety of measures including storing water on open land". NPPF 14 (157b) states that plans should work to safeguard land from development that is required or likely to be required for current and future flood management. The current policy and legislation on flooding states -“due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere. Chapter 14, paragraph 163 of the NPPF states: -“When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Boris Johnson has thrown housebuilding plans into confusion, by suddenly calling for an end to construction on flood plains. Around 9 per cent of new homes in England are built on land where there is a -“high probability” of flooding ; and a recent investigation found that 10,000 are currently in the pipeline. On the

campaign trail in flood-hit Derbyshire, the prime minister said: -“We've got to stop building on flood plains. We've got to stop building on areas which are vulnerable to flooding. Calderdale Council Planning Department has a duty of care to comply with current policy and legislation on flooding. Housing should not be built on sites such as this. Now is the time to step up ,stop building on flood plains and learn by past mistakes . Stop putting lives at risk. 2. Loss of Greenbelt , open spaces and Urban Sprawl The purpose of Green Belt policy is 'to prevent urban sprawl' and 'to prevent neighbouring towns merging into one another.' The location of this proposed site would go against that ; there would be less clear boundaries between Greetland and Barkisland NPPF Section 13 Protecting Green Belt Land Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: 1) to check the unrestricted sprawl of large built-up areas (2) to prevent neighbouring towns merging into one another (3) to assist in safeguarding the countryside from encroachment (4) to preserve the setting and special character of historic towns (5) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Calderdale Council, in its own evidence, concludes that this area of Green Belt performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt Brownfield sites should be developed first and sites with better infrastructure links. Avoid development upon flood plains. We are compounding the existing risk by continuing to build on flood plains. The more we pave over natural areas the easier it is for water to move across the land and into the rivers. Why have Brownfield sites been overlooked ? Planning framework states that sites to be removed from greenbelt should only be done so in exceptional circumstances. What are the exceptional circumstances ?.....I can't see any . The proposed development represents a disproportionate amount of new development in Greetland . Now is the time to step up, stop building on Green Belt such as this (which helps store water and protects land below thus helping in the prevention of rivers flooding) and learn by past mistakes. 3. Increased Traffic congestion and air pollution The area has not got the infrastructure to cope with any more traffic . West Vale is a bottleneck at the best of times . Saddleworth Road , Rochdale Road , Stainland Road are usually at a standstill. We've had 4/5 way traffic lights for weeks making the congestion worse than ever. Building these planned sites would be madness. It will be easier to go to Oldham shopping etc rather than sit in traffic trying to get to Halifax. Saddleworth Road has had a lot of roadworks recently , is this work that needed doing or is it paving the way for plans which haven't been passed yet? 600 new homes ...1200 plus more cars. I quite often see young children (vulnerable members of society) walking to school either with parents or with the Walking Bus maybe in the hope of getting some fresh air and exercise. Walking past queues of traffic with engines running is not a good way to achieve that. Even at school and pre school in the playground children are at risk from air pollution . 1200 plus more cars to add to the queues of traffic that line up outside the school on a daily basis. Air pollution causes heart problems /lung problems and others, is this what we should be doing to our children/grandchildren . A little further down Saddleworth Road is an old people's home...Woodfield Grange (more vulnerable members of society) Not to mention those with existing problems ...more strain on the NHS. 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 before it's too late for all of us .

Suggested Modifications:

LP0177...LP0952..LP0026.. LP1625 Don't build on these flood sensitive sites leave them as Green Belt .

Comments:

Additional Evidence Link:

Comment ID **HRU1220**

Site ref (if applicable): **LP0952**

Person ID: **1243596**

Name: **Mr Stephen Smallburn**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

No there was no further consultation when the site were re introduced into the plan

Do you consider the plan to be Sound?: **No**

Sound Reason:

The plan is unsound due to the following reasons The area is subject to regular flooding and any building would increase the risk of flooding to the existing properties by creating diversions to the flood plain. Increase in the number of properties from Brian Royd Lane to West Vale would result in a massive increase in traffic using Saddleworth Road which in turn would greatly increase both air and noise pollution especially around the school campus. Saddleworth Road is used as an alternative route into both Huddersfield and Halifax when there are problems on the M62. West Vale cannot cope with the volume of traffic currently so an influx of new houses would lead to major issues. The current amenities Doctors, schools, public transport are at breaking point The stretch of greenbelt along the river provides an area of natural beauty for the local community and is a haven for wildlife such as deer, foxes, herons, hedgehogs and frogs there would be lost if the developments went ahead. Further development would contribute to the urban sprawl and Greetland and Barkisland would soon become one and their individual identities lost.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

No as there was no further consultation prior the sites been re introduced into the plan. if the councils Economic Development plan is not sustainable then greenbelt will have been lost forever

Suggested Modifications:

Please remove the sites from the local plan.

Comments:

Additional Evidence Link:

Comment ID **HRU1237**

Site ref (if applicable): **LP0952**

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:

Site reference number (if applicable) LP0026 Legal Compliance Do you consider the plan to be Legally Compliant. No The plan is not legally complacent as does not comply with the NPPF Sound Do you consider the plan to be Sound. No 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 the plan to be Sound?: **No**

Sound Reason:

Site reference number (if applicable) LP0026 Legal Compliance Do you consider the plan to be Legally Compliant. No The plan is not legally complacent as does not comply with the NPPF Sound Do you consider the plan to be Sound. No 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 removing as it doesn't comply with the NPPF

Comments:

Additional Evidence Link:

Comment ID **HRU1250**

Site ref (if applicable): **LP0952**

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 **HRU1282**

Site ref (if applicable): **LP0952**

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/5609750>

Comment ID **HRU1287**

Site ref (if applicable): **LP0952**

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 **HRU1297**

Site ref (if applicable):

Person ID: **1243943**

Name: **Mrs Lucy Barrett**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

The process to object is neither easy or straight forward and the online forms and documents presented are complicated, lack clarity and make it challenging and off-putting to object. I feel that insufficient time has been allowed for full consideration of all the documents which need to be read to understand this issue fully and for objections to be made. In the CC37 considered and rejected report November 2019 - it appears that the main difference with those sites rejected and the sites LP0026, LP0177, LP0952 and LP1625 which were accepted were that they didn't have a developer on board! I feel very strongly that

because there is a local developer on board is the key factor on whether a particular location was included in the Local Plan. I note that in the Consultation comments there are already a set of plans from Barratt Homes for site LP0177. The interest and profits of prospective developers should not be a reason at all (never mind a key reason) for a site being included or excluded from the plan. I believe by splitting LP0026, LP0177, LP0952 and LP1625 as separate plans the full picture is being concealed, all sites are in close proximity of each other and can only be evaluated properly if considered as a whole

Do you consider the plan to be Sound?: **No**

Sound Reason:

Loss of Greenbelt I have lived in Greetland for 20 years, I have always owned a dog, therefore always used the public footpaths on all the sites in the proposed development plans. It is important to have this safe space to exercise for physical and mental wellbeing walking down Saddleworth Road with the heavy lorries hurtling down does not give you the same benefit as walking along side the river witnessing the heron and seeing my dog run through the fields and woods. The Duke of Edinburgh groups use these public rights of way as part of their expedition practices. To take away these footpaths is to deny our young people the opportunity to enjoy the countryside and open air whilst undertaking physical activity in a natural and safe environment, away from traffic, crime and pollution. To allow these developments would be to create urban sprawl, gradually encroaching on precious greenbelt Land that our community relies on for our wellbeing. There are many other sites, including disused mills, within the Calderdale catchment that do not sit within Greenbelt Land that could be considered for development before ruining for ever the Greenbelt Land in these sites. Increased risk of flooding I live at Sunnybank Lane and even the smallest amount of rain sends a torrent of water running down our lane. The effects of the flooding in Dec 2015 and more recently from storm Ciara are clear to see, the pictures and videos all over social media for anybody to review. Greetland is a high risk flood area within Calderdale. There are natural springs that pop up all over the hillsides of Greetland and added to this vast amounts of rainfall certifies the high risk flood area. We need the Greenbelt Land within these proposed development sites to act as a natural soak away and flood defence. Losing these flood plains would cause the water to simply be diverted elsewhere, causing certain flooding further down the area. The natural flood plains are nature's own defence mechanism why oh why would you take these away? The frequency of flooding is only set to increase with the change in weather conditions we are experiencing through global warming. The natural flood plains are therefore becoming increasingly important to our communities. To build on these sites would not only guarantee flooding issues and untold misery for residents and local businesses but cause increased expenditure for the council and local authorities as they will be required to assist with clean up operations, as has been seen over the last week or so in many parts of Calderdale. Loss of wildlife habitats There is an abundance of wild deer running through the fields, I witness the deer every time I walk my dog on the footpaths of the proposed sites. Along with the deer we have the beautiful kingfisher, heron, squirrels, pheasants, badgers, bats and foxes in the area. Building on the land would remove the habitats of this wildlife, therefore the wildlife would disappear. It saddens me to think my children would no longer witness nature in their community. Lack of infrastructure Greetland Academy is already full. The dentist in West Vale is full for NHS patients. The GP surgery often can't accommodate appointments. Adding an additional 600+ houses is just beyond belief on how the aforementioned will cope. The local roads are already riddled with potholes and are constantly patched. They are constantly under repair as the local drainage system is ineffective and causes regular surface issues. Add to that a level of increased traffic caused by the development as proposed and the road conditions will be worsened even further. Traffic congestion, air pollution and noise pollution Greetland and West Vale already suffer chronic traffic congestion, with the roads used not only by locals but also by the large wagons travelling to and from the Bosch Industrial Estate and the Sonoco factory. In addition, the road is used as a cut through from Ripponden and the M62. The village is already at breaking point at peak times and the roads cannot cope with the existing volume of traffic, let alone adding to that with these proposed developments. If you have a journey to Elland you need to allow

yourself and additional 10 mins to travel through Greetland and West Vale. Living at Sunnybank I see the traffic congestion at school drop off times. Saddleworth Road becomes a single lane road due to the parked cars on both sides. It becomes an obstacle course to get through and the large lorries that frequent the area make it dangerous for road users and pedestrians. Already the congestion is waiting to causing and accident and the safety of families is at risk. 600+ houses equating to on average 2 cars per family, this would be truly engulfing for the local roads. By increasing the congestion in the area, the air pollution will by default increase. This will especially have enormous impact on the young children attending the schools in the area. The playground of Sunnybank Pre-school runs adjacent with Saddleworth Road the children aged between 2 -3 would be playing out and being intoxicated with fumes from the number of passing vehicles. Additionally there would be an automatic increase of the level of noise pollution in the area.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609757>

Comment ID **HRU1305**

Site ref (if applicable): **LP0952**

Person ID: **1243963**

Name: **Mr Andrew Tweedale**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Please find the attached document titled "LP0952 Main Points of Objection"

Do you consider the plan to be Sound?: **No**

Sound Reason:

Please find the attached document titled "LP0952 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 "LP0952 Main Points of Objection"

Suggested Modifications:

N/A

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609762>

Comment ID **HRU1314**

Site ref (if applicable): **LP0952**

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 "LP0952 Main Points of Objection"

Do you consider the plan to be Sound?: **No**

Sound Reason:

Please find the attached document titled "LP0952 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 "LP0952 Main Points of Objection"

Suggested Modifications:

N/A

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609768>

Comment ID **HRU1315**

Site ref (if applicable):

Person ID: **1243900**

Name: **Mr Jacob Travis**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

The Local Plan does not address the NPPF particularly paragraph 177 and the associated PPG in the Sustainability of Greenbelt Sites. According to NPPF Para 143 it states 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' There are no VERY special circumstances for this site.

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREEN BELT This plot is in highly sensitive Green Belt and fulfills multiple criteria for Green Belt. It is necessary because it creates a barrier for the countryside and loss of this is likely to lead to further building

along the valley creating urban sprawl to Barkisland. Calderdale stated the Local Plan will only use 2% of the Green Belt but the proposed development in Greetland are 38% of our Green Belt which is ridiculously disproportionate. A recent report has not been made on available brown field sites, I believe the last one was in 2018, so I do not think they have exhausted these opportunities before looking at Green Belt land. In a recent meeting the Counsellor said it's difficult to get developers to use Brown Field sites 'because it was too messy' and developers prefer green field because it's easier and cheaper. These are not VERY exceptional circumstances. . URBAN SPRAWL / DISPROPORTIONATE The 2017 Calderdale Review identified LP0026 as having a 'high potential for unrestricted sprawl'. It is important we prevent Urban Sprawl as it separates our Green Belt from urban development and safeguarding the countryside from encroachment. As mentioned above the proposed developments will take away 38% of Greetland's green belt. Without this protection I am sure that 38% will increase over the year. Calderdale Council has declared a "Climate Emergency" and our green belt is a vital tool in the fight against climate change. Allowing the removal of green belt land is in direct contradiction to existing policies around climate change. Also looking at the inclusion of Elland, Greetland, West Vale and Stainland as one in the plan shows how this urban sprawl has already happened. Firstly I feel they should not be grouped together. Greetland is a village in it's own right and the assignment of this many houses to Greetland, not Elland and not Stainland and not West Vale is completely disproportionate and the council should consider adding housing to the plan for other areas. Building an additional 600 houses in Greetland is nearly a 50% increase to the number of houses here.

FLOODING THESE FIELDS FLOOD. They also act in absorbing much of the water that if developed on will merely flow down the hill and worsen the flooding in the valley bottom we have just seen. 2015 and 2020 have seen horrendous floods which is costing the council millions of pounds to sort out. Allowing development on this site will only worsen the problem, cause further flooding and increase the amount the council is going to have to spend on flood damages in the future years. Also the impact on flooded communities is horrendous, homes are wrecked, livelihoods destroyed and all this development will worsen the problem.

TRAFFIC CONGESTION / HIGHWAYS Greetland already suffers congestion problems and the traffic outside the school in particular is horrendous. There are local plans in place to reduce traffic in Sowerby Bridge by diverting traffic from Ripponden to Greetland along Rochdale and Saddleworth road before the addition all this proposed housing. This will lead to extremely unsafe roads, more potholes on our roads that are already in disrepair and increased travel times for local residents. This will also bring with it high levels of air pollution again contradicting the councils Climate Emergency policies. Small lanes such as Scar Bottom Lane simply can't cope with increased volumes of traffic. These are small country roads that are difficult for multiple cars to negotiate at the best of times.

WILDLIFE There is a huge amount of wildlife residing in the field around Greetland including bats, foxes, deer, newts, and badgers to name but a few. If we build on this land this habitat is lost forever.

ENVIRONMENTAL HEALTH / NOISE / AIR POLLUTION Calderdale council has declared a Climate Emergency yet we are hear discussing the removal of green belt land which will further add to this. I believe there is a minimum air quality level that we should not be breaching but this is not a target to work towards, it is a minimum level. The new buildings and traffic congestion will severely impact the air quality around Greetland reducing the quality significantly. The increased number of cars on the road and work ongoing will have a significant impact on local residents.

INFRASTRUCUTURE The local infrastructure in Greetland can't cope with the additional housing developments. My wife is pregnant and recent went to see her midwife who ordered a blood test be carried out, this needed to be done in the next 2 weeks. There were no appointments at the local surgery in West Vale for 5 weeks so she had to go the hospital in Halifax. The school in Greetland is also not able to cope with the increased number of students that these extensive developments will bring. Parents or children can't be expected to be travelling miles and miles to get their children to school. I don't see any plans from the council to develop the infrastructure further and if they do I presume they will have to build on Green Belt land again which will again be showing urban sprawl and further loss of the green belt in Greetland.

PLAN NOT RELEVANT I would suggest this plan should be revised following the outcome of BREXIT. The need for housing was built around an economic forecast for growth which is no longer relevant. Previous economic growth targets tied in to the number of new houses needed have not been

met and there is nothing to suggest that future levels will meet the forecasts. Therefore proposed housing levels and not accurate, the plan is not relevant and should be revised. I recently moved house within the Greetland area (Rochdale Road to Saddleworth Road) and did not find it difficult to find suitable housing in the area.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

There has been no effort to inform or consult with the local community

Suggested Modifications:

Site should be withdrawn from the local plan

Comments:

Additional Evidence Link:

Comment ID **HRU1328**

Site ref (if applicable): **LP0952**

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 LP0952 along with LP0177, LP0026 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 £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 **HRU1346** Site ref (if applicable):

Person ID: **1243837** Name: **Mr Graham Newton** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Not compliant with NPPF guidelines. There are no special reasons why this should be taken out of Green Belt. The council area contains many Brownfield sites which should be exploited first, the excuse that developers are not interested in developing the brownfield sites is not a valid reason to change Greenbelt. The upper part of this site forms a natural break forming an edge to the Greetland community. The site is full of natural springs and the land acts as a natural reservoir preventing fast runoff and therefore reducing the flow in the Black Brook. Development of the site would increase run off and would result in greater flooding in West Vale due to more rapid rise in water levels. The local infrastructure can not absorb this size of development, the local school is full as are the local doctors. The road system struggles with the present traffic numbers with long queues forming at the traffic lights in West Vale. Any extra traffic could cause stationary traffic to back up as far as the primary school on Saddleworth road with the consequent deterioration in air quality and increase in pollution next to the school playground This area forms part of a valuable wildlife area with a very diverse range of birds amphibians insects and plants. Woodpeckers, Owls, Herons etc all inhabit this area along with Kestrel and Buzzard.

Do you consider the plan to be Sound?: **No**

Sound Reason:

It does not follow the guidelines.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Poor publicity meant most people were unaware only being informed by word of mouth. This meant very little time to lodge an objection.

Suggested Modifications:

Removal of this site from the plan

Comments:

Additional Evidence Link:

Comment ID **HRU1352**

Site ref (if applicable): **LP0952**

Person ID: **1243872**

Name: **Ms Karen Forsyth**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

These proposals appear to contradict the National Planning Policy Framework document - Sustainability of Greenbelt sites-. Para 143, under "proposals affecting greenbelt". This states that "inappropriate development is, by definition, harmful to the green belt and should not be approved except in very special circumstances". The volume of development proposed, would destroy a valuable green corridor along the valley. This green belt space is valuable in preventing urban sprawl. The land is classed as Elland, when it is in fact Greetland, and not part of the urban town of Elland, which has already expanded to cover West Vale and parts of Greetland. The land proposed to be built on is valuable for safeguarding the countryside from encroachment of urban sprawl. The land is actively used as farmland, for sheep, cattle and horses. This historic and natural ecology should be cherished and protected. There is brownfield space at West Vale, after a mill demolition, that could be used for housing. The size of the development is inappropriate for the area. It is almost like situating another village, in a place where the current infrastructure would struggle to accommodate the rise in population. The green belt land is valuable for providing "green lungs" to help minimise the air pollution from the nearby M62. It is also a green space that everyone can use, for walking and recreation. It is vital for offsetting carbon, and so affecting climate change. Once gone, this vital green space would be gone forever.

Do you consider the plan to be Sound?: **No**

Sound Reason:

There is the flood consideration. Greetland is a steep sided valley with an intricate system of underground springs, running into the Black Brook river at the valley bottom. My mother lives adjacent to this field, and has flooding into her cellar from heavy groundwater. It has gone on for 3 weeks now. This would only get worse if the water course was altered, and surface water had no where to go, and the land was covered in hard core. It would be a catastrophic loss of natural habitat and ecology and wildlife. It is a valuable greenspace that is used by farmers and the public alike. It would be another example of loss of public

space, when all wisdom is encouraging people out into the countryside for health and wellbeing benefits. It would massively increase car use. As the semi-rural area has poor public transport, people would have to use cars. This would increase congestion, in an already struggling road system and increase air pollution. The huge increase in population would be a problem for infrastructure. Schools are full, GPs surgeries are closing and oversubscribed, and there are no facilities to support and new town. Shops and public services, etc.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

There has been little information given to residents. My mother is 81, and we have had to search for information about this ourselves. I don't consider this adequate, when the proposals would so fundamentally alter the environment. It is almost like planning a new town in a totally inappropriate area. The website is difficult and obstructive. It is not user friendly. Not everyone is computer literate, has access to smart phones or computers, so I think it is off-putting for people to use, and so many won't bother.

Suggested Modifications:

The plan needs a radical re-think. It would make environmental sense to use brownfield sites instead of destroying greenbelt land. The proposal is too huge. Too many houses, over too big an area. Serious consideration needs to consider the environmental impact, habitat loss, wildlife loss, the function of greenbelt land for improving air quality needs stating, the loss of trees, at a time of climate emergency. These proposals need more consideration of protecting, not destroying countryside.

Comments:

Additional Evidence Link:

Comment ID **HRU1356**

Site ref (if applicable): **LP0952**

Person ID: **1130385** Name: **Mr George Thomas Clayton** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

The Council's Sustainability Appraisal process to support the release of the site is inadequate. The site report states that the assessment of SA7 is 'Negative' and marked 'RED' commenting that "Overall the impact is negative as the site is greenfield and lies within flood zones 2 and 3". The site should be excluded ('Filtered' in Council terminology) on this conclusion alone, particularly within the wider context of the Council's recent declaration of a Climate Emergency and recent flood events. Further, the report does not grapple with the issue in the overall conclusions inadequately noting that "with regards to SA7 and flood risk, the impact is negative as the site is greenfield and lies within flood zones 2 and 3" with no specific mitigation measures identified. This does not come anywhere close to an adequate assessment to justify release for development. The Council have proposed a number of alterations to its Green Belt boundaries to simply meet an inflated housing target at the cost of great environmental harm. The NPPF is clear that Green Belt should only be altered in exceptional circumstances through the preparation or review of a Local Plan. Where it is necessary to consider revision of the Green Belt, this review should be robust in its

justification for any alteration ; which is critically missing. The critical importance of early and meaningful engagement and collaboration with communities in producing Local Plans, particularly where this involves altering Green Belt boundaries has not been undertaken as the site has been parachuted into the plan-making process during hearing sessions. This constitutes a serious breach of procedural compliance. A local pressure group has been set up at the last moment to attempt to deal with these issues locally and has attracted a significant amount of support. However, the community has not been given the opportunity to produce a Neighbourhood Plan. Neighbourhood Plans can be used by local people to positively shape development in their area, including establishing principles for how former Green Belt sites are developed.

Do you consider the plan to be Sound?: **No**

Sound Reason:

National policy is clear that Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan. The Calderdale Local Plan, which has suffered from a democratic deficit throughout its many iterations, sets a target for housing based on pre-Brexit demographic evidence of Objectively Assessed Need (OAN). This means that the Green Belt as designated in the current UDP has had to be reviewed. The OAN is far too great and as it relates to out-of-date population projections used in Strategic Housing Market Assessment (and update) that have been superseded by lower projections in more recent Office of National Statistics releases that would result in a much lower housing target and the reduce the need to release the number of Green Belt sites. Further, the ambitions of the Council for annual jobs growth over a 16 year period characteristic of a constant 'boom' inflate the requirement well beyond the realistic possibility of actual delivery. The NPPF sets out the aim of Green Belt policy which is -“to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”The NPPF explains that the Green Belt serves five purposes: (i) to check the unrestricted sprawl of large built-up areas (ii) to prevent neighbouring towns merging into one another (iii) to assist in safeguarding the countryside from encroachment (iv) to preserve the setting and special character of historic towns (v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The Council, in its own evidence, concludes that the overall parcel within which the site is located performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt but, most decisively, would see the coalescence of Greetland and West Vale and the deterioration of the identity of both places. This critically undermines the Council's Settlement Hierarchy. The most recent revisions to the Local Plan in response to the Inspector's letter include the addition of more Green Belt sites (including LP00952) for release, which represents further unsustainable development as a disproportionate amount of the new homes proposed are across just four sites in Greetland. Indeed, 1,041 additional units of the 1,708 on these new housing sites (over 60%) are proposed in the Elland area alone. There has been substantial development of land in both Greetland and Elland in recent years. This cumulative development means that the land at Ellistones Place is the only remaining parcel of the original Green Belt still in agricultural use. Development of the site would erode the visitor's understanding of the extent of the original manorial lands that Greetland covers. It is notable that the site was significantly waterlogged by storms in February 2020 alongside many others in the Calder Valley. The district is characterised by a very particular set of topographical constraints that are not replicated anywhere else in the UK, five towns are located in the valley bottom of the South Pennines. It is simply not sensible to allocate land, including a significant amount of Green Belt release, to meet inflated housing targets based on out-of-date household projections and ambitious and continual jobs growth. The housing target needs revisiting to model scenarios reflective of evidenced-based jobs growth (rather than ambitions), up-to-date household projections (including post-Brexit population projections) and the priority to contribute to sustainable development that does not harm the environment (including the Council's Climate Emergency

commitments). In short, the Local Plan has been overtaken by events both demographically, economically and environmentally. At this point, the Council is proposing to adopt a Local Plan that runs entirely against the corporate ambitions of the authority. It is simply the case that no plan at all (and reliance on the NPPF & NNPG to direct new developments, which would include the protection of sensitive Green Belt) would be better than the proposed Local Plan that is under examination. The Sustainability Appraisal for the Local Plan has not been mapped or measured. The benefits of, or the opportunities for, the provision of ecosystem services by the Green Belt land directly around the urban environment are unrecorded. Section 39 of the Planning and Compulsory Purchase Act 2004 states that a local authority exercising their plan-making functions must do so with the objective of contributing to the achievement of sustainable development. Action 5 of the EU Biodiversity Strategy to 2020 requires member states to map and assess ecosystems, whilst the Minister of State for the Environment reiterates the necessity to map and value the natural capital that make up ecosystem services, specifically in urban environments, in order to improve sustainable planning. Further, the NPPF sets out a presumption in favour of sustainable development and advises that the planning system should contribute to and enhance the natural and local environment by a number of measures that include 'recognising the wider benefits of ecosystems services'. The issues on the site flagged by the Council itself, particularly regarding traffic impacts and flooding serves to underscore that the proposals are not sustainable in NPPF terms. When the harm identified is taken into account the proposals do not amount to sustainable development. The site is unsuitable for development in accordance with national policy set out in the NPPF relating to Green Belt and Heritage Assets and recent planning case law determined by High Court Judgements relating to the siting of Listed Buildings. The proposals are not supported by Housing Infrastructure Fund (HIF) from Homes England and the inadequacy of existing infrastructure to accommodate this level of growth confirms that the proposals are unsustainable. This is outwardly recognised by the local Member of Parliament, Craig Whitaker MP, who would be expected to raise infrastructure concerns with the Secretary of State with regard to the proposed release of green belt, particularly in Greetland particularly given the lack of HIF. The Secretary of State has the power to issue a holding direction to prevent any further action in relation to the submitted local plan, including withdrawal of the plan, whilst he considers use of his intervention powers under section 21 of the Planning and Compulsory Purchase Act 2004 (-“the 2004 Act”¹). The function of the planning system is to facilitate sustainable development that makes a positive contribution to the environment. It is not the role of the Council to recklessly release demonstrably unacceptable sites within the Green Belt to meet a housing target. The Inspector's letter of 16 July 2019 to the Council notes (Para. 14) that "Local Plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits". This is the undoubtedly the case here. No sensible phasing options are proposed related to release of the most sensitive Green Belt sites upon the requirement to demonstrate a five year housing land supply even if the release could be justified. It is illogical to allocate Green Belt sites in Flood Risk Zones 2 and 3 for development before brownfield sites are fully exhausted. The immediate release of the site for development is simply not a sensitive approach to the release of Green Belt land even if it were to be appropriate. Later, the Inspector asked the Council to review the option of 'the supply of more suitable and available sites elsewhere' understanding this to be an option, however, the further work on the additional sites considered (incorrectly by the Council) to be 'suitable and available' are not, in fact, suitable and, in any case, it has been revealed that this option on the site is simply not sustainable and the proposal is unsound.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

The Local Plan proposals to release this site requirements relating to the release of the land from Green

Belt ARE not positively prepared, justified, effective or consistent with National Planning Policy Framework (NPPF) and accompanying Guidance (NPPG). The principal objections to the development of the site I have outlined are (but are not limited to): Out-of-date justification of housing requirement for Green Belt release Disproportionate amount of planned development. Adequacy of the sustainability appraisal. Implications of flood risk. Procedural and legal compliance issues. Lack of supporting infrastructure and funding. Demonstration of sustainable development. Given the distinct lack of soundness and legal compliance, the only modification I consider necessary is to remove the site from the Local Plan.

Comments:

Additional Evidence Link:

Comment ID **HRU1358**

Site ref (if applicable): **LP0952**

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 be publicised adequately.

Do you consider the plan to be Sound?: **No**

Sound Reason:

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 The site as a whole site soaks up rainfall and slows down the transit of water to the nearby Black Brook (river). The council has not adhered to NPPF 155 or NPPF 163 when including this site in the Local Plan. Building on this site will cause West Vale, Elland and Brighouse to flood and quickly. I attach a photograph showing surface run off at this site LP0952 following Storm Ciara. This run off only occurs when the land is already saturated with water having soaked up a significant amount of rainfall and easing the burden on the nearby water courses. If this land is built upon there will be shorter lag times between peak rainfall and peak river flow of the Black Brook and the River Calder. It will certainly cause floods at West Vale, Elland and Brighouse. The risks cannot be mitigated against with cash expenditure, or at all, and lessons need to be learned from the floods in neighbouring Mytholmroyd where the Environment Agency has spent (some may say wasted) Â£millions on flood defences and mitigation plans which do not work. Nature will not be tamed. 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.' Lord Shutt a local resident said in the House of Lords: "My Lords, I declare the interest that I live in Greetland in the Blackburn Valley, less than a mile from the confluence with the Calder Valley. I saw the floods yesterday; I saw the Black Brook rise and come over its banks, and I saw it flood into several fields in front of my house from my own front window. I saw the same thing on Boxing Day in 2015. I am well aware of how those floods seriously affected Sowerby Bridge, Mytholmroyd, Hebden Bridge and Todmorden, and that has happened again this time. A mere 38 years ago, when I happened to be mayor, I had to visit various people, while wearing my chain, who had been flooded, so it is nothing new that we have floods in the Calder Valley, particularly the upper Calder Valley. I note what the Statement said about the serious amount of money spent on flood protection, particularly in Mytholmroyd and Hebden Bridge. The upper Calder Valley is of course a place where we have steep valleys and no flood plains. Therefore, however good the work that will be done in the valley bottom, work has also to be done in the uplands. It seems to me that these things should go hand in hand, so we have to look very seriously at the uplands because the work that was done in the upper Calder Valley is seriously stressed now. I hope that is taken in. Living in Calderdale now, we are at the latter part of the local plan preparation process. A revised draft has been produced, consultations are taking place and an inspector has been appointed. Can the Minister assure me that an inspector looking at a local plan will look at the issue of houses being built on a flood plain? Some 600 houses are proposed in the Blackburn Valley. Will that be looked at in the next few weeks?" 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. 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. The site is not bordered by residential housing or industry contrary to the site report. I encourage the inspector to look at the site in person or via Google Earth for an accurate appreciation of the site. This site is the farthest away from established development and is a barrier to urban sprawl. It should be removed from the local plan.

Sustainability Appraisals The sustainability Appraisal for this site contains 11 'uncertain' outcomes. Basically the council doesn't know what the impact of building on this land will be but are prepared to allow building to occur nonetheless. This is unsustainable

Housing densities The housing densities at the Brighouse sites could easily be increased to absorb much of the housing requirement involving the Green Belt Land in Greetland. See NPPF paras 122 & 123.

Wildlife The site is home to bats, deer, foxes insects and other invertebrates. it is vital habitat that should be protected. It is a recognised wildlife corridor.

Infrastructure The roads cannot cope with the existing traffic and new development will make an already bad situation worse.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

The council has not cooperated with neighbouring councils.

Suggested Modifications:

Remove LP0026, LP0177, LP0952 & LP1625 from the local plan. Revisit the economic projections, increase housing densities in Brighouse.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609713>

Comment ID **HRU1364**

Site ref (if applicable): **LP0952**

Person ID: **953094**

Name: **Mrs Joanne Clayton**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

The Council's Sustainability Appraisal process to support the release of the site is inadequate. The site report states that the assessment of SA7 is 'Negative' and marked 'RED' commenting that "Overall the impact is negative as the site is greenfield and lies within flood zones 2 and 3". The site should be excluded ('Filtered' in Council terminology) on this conclusion alone, particularly within the wider context of the Council's recent declaration of a Climate Emergency and recent flood events. Further, the report does not grapple with the issue in the overall conclusions inadequately noting that "with regards to SA7 and flood risk, the impact is negative as the site is greenfield and lies within flood zones 2 and 3" with no specific mitigation measures identified. This does not come anywhere close to an adequate assessment to justify release for development. The Council have proposed a number of alterations to its Green Belt boundaries to simply meet an inflated housing target at the cost of great environmental harm. The NPPF is clear that Green Belt should only be altered in exceptional circumstances through the preparation or review of a Local Plan. Where it is necessary to consider revision of the Green Belt, this review should be robust in its justification for any alteration ; which is critically missing. The critical importance of early and meaningful engagement and collaboration with communities in producing Local Plans, particularly where this involves altering Green Belt boundaries has not been undertaken as the site has been parachuted into the plan-making process during hearing sessions. This constitutes a serious breach of procedural compliance. A local pressure group has been set up at the last moment to attempt to deal with these issues locally and has attracted a significant amount of support. However, the community has not been given the opportunity to produce a Neighbourhood Plan. Neighbourhood Plans can be used by local people to positively shape development in their area, including establishing principles for how former Green Belt sites are developed.

Do you consider the plan to be Sound?: **No**

Sound Reason:

National policy is clear that Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan. The Calderdale Local Plan, which has suffered from a democratic deficit throughout its many iterations, sets a target for housing based on pre-Brexit demographic evidence of Objectively Assessed Need (OAN). This means that the Green Belt as designated in the current UDP has had to be reviewed. The OAN is far too great and as it relates to out-of-date population projections used in Strategic Housing Market Assessment (and update) that have been superseded by lower projections in more recent Office of National Statistics releases that would result in a much lower housing target and the reduce the need to release the number of Green Belt sites. Further, the ambitions of the Council for annual jobs growth over a 16 year period characteristic of a constant 'boom' inflate the requirement well beyond the realistic possibility of actual delivery. The NPPF sets out the aim of Green Belt policy which is -"to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence" The NPPF explains that the Green Belt serves five purposes: (i) to check the unrestricted sprawl of large built-up areas (ii) to prevent neighbouring towns merging into one another (iii) to assist in safeguarding the countryside from encroachment (iv) to preserve the setting and special character of historic towns (v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The Council, in its own

evidence, concludes that the overall parcel within which the site is located performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt but, most decisively, would see the coalescence of Greetland and West Vale and the deterioration of the identity of both places. This critically undermines the Council's Settlement Hierarchy. The most recent revisions to the Local Plan in response to the Inspector's letter include the addition of more Green Belt sites (including LP0952) for release, which represents further unsustainable development as a disproportionate amount of the new homes proposed are across just four sites in Greetland. Indeed, 1,041 additional units of the 1,708 on these new housing sites (over 60%) are proposed in the Elland area alone. There has been substantial development of land in both Greetland and Elland in recent years. This cumulative development means that the land at this site is the only remaining parcel of the original Green Belt still in agricultural use. Development of the site would erode the visitor's understanding of the extent of the original manorial lands that Greetland covers. It is notable that the site was significantly waterlogged by storms in February 2020 alongside many others in the Calder Valley. The district is characterised by a very particular set of topographical constraints that are not replicated anywhere else in the UK, five towns are located in the valley bottom of the South Pennines. It is simply not sensible to allocate land, including a significant amount of Green Belt release, to meet inflated housing targets based on out-of-date household projections and ambitious and continual jobs growth. The housing target needs revisiting to model scenarios reflective of evidenced-based jobs growth (rather than ambitions), up-to-date household projections (including post-Brexit population projections) and the priority to contribute to sustainable development that does not harm the environment (including the Council's Climate Emergency commitments). In short, the Local Plan has been overtaken by events both demographically, economically and environmentally. At this point, the Council is proposing to adopt a Local Plan that runs entirely against the corporate ambitions of the authority. It is simply the case that no plan at all (and reliance on the NPPF & NNPG to direct new developments, which would include the protection of sensitive Green Belt) would be better than the proposed Local Plan that is under examination. The Sustainability Appraisal for the Local Plan has not been mapped or measured. The benefits of, or the opportunities for, the provision of ecosystem services by the Green Belt land directly around the urban environment are unrecorded. Section 39 of the Planning and Compulsory Purchase Act 2004 states that a local authority exercising their plan-making functions must do so with the objective of contributing to the achievement of sustainable development. Action 5 of the EU Biodiversity Strategy to 2020 requires member states to map and assess ecosystems, whilst the Minister of State for the Environment reiterates the necessity to map and value the natural capital that make up ecosystem services, specifically in urban environments, in order to improve sustainable planning. Further, the NPPF sets out a presumption in favour of sustainable development and advises that the planning system should contribute to and enhance the natural and local environment by a number of measures that include 'recognising the wider benefits of ecosystems services'. The issues on the site flagged by the Council itself, particularly regarding traffic impacts and flooding serves to underscore that the proposals are not sustainable in NPPF terms. When the harm identified is taken into account the proposals do not amount to sustainable development. The site is unsuitable for development in accordance with national policy set out in the NPPF relating to Green Belt and Heritage Assets and recent planning case law determined by High Court Judgements relating to the siting of Listed Buildings. The proposals are not supported by Housing Infrastructure Fund (HIF) from Homes England and the inadequacy of existing infrastructure to accommodate this level of growth confirms that the proposals are unsustainable. This is outwardly recognised by the local Member of Parliament, Craig Whitaker MP, who would be expected to raise infrastructure concerns with the Secretary of State with regard to the proposed release of green belt, particularly in Greetland particularly given the lack of HIF. The Secretary of State has the power to issue a holding direction to prevent any further action in relation to the submitted local plan, including withdrawal of the plan, whilst he considers use of his intervention powers under section 21 of the Planning and Compulsory Purchase Act 2004 (-"the 2004 Act")⁷. The function of the planning system is to facilitate sustainable development that makes a positive contribution to the environment. It is not the role

of the Council to recklessly release demonstrably unacceptable sites within the Green Belt to meet a housing target. The Inspector's letter of 16 July 2019 to the Council notes (Para. 14) that "Local Plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits". This is the undoubtedly the case here. No sensible phasing options are proposed related to release of the most sensitive Green Belt sites upon the requirement to demonstrate a five year housing land supply even if the release could be justified. It is illogical to allocate Green Belt sites in Flood Risk Zones 2 and 3 for development before brownfield sites are fully exhausted. The immediate release of the site for development is simply not a sensitive approach to the release of Green Belt land even if it were to be appropriate. Later, the Inspector asked the Council to review the option of 'the supply of more suitable and available sites elsewhere' understanding this to be an option, however, the further work on the additional sites considered (incorrectly by the Council) to be 'suitable and available' are not, in fact, suitable and, in any case, it has been revealed that this option on the site is simply not sustainable and the proposal is unsound.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

The Local Plan proposals to release this site requirements relating to the release of the land from Green Belt ARE not positively prepared, justified, effective or consistent with National Planning Policy Framework (NPPF) and accompanying Guidance (NPPG). The principal objections to the development of the site I have outlined are (but are not limited to): Out-of-date justification of housing requirement for Green Belt release Disproportionate amount of planned development. Adequacy of the sustainability appraisal. Implications of flood risk. Procedural and legal compliance issues. Lack of supporting infrastructure and funding. Demonstration of sustainable development. Given the distinct lack of soundness and legal compliance, the only modification I consider necessary is to remove the site from the Local Plan.

Comments:

Additional Evidence Link:

Comment ID **HRU1366**

Site ref (if applicable): **LP0952**

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 consultation process should have been publicised. The site sustainability reports are not fit for purpose and do not comply with NPPF.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Economy The housing 'need' advised within the local plan is based on flawed economics. Firstly the

migration projections within Turley's report for Calderdale Council: 'Modelling the Economic Implications of the Proposed Housing Requirement' pre date Brexit and its potential effects on trade, interest rates, inflation and crucially migration. There is a shortage of working age people nationally, in Yorkshire and in Calderdale, even if these homes are built there will not be enough 'workers' to fill them. The council was given the option by the Inspector of revising down its economic projections but instead chose to maintain them and allocate more housing to Green Belt sites. The very fact that Calderdale Council could not calculate its housing need based on its own projections first time around highlights how unsound their methodology is. Recent figures confirm that net migration is falling. This has been the case since 2015. Visit: www.migrationwatchuk.org/statistics-net-migration-statistics 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. Flooding 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

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 3 are marked Green, 2 are Red and 11 are yellow. The report has not been prepared properly for example Objective 9: TO PROTECT AND ENHANCE BIODIVERSITY AND GEODIVERSITY is marked as 'uncertain' yet the land is a wildlife corridor on the green belt. It goes without saying that it will negatively impact biodiversity. 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. 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. I attach a Green Belt site assessment carried out by Calderdale council demonstrating that this is a valuable piece of Green Belt.

Housing Densities The council could comfortably increase housing densities (NPPF paras 122 & 123) on other allocated sites and this this would protect this site. The housing densities should be increased elsewhere e.g. Brighouse sites. It is unsustainable not to increase densities elsewhere

Climate Emergency Calderdale Council has declared a 'Climate Emergency' yet wants to use Green Belt land for housing. The two concepts are mutually exclusive of one another. Green Belt Land stores CO2 and oxygenates the atmosphere.

Ecology/Wildlife This site is part of a Wildlife Corridor and if it is built on there will be loss of habitat for hundreds of species of animals and insects but most strikingly loss of habitat for bats, owls, deer, badger, fox, hawks etc etc

Infrastructure The local schools will not cope with extra headcount in the locality. There are not enough doctors, dentists, etc. The roads are clogged up as it is. Again see the sustainability reports, this is a rural site, the residents

will be driving, they will not be using public transport.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

There doesn't appear to have been any coordination with Bradford, Oldham, Rochdale Local Authorities

Suggested Modifications:

Remove LP0026, LP0952, LP0177 & LP1625 from the local plan. Carry out a new economic review of migration etc. Increase proposed housing densities at Brighthouse sites.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609774>

Comment ID **HRU1374**

Site ref (if applicable): **LP0952**

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 LP0952 along with LP1625, LP0026 and LP0177 together cover a massive stretch of naturally beautiful land in our local community. This land is classified as a 'most sensitive' greenbelt, please find evidence of this in the following link to the Councils Greenbelt Review: https://calderdale.gov.uk/v2/maps/green-belt-review?fbclid=IwAR0-YtEHRsU5_gSN2JMA4zPU97P0GPsWU0_lq263NGHjCx4_m66ibHv8vaQ 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 **HRU1380**

Site ref (if applicable): **LP0952**

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 consultation process has been shambolic, local residents were not informed properly of the revised local plan. The sustainability reports for the sites are not fit for purpose.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Sustainability 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. The sustainability appraisal for this site raises more questions than it answers. The report has not been positively prepared as a result. Of the 17 Objectives listed in the site appraisal 11 are 'uncertain', 2 are negative and 3 positive. The council can only list 3 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 3 'TO CREATE AND RETAIN HEALTHY VIBRANT AND INCLUSIVE COMMUNITIES' is marked as positive on the basis that it is 0-15 minutes from a town. This is simply not the case. Flooding According to the Environment Agency the Calder Valley is 'at unique risk of flooding'. The risks cannot be mitigated against, the only mitigation is to build housing which is not on steep sided valleys and which is away from water courses. This site is on the side of a valley, it has

a river, the Black Brook, running in the valley bottom. 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 Eustace 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 This site performs well against the five green belt purposes. I attach Green belt survey form. The Inspector will note that this form, unlike the sustainability appraisals, does not contain any uncertainties and the council has been able to answer questions pertaining to the land. 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. 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. 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 The site is part of a wildlife corridor and is home to bats which roost in trees on land adjacent to the site. 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:

Calderdale council appears to only have liaised with Kirklees council. It should have liaised with all neighbouring councils.

Suggested Modifications:

Increase housing densities in Brighouse to save Greetland Green Belt at LP0026,LP0177,LP1625 & LP0952. Remove LP0026,LP0952,LP0177 & LP1625 from the Local plan. Prepare a realistic post Brexit economic forecast. Increase housing densities at Brighouse.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609778>

Comment ID **HRU1388**

Site ref (if applicable): **LP0952**

Person ID: **1243971**

Name: **Mr Steve Hannah**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

The Local Plan does not address the implications of the National Planning Policy Framework, especially, NPPF Para 177 and the associated PPG in the Sustainability of Greenbelt Sites. According to the NPPF Para 143 under 'Proposals affecting the Green Belt' it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' The very special circumstances do not apply. Other reasons not legally compliant. Residents of Greetland not made aware of proposal and given opportunity to comment. The other reasons cited for excluding sites such as Green Belt, Access, Wildlife issues, Flooding constraints all apply to sites LP0026, LP0177, LP0952 and LP1625 and therefore these sites should equally be rejected from the Local plan. Importantly, I would also comment that plans LP0026 (The Gate Farm), LP0177 (Land adjacent Ellistones Place), LP0952 (Land at New Gate Farm) and LP1625 (Land to the west of Silverdale Terrace) should not be considered as separate proposals. They are so interrelated (sited within a small 1 km area along Saddleworth Road) that they can only be assessed fairly if considered as a whole. By splitting them out as separate plans the full picture is being concealed. My comments therefore are relevant to each of the plans LP0026, LP0177, LP0952 and LP1625 and should be considered as equal objections to all four sites.

Do you consider the plan to be Sound?: **No**

Sound Reason:

My main points of objection are as follows: Loss of Greenbelt land Increased risk of flooding Loss of Wildlife Habitats Lack of Infrastructure Traffic congestion, Increased air pollution Loss of Greenbelt Land Loss of amenity Loss of public footpath routes Creation of urban sprawl, Loss of wildlife habitat - foxes, badgers, bats, rabbits, deer exist within proposed development sites and adjacent areas The NPPF at a para 133 states that - "The Government attaches great importance to Green Belts" and at para 136 that - "Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified" At para 144 it further states - "local planning authorities should ensure that substantial weight is given to any harm to the green belt" and at para 145 - "a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt" Building on these sites is contradictory to all of these statements. When each of the 4 sites are reviewed together a large and disproportionate area of open space would be lost to this small community. At para 137 the NPPF states 'Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. 'I do not agree that the authority in this case has satisfied these conditions. There are many other sites, including disused mills, within the Calderdale catchment that do not sit within Greenbelt Land that could be considered for development before ruining for ever the Greenbelt Land in these sites. Increased risk of flooding Para 155 of the NPPF states that 'Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas of highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere 'Losing the fields will reduce the potential for water to be slowed down before it enters the river. Run off will increase and the rate

water reaches the river/flood plain will increase therefore increase the frequency and severity of flood (which it already does) ; see images attached. Loss of Wildlife Habitats Para 177 NPPF states that ' The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site'. I would argue that building on the land which is included in these proposals will be extremely detrimental to the wild animals within the area.No mitigation can prevent the impact of urban sprawl and the destruction of their natural habitats. Lack of Infrastructure The local schools are already full.The local dentists have long NHS waiting lists.The GP surgery is full and often can't accommodate appointment requests.Adding an additional 600+ houses and the associated increase in residents is simply unsustainable. The existing drain system cannot cope with rain water at present and raw sewage is regularly seen entering fields and the Black Brook stream when it rains. The sewers also regularly contaminate the footpath which runs along side the footpath below the proposed development sites. Traffic congestion, air pollution and noise pollution Greetland and West Vale already suffer chronic traffic congestion, The village is already at breaking point at peak times and the roads cannot cope with the existing volume of traffic, let alone adding to that with these proposed developments. At school drop off times Saddleworth Road becomes a single lane road due to the parked cars on both sides.It becomes an obstacle course to get through and the large lorries that frequent the area make it dangerous for road users and pedestrians. I fear for the lives of the children trying to get to school daily.. Increased air pollution More houses, more people, more cars = more air pollution. Less flora to with the loss of fields/trees further compounds the negative impact of increase emissions/pollution.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

retain green belt do not develop

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609786>

Comment ID **HRU1399**

Site ref (if applicable): **LP0952**

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:

I found out about this via Facebook!! I don't recall receiving anything via the post or from our local councillors. Hardly any community involvement!!

Do you consider the plan to be Sound?: **No**

Sound Reason:

My family and I moved to Greetland because we fell in love with it's green beauty and views, being semi

rural, the nature walks outside our front door and the kids loved the fresh open air. My objections are:
Loss of Greenbelt: Land is precious and should be protected. Loss of greenbelt would have a huge impact on the local wildlife and the local residents and their well being! The loss of greenbelt would lead to a huge increase in urban sprawl! Flooding: The proposed plan is for high rise flood areas and any development and loss of the fields, which soak up rainfall and spring water, will be detrimental to houses and businesses in and around West Vale! This would also impact on surrounding areas around the Calder such as Brighouse and Mirfield. Areas that have had development on flood plains have proven to be a huge issue over the last couple of weeks. Surely this is proof that building on flood plains is not the right solution for the housing issue. Infrastructure: Greetland is a village not a town and will not cope with 600 new homes, such as the doctors (waiting times are already unreasonable), school (class sizes already at the top end) and dentist (only one current local NHS dentist). The congestion of cars will reduce air quality and therefore the health of our future generation will be in jeopardy. The NPPF policy clearly states that flood plains should not be built on, Greetland/West Vale is a flood plain therefore the policy is not being adhered to. Wildlife: The community enjoys the local wildlife of many species. Some are protected, ie bats, deer, herons, owls etc. To remove their livelihoods would be a travesty! Air Pollution and Traffic: West Vale/Greetland is in a valley and therefore traps fumes from traffic. Increasing the amount of traffic via these proposed developments would cause ill health to many people, children and the aged. Currently West Vale cannot cope with the amount of traffic travelling through, as 4 directions of traffic flow through.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Brownfield sites should be considered not flood plains!

Comments:

Additional Evidence Link:

Comment ID **HRU1400**

Site ref (if applicable): **LP0952**

Person ID: **1243841**

Name: **Mrs Helen O'Hara**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

The duty to cooperate has not been complied with (see below). The consultation process has not been publicised by the council to local residents in a timely and efficient manner. The NPPF has been largely ignored. The Sustainability Appraisals for sites LP0026, LP0952, LP0177 & LP1625 have not been prepared properly and too many questions remain unanswered.

Do you consider the plan to be Sound?: **No**

Sound Reason:

The Housing Requirement is overstated in the Local Plan. The housing requirement calculated in the

Calderdale Local plan is significantly overstated. The Council relies on the Report of Turley: 'Modelling the Economic Implications of the Proposed Housing Requirement'. This report is unsound. It projects that Calderdale will create a significant number of jobs over the next 15 years, these jobs need workers to fill them and the workers themselves will of course need homes. The resulting projected housing requirement is incorporated in the Local Plan. We are told the jobs will be filled by migrants etc and Turley advise that Calderdale will experience migration numbers above the historical average. Turley relies on data from 2014 which is before a referendum on the UK's EU membership was even contemplated. The historical average relied upon by Turley includes migration as a result of the UK being an EU member state and its participation in the EU's core principle of free movement of people. The EU is an economic trade block with a population of circa 400,000,000 people which now the UK is no longer part of. Free movement of people ends in December 2020, access to workers will be significantly reduced as a result. In any case, according to migration watch net migration into the UK has fallen since 2015: : www.migrationwatchuk.org/statistics-net-migration-statistics. The ONS figures confirm that UK birth rates are falling. The UK's demographic is changing, there are more retired people in the population, less workers. Even if Calderdale experiences migration at levels at the historical average, there will not be enough workers to fulfil Calderdale's unrealistic economic aims. It is only by unrealistically projecting migration levels above the historical average that the plan can be taken seriously. Turley's methodology is flawed, all the objective data tells us that migration levels will drop. In addition, Government is introducing a point based immigration system and low skilled workers will face difficulties in obtaining visas according to the Home Secretary, Priti Patel (The Times 20/02/2020). There is already a national shortage of workers. there will not be enough workers to fill the homes Calderdale wants to plan for, therefore the plan is unsound. The council got its maths wrong when the first incarnation of this plan was submitted to the inspector, hence the need for more sites to be allocated now. This is evidence in itself that the council is unable to properly plan and strategise. (UN)Sustainability. Calderdale Council has prepared sustainability report for this site. The report is unsound. The sites are rated on a traffic light system Green (Positive), Red (Negative) & Yellow (Uncertain). For 'uncertain' please read: WE DO NOT KNOW WHAT WILL HAPPEN. This site, LP0952, has been assessed against 17 Objectives and the results are: 1 x n/a 3x positive 2x negative 11x uncertain The Council does not know the answer to 11 of the 16 objectives which relate to this site. That's 68.75% of the objectives being uncertain. This is not good enough, the council is promoting the development on land when it does not know what the impact of that development will be. The answer should never be 'uncertain' more questions should be asked until an answer, be it positive or negative, is arrived at. E.G. This is a proposed residential housing site - it will not create a sustainable employment opportunities so Objective 15 should be deemed as a negative. This is unacceptable. The plan is unsustainable. There are too many unknowns for this site. Flooding The Black Brook river flows to the south of this sloping green belt site. The Calder Valley and Calderdale experience significant flooding regularly and a reported £40M has been spent in attempts to mitigate these issues without success: See Storm Ciara/Mytholmroyd This site acts as a natural water tank holding countless gallons of rainfall and releasing it predictably and slowly into the Black Brook. If this land is built upon it will increase surface run off, increase water transit speeds and increase peak water volumes in the Black Brook itself. West Vale, Elland and Brighouse will flood. George Eustice MP, the DEFRA Secretary wishes to encourage the use of natural flood mitigation techniques and to retain natural flood plains to reduce peak river flows: Speaking on BBC Radio 5L 22/02/2020 at 08:08 hrs. This plan goes against the aims of the NPPF at paragraphs 155 & 163 and elsewhere. It is also against national policy as described by George Eustice MP. Mitigation measures will not succeed. This land is unsuitable for development. Green Belt Chapter 13 NPPF deals with Green Belt planning policy and has not been followed by Calderdale Council. Brownfield sites should be considered first although Calderdale Council does not appear to have considered any Brownfield sites. There is no Brownfield register available see para 119 of the NPPF. There are countless Brownfield sites within Calderdale which are suitable for housing. The council has failed to demonstrate that Exceptional Circumstances exist so as to develop the Green Belt at this site. I attach a Green Belt Site Survey Form for this site which demonstrates that the land performs a valuable function in its existing state. The site acts as

a Green Belt boundary site to restrict urban sprawl. Development of this site would mean the merge of Greetland with Stainland and Barkisland. 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 and to save the Green Belt see NPPF paragraphs 122 & 123 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. Retain the Green Belt.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609789> ; <http://calderdale-consult.objective.co.uk/file/5609739>

Comment ID **HRU1405**

Site ref (if applicable): **LP0952**

Person ID: **1243882**

Name: **Mrs Madeleine Stirrup**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

The plan is misleadingly called in Elland, when it is in Greetland. Elland is a town, Greetland is semi-rural. Over the years since 1965, when I and my family moved here, we have watched the encroachment of building creep from Elland, West Vale and Greetland until they are almost merged into one urban sprawl and the green spaces between them get squeezed more and more, and vital countryside is lost forever. The Government is supposed to be protecting Green Belt land and habitat. This proposal seems to go against Government guidelines on only using Green Belt land under special circumstances. I don't know of any special circumstances relating to this plan. I am sure there are underused brownfield sites around the area that could be considered. This would not have such a detrimental impact on the ecology and wildlife of our precious countryside.

Do you consider the plan to be Sound?: **No**

Sound Reason:

The plan to put houses on land already listed as a "flood-risk area" is reckless. Especially at a time when so

many homes in the district suffer flooding. My home, adjacent to the site, at present, has floodwater coming into my cellar. A result of groundwater flooding, and the high water table after the recent heavy rains and storms. This area has a complicated underground spring system. These springs are unpredictable, especially if interfered with. The building of homes on land that has high water run-off to the valley below, would be disasterous, and the inevitable flooding would be totally predictable. The field has a public right of way across it. It also has ash trees. These are valuable, irreplaceable and rare. The farm land is in active use, for sheep, horses, and cattle. The green belt land provides a vital space between urban development and it is important for protecting the countryside. It is used by the public, walkers, cyclists, horse-riders, families with children, enjoying being in nature. Again, the Government is encouraging the public to get into the countryside to improve health and wellbeing. It would be disasterous if this was taken away from public use. It provides carbon off-set, by cleaning the air. The traffic fumes locally and the nearby M62 would be worse if trees and green habitat are lost. At a time, when we have a climate emergency, more care and consideration should be taken to protect our wild spaces, and wild life, which has declined so rapidly in recent years. The size of the development proposed, is not sustainable. The increase in car usage would be a nightmare in roads already congested. There would be an inevitable increase in air pollution, right near the Schools in Saddleworth Road. There are already a lack of GPs, and there are not enough public services to deal with the huge increase in population.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

I have received no information about this proposed development from Calderdale Council, despite living next to the field in question. I have had to search myself to find out about it. I am 81, and I have found the website very difficult to use, and to locate the information I needed, and to add my comments. It seems unnecessarily complicated and designed to put people off.

Suggested Modifications:

The plan needs to be smaller, more in keeping with the area. Serious consideration needs to be given to the environmental impact, of habitat loss and the impact on wildlife. Green Belt land that is protected should stay protected.

Comments:

Additional Evidence Link:

Comment ID **HRU1409**

Site ref (if applicable): **LP0952**

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:

Do you consider the plan to be Sound?: **No**

Sound Reason:

I consider that to build houses in this area would be very detrimental considering that the area is subject to extreme flooding as enlightened by recent heavy rain. I would doubt that people, especially those new to the area, would be able to find insurance. The effect of pollution in the surrounding area would be devastating, especially upon the pupils of the schools which sit in the middle of the area, which would be caused by all the extra traffic. The extra traffic brought about by hundreds of new residents would have a profound effect on the village which currently struggles to cope. It is already made worse when the M62 motorway is closed. The areas infrastructure is struggling to cope with long waiting lists at doctors, schools, pharmacies etc. The effect on wildlife would be devastating. In summary these areas of Greetland would be totally unsuitable for houses built upon.

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 **HRU1420**

Site ref (if applicable):

Person ID: **1243823**

Name: **Miss Alison Thelwell**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

I strongly object to this proposal on the grounds of A. The increased traffic and noise pollution which will be generated. We are currently about half way through gas repair works at one of the key crossroads in west vale and at all times of the day traffic heavily builds up. This is an indication of how congested the area will become on a daily basis. At the other West Vale crossroads turning from the Elland direction towards Halifax is already difficult sometimes with just one car moving through the lights in time and this goes on to strain the rest of the road network. I believe it was considered a few years ago that it wouldn't be possible for a second filter lane to be created to ease congestion so this will be something which will only become an even greater problem. B. The newly generated traffic from the proposed site could lead to Sunnybank road becoming a rat run as commuters use it to avoid one set of traffic lights on the way to Halifax. C. Our current Schools are already at full capacity, how will it they handle the increased population? Our current schools cannot surely handle this increase. Greetland on its own is only a small village and cannot be expected to cope with this. D. The lower grounds of the village are very well known to become flooded during spells of bad weather. This has been well publicised this month alone. Removing much needed green belt land will no doubt push the problem elsewhere. We need the open fields to soak up excess rainfall and act as a natural flood defence system. Tarmaced housing estates in its place will lead to catastrophic consequences in this situation. E. The area has current derelict brown field sites. Why cannot these be considered as potential sites which will improve the area and in turn save our green belt land.

Do you consider the plan to be Sound?: **No**

Sound Reason:

I strongly object to this proposal on the grounds of A. The increased traffic and noise pollution which will be generated. We are currently about half way through gas repair works at one of the key crossroads in west vale and at all times of the day traffic heavily builds up. This is an indication of how congested the area will become on a daily basis. At the other West Vale crossroads turning from the Elland direction towards Halifax is already difficult sometimes with just one car moving through the lights in time and this goes on to strain the rest of the road network. I believe it was considered a few years ago that it wouldn't be possible for a second filter lane to be created to ease congestion so this will be something which will only become an even greater problem. B. The newly generated traffic from the proposed site could lead to Sunnybank road becoming a rat run as commuters use it to avoid one set of traffic lights on the way to Halifax. C. Our current Schools are already at full capacity, how will it they handle the increased population? Our current schools cannot surely handle this increase. Greetland on its own is only a small village and cannot be expected to cope with this. D. The lower grounds of the village are very well known to become flooded during spells of bad weather. This has been well publicised this month alone. Removing much needed green belt land will no doubt push the problem elsewhere. We need the open fields to soak up excess rainfall and act as a natural flood defence system. Tarmaced housing estates in its place will lead to catastrophic consequences in this situation. E. The area has current derelict brown field sites. Why cannot these be considered as potential sites which will improve the area and in turn save our green belt land.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

I strongly object to this proposal on the grounds of A. The increased traffic and noise pollution which will be generated. We are currently about half way through gas repair works at one of the key crossroads in west vale and at all times of the day traffic heavily builds up. This is an indication of how congested the area will become on a daily basis. At the other West Vale crossroads turning from the Elland direction towards Halifax is already difficult sometimes with just one car moving through the lights in time and this goes on to strain the rest of the road network. I believe it was considered a few years ago that it wouldn't be possible for a second filter lane to be created to ease congestion so this will be something which will only become an even greater problem. B. The newly generated traffic from the proposed site could lead to Sunnybank road becoming a rat run as commuters use it to avoid one set of traffic lights on the way to Halifax. C. Our current Schools are already at full capacity, how will it they handle the increased population? Our current schools cannot surely handle this increase. Greetland on its own is only a small village and cannot be expected to cope with this. D. The lower grounds of the village are very well known to become flooded during spells of bad weather. This has been well publicised this month alone. Removing much needed green belt land will no doubt push the problem elsewhere. We need the open fields to soak up excess rainfall and act as a natural flood defence system. Tarmaced housing estates in its place will lead to catastrophic consequences in this situation. E. The area has current derelict brown field sites. Why cannot these be considered as potential sites which will improve the area and in turn save our green belt land.

Suggested Modifications:

We are currently about half way through gas repair works at one of the key crossroads in west vale and at all times of the day traffic heavily builds up. This is an indication of how congested the area will become on a daily basis. At the other West Vale crossroads turning from the Elland direction towards Halifax is already difficult sometimes with just one car moving through the lights in time and this goes on to strain the rest of the road network. I believe it was considered a few years ago that it wouldn't be possible for a second filter lane to be created to ease congestion so this will be something which will only become an even greater problem. B. The newly generated traffic from the proposed site could lead to Sunnybank road becoming a

rat run as commuters use it to avoid one set of traffic lights on the way to Halifax. C. Our current Schools are already at full capacity, how will it they handle the increased population? Our current schools cannot surely handle this increase. Greetland on its own is only a small village and cannot be expected to cope with this. D. The lower grounds of the village are very well known to become flooded during spells of bad weather. This has been well publicised this month alone. Removing much needed green belt land will no doubt push the problem elsewhere. We need the open fields to soak up excess rainfall and act as a natural flood defence system. Tarmaced housing estates in its place will lead to catastrophic consequences in this situation. E. The area has current derelict brown field sites. Why cannot these be considered as potential sites which will improve the area and in turn save our green belt land.

Comments:

Additional Evidence Link:

Comment ID **HRU1430**

Site ref (if applicable): **LP0952**

Person ID: **1243973**

Name: **Mrs Amy Hannah**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

All points below should be considered to apply to sites LP0026, LP0177, LP0952 and LP1625 and therefore these sites should equally be rejected from the Local plan. I would like to point out that plans LP0026 (The Gate Farm), LP0177 (Land adjacent Ellistones Place), LP0952 (Land at New Gate Farm) and LP1625 (Land to the west of Silverdale Terrace) should be considered as one and these are not separate proposals as they are so interrelated (sited within a small 1 km area along Saddleworth Road) that they can only be assessed fairly if considered as a whole. By splitting them out as separate plans the full picture is being concealed. The Local Plan does not address the implications of the National Planning Policy Framework, especially, NPPF Para 177 and the associated PPG in the Sustainability of Greenbelt Sites. According to the NPPF Para 143 under 'Proposals affecting the Green Belt' it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' The very special circumstances do not apply. Other reasons not legally compliant. Poorly advertised and believe that residents of Greetland have not been made aware of the proposal and given opportunity to comment.

Do you consider the plan to be Sound?: **No**

Sound Reason:

My main points of objection are as follows: Flooding issue This affects the whole area and is relevant to all sites in question. The land put forward is unsustainable. Further development will result in additional surface run off. This in turn will contribute to further flooding. The fields considered for development currently act as a natural flood defence and even without the further development they are unable to cope with absorbing heavy rainfall. We have seen the effect of this in recent weeks and it has resulted in severe flooding in the area, flooding of Black Brook at the bottom of these fields and into West Vale. In 2015, the Boxing day Floods demonstrated this at its worst. Clearly, building more houses on these fields will cause major issue contributing to further more serious flooding. Calderdale council therefore have a duty of care to comply with current policy and legislation on flooding and they should remove these fields from the

Local Plan. Para 155 of the NPPF states that ' Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas of highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere ' Effect on Greenbelt Land The NPPF at a para 133 states that -“ The Government attaches great importance to Green Belts ”and at para 136 that -“Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified”At para 144 it further states -“ local planning authorities should ensure that substantial weight is given to any harm to the green belt”and at para 145 -“ a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt ”Building on these sites is contradictory to all of these statements. If considering all of the sites as one as we should be doing, the development would mean a large and disproportionate amount of land and open space would be lost from this small community. This also includes the loss of public amenity, wildlife habitats (foxes, badgers, bats, rabbits, deer, birds of prey), loss of green space, loss of wildlife corridor, loss of public footpaths and the creation of urban sprawl. I believe such loss associated with Greenbelt will contribute to affecting our community's wellbeing and mental health in a negative way. The Greenbelt is free for the community to use and greatly benefits the vast majority of residents who utilise this on a daily basis. The land is a quiet, safe and therapeutic environment and is the centre of our community. To lose all this would be devastating. Increased air pollution The proposed plans would obviously create more air pollution due to more houses, more people and more cars. The single biggest air polluter is traffic, or road vehicles. More people die of air pollution than Malaria and HIV, this should be a consideration when looking at these proposed plans to develop on such disproportionate scales. The Clean Air Strategy 2018 states that - While we need to ensure economic growth, we also need to realise the 'cost of air pollution on health'. Infrastructure The increase in houses at this capacity will add a huge pressure to already full schools in the area. The schools are not big enough to cope with this amount of new housing. The doctor's surgery is also full and already struggles to cope with the number of patients and appointment requests. The NHS dentists have long waiting lists without further increase to residents. There is one main road which runs through the proposed area which would not be sustainable for such an increase in traffic as a result of the development. The existing sewage system and drainage cannot cope with the current volume and with the rain water seen in recent times and in past years has caused the raw sewage to overflow into the footpaths and fields in the area. This problem would only increase with further development. Traffic congestion and noise pollution Greetland and West Vale already suffer chronic traffic congestion, The village is already at breaking point at peak times and the roads cannot cope with the existing volume of traffic, let alone adding to that with these proposed developments. At school drop off times Saddleworth Road becomes a single lane road due to the parked cars on both sides. It becomes an obstacle course to get through and the large lorries that frequent the area make it dangerous for road users and pedestrians. I fear for the lives of the children trying to get to school daily..

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Do not build any of the proposed housing in the Local Plan on our Greenbelt land.

Comments:

Additional Evidence Link:

Comment ID **HRU1434**

Site ref (if applicable): **LP0952**

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?:

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 **HRU1439**

Site ref (if applicable): **lp0952**

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?: **No**

Sound Reason:

points of objection; 1. air pollution 2. flooding 3. infrastructure 4. wildlife 5. traffic congestion

1. Air pollution As a mother of 2 young children, the quality of the air is already a concern. 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. This is not even considering the school and nursery school along the route, I have been unable to identify any assessment of air quality at the moment.

2. flooding The area in question has already been greatly affected by flooding, the latest only 2 weeks ago with moving water. This is considering the existing land is soil, a natural drainage system, imagine this being concrete and this running into Black Brook which already overflows during heavy rain. I am concerned that this would put surrounding areas, residents and business owners at risk in West Vale.

3. Infrastructure 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. The GP surgery is also extremely busy and under pressure.

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.

5. traffic congestions closely related to comments regarding air pollution, the traffic in West Vale and surrounding areas is out of control as it is. I often struggle to leave my cul de sac to get to work due to queuing traffic at peak times, traffic is at a standstill often and for long periods. I often fear for the safety of the local school children as they 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.

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 **HRU1446**

Site ref (if applicable):

Person ID: **1243996**

Name: **Mr Gethin Jones**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Green Belt: As stated in NPPF: -“The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.” (NPPF, Para 133, 2019) -“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other

reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy" | ..makes as much use as possible of suitable brownfield sites and underutilised land." (NPPF, Para 136-137, 2019) The Local Plan has failed to examine fully all other reasonable options and has failed to provide a compelling argument for exceptional circumstances.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Planned developments have to be proportionate to the size of our existing settlements. Infrastructure planning specifically in relation to healthcare needs to be prospective rather than retrospective. I have significant concerns with the lack of specific plans in relation to healthcare provision in the area given the extent of the proposed developments. Sites LP26, LP177, LP953 and LP1625 are in very close proximity and as such my comments are to be considered for all these sites given their cumulative impact on the local area. Rather conveniently, in their evidence submissions, Calderdale council have chosen to disguise the disproportionate development in the Greetland area by combining it with areas where there is less significant development planned. (Elland, Stainland and Holywell Green). The quoted figure of 8.21% growth in the number of dwellings cannot be used as a reference when considering the effect on the local infrastructure. The Calderdale Review of Polling Districts in 2019 states that there are 1726 dwellings in the Greetland and Sunnybank wards. The above named development propose 543 new dwellings in these wards giving a staggering percentage increase of 31.4%. This clearly represents a disproportionate increase in the area. Report CC37 details a previously proposed development site which was considered and rejected in neighbouring Barkisland due to a "disproportionate increase to Barkisland village". This represented a 16.6% growth in dwellings. Questions must be asked about the boundaries used by Calderdale Council when calculating their growth percentage in Greetland. As a healthcare professional working in primary care in Calderdale I have significant concerns with the clear lack of infrastructure planning in the local plan generally, especially in relation to healthcare provision. The -"Health and Wellbeing Infrastructure Supporting Paper" submitted as evidence is somewhat inadequate as reassurance that there is any meaningful plan to address the concerns of the local community in relation to healthcare access given the disproportionate increase in population planned. This is summarised well in its conclusion: -"The Local Plan has been prepared at a time of significant change to the delivery of health and social care. These changes are yet to embed themselves and as such it is not possible at the present time to provide a finalised position on the physical health and wellbeing infrastructure that will need to be delivered..." This is not an adequate plan. This conclusion does not satisfy national policy nor NHS Policy statements: The National Planning Policy Framework specifically requires councils to -"take into account and support the delivery of local strategies to improve health, social and cultural well-being 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 Well-being Infrastructure Supporting Paper" about any plans regarding frontline NHS services not under the control of the CCG, specifically dentistry. The local NHS dental service is already oversubscribed and inadequate for the needs of the existing population. An NHS Choices search conducted in January 2020 showed no dental surgeries accepting new patients in a 10 mile radius of the proposed developments. There is no evidence of any consultation with local providers or NHS England in this regard. This is a missed opportunity to identify a strategy to address inequalities in access to healthcare in our area. A 31.4% increase in dwellings in an area serviced by 1 dental practice would cause an access crisis with resulting impacts on the local GP surgery and A&E department. In conclusion. The percentage increase in dwellings has been misrepresented in the figures submitted. The potential impact of the true 31.4% increase in the area or Greetland would be catastrophic.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Remove site from local plan as unjustified development on Greenbelt land with no exceptional circumstances. Properly assess the impact of a 31.4% increase in dwellings in Greetland. Provide meaningful plans on healthcare provision for such a population increase.

Comments:

Additional Evidence Link:

Comment ID **HRU145**

Site ref (if applicable): **LP0952**

Person ID: **1239027**

Name: **Mr Nigel Duckworth**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

1) The current policy and legislation on flooding states -“due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in high flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere” - In the Calderdale Boxing Day Floods 2015 the field LP0177EllistonesPlaceSaddleworthRoad,Greetlandsuffered severe flooding. Any building on this land would cause flooding and therefore does not comply withcurrentflooding policy and legislation as outlined above. Calderdale Council Planning Department has a legal responsibility to comply with current policy and legislation on flooding. These fields are a natural and essential soak off and any building on this land would further increase the flooding in this high risk flood area. 2) I draw your attention to Esther McVey, Housing Minister's written policy onGreenBelt land.; -“Of course one of the most important environmental safeguards we have is the Green Belt. And I want to be clear that our commitment to this is as strong as ever, with any changes only happening in exceptional circumstances ; protecting the Green Belt goes beyond protection against development” - Esther McVey has provided Â£2 million pounds for Councils to employ Enforcement Officers to prevent Green Belt land being built illegally and Calderdale Council is listed as one of the Councils who is a recipient. The Enforcement Officer's role is to ensure "unscrupulous developers" do not apply pressure on Councils to build on the Green Belt and not the available brown field sites because "developers don't want to build on brown fields sites". - Horsfall Mill is an ideal brown field site and meets the demographics of the area perfectly and complies with the NPPF government policy of - “building the right houses in the right places” -Exceptional circumstances in The Government White Paper -“Fixing our Broken Housing Market” -Parag 1.39 states that: The Government wants to retain the high bar to ensure the Green Belt remains protected, but we also wish to be transparent about what this means in practice so that local communities can hold their councils to account therefore we propose to amend and add to the National Policy to make it clear that: authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including :- making effective use of suitable brownfield sites (Calderdale Council has not adhered to this with regard to Horsfall Mill, West Vale) and the opportunities offered by state regeneration :- I refer to the Judicial Review - Calverton Parish Council v

Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council (2015) EWHC 1078 (Admin), Jay J - where Richard Turney appeared for the claimant "Mr Turney ... submitted that the fact that a particular site happens to be suitable for housing development cannot, without more, constitute an exceptional circumstance justifying an alteration of the Green Belt. I agree with Mr Turney insofar as this goes..Suitability simpliciter cannot logically be envisaged as an exceptional circumstances". -This land is classified as "highly sensitive green belt" on the Local Plan and there is no legal justification for building on this land. It is not legal to classify Green Belt as greenfield on the Local Plan ; they are totally different and your own tests states all the Green Belt land identified on Saddleworth Road in the Local Plan for building meets the five test and therefore you have no legal right to change this classification. I question the legality of Greetland being placed in with Elland on the Local Plan; Greetland is a small village in the Greetland/Stainland Ward HX4 whereas Elland is a town HX5 ward. This is false representation and when you look at the building volume within this area of approximately ½ a mile in this small village taking out the whole of the Green Belt land on the south side of Saddleworth Road this will totally change the nature / look and the openness of the village and is a prime case of urban sprawl. Mr Justice Jay in the Calverton Parish Council v Greater Nottingham Councils [2015] EWHC 1078 stated that:- "it would be illogical, and circular, to conclude that the existence of an objectively assessed [housing] need could, without more, be sufficient to amount to - "exceptional circumstances" within the meaning of paragraph 83 of the NPPF" R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCACiv404, Treacy, Underhill, Lindblom LJ - "The concept of - "openness" here means the state of being free from built development, the absence of buildings ; as distinct from the absence of visual impact" [7] Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council [2015] EWHC 1078 (Admin), Jay J

Do you consider the plan to be Sound?: **No**

Sound Reason:

Horsfall Mill, West Vale is ideally located for affordable, good quality housing; it would not change the nature or look of the village and is perfectly located for young first time buyers to access the many amenities / leisure facilities without the need for a car. The Calderdale Plan targets for housing as we have now come out of the European Union the housing volume should be less resulting in a much lower housing target and reduce the need to release the Green Belt sites in Greetland. The NPPF sets out the aim of Green Belt policy which is - "to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence." (NPPF 179). Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: (i) to check the unrestricted sprawl of large built-up areas (ii) to prevent neighbouring towns merging into one another (iii) to assist in safeguarding the countryside from encroachment (iv) to preserve the setting and special character of historic towns (v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The Council, in its own evidence, concludes that the overall parcel within which the site is located performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt but, most decisively, would see the coalescence of Greetland and West Vale and the deterioration of the identity of both places undermining the Council's Settlement Hierarchy. Notwithstanding this, the quantum of housing proposed in and around the site is undeliverable during a single plan period in plan-making terms and unsustainable in infrastructure terms in relation to the capacity of existing highways, schools and local services. Accordingly, these sites on Saddleworth Road in the existing Green Belt should be removed from the Plan as the exceptional circumstances for their release does not exist. Furthermore the proposed sites do not meet national policy with regards to flooding. Clean Air Policy ; even higher numbers of traffic would cause further pollution in what is already a bottleneck area of high congestion. And be detrimental to the health of the toddlers / young children at Sunny Bank Nursery / Pre-School whose playground is situated approximately 3 feet from this very busy main road (picture attached

of congestion down this road). Saddleworth Road services many areas i.e. Barkisland, Ripponden, Norland and other outline districts and heavy goods vehicles regularly use this road e.g. Sonoco; these are high pollutant diesel vehicles and evidence shows particles of pollution fall lower to the ground making small children more vulnerable.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

To built on the Green Belt sites proposed in the Local Plan would totally change the nature / look and openness of the village in a very detrimental way to both residents and wildlife in this wildlife corridor whilst also being illegal due to the flooding and protected Green Belt policy in the NPPF.

Suggested Modifications:

N/A

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5595371>

Comment ID **HRU1452**

Site ref (if applicable): **LP0952**

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:

Do you consider the plan to be Sound?: **No**

Sound Reason:

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 unmanageable, 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 travelling 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. The release of this Green Belt land does not qualify as exceptional circumstances. The Objectively Assessed Need for housing that the council relies on to make population predictions is based on out of date information, and therefore must be questioned. In addition to this, the council's estimations for annual job growth assumes that Calderdale will experience rapid and constant growth. This is not realistic and has the effect of raising the housing requirement in such a way that it becomes harmful and unsustainable. In 2016 the WYCA (West Yorkshire Combined Authority) published its Strategic Economic Plan to cover employment growth for the Leeds City region to cover the period up to 2036. They estimated 35,700 net additional jobs in that time. In part, it is these figures that Calderdale have based their projected employment growth on, however, the Leeds City region has produced below average employment over the past 30 years but in their Strategic Economic Plan they envisage well above average growth in the next 15 years. This is extremely optimistic given that the current unemployment rate in Yorkshire is 4.3% which is the second highest of any region in the UK and is currently increasing. In their economic projections, Calderdale are hoping that the 'Northern Powerhouse' (which doesn't actually exist except on paper) and HS2 (although how?) will generate historically unprecedented rates of employment growth. This forecast means that Calderdale will miraculously go from below average employment growth to significantly above average growth. Calderdale need to revisit their economic forecast which is based on the assumption that our economy will grow because of the effect of the Northern Powerhouse which is not evidenced in any way. And because they have over-egged the economic growth, Calderdale need to find more land to build on. If their economic growth was more realistic, there would be no need to build the extra houses.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

The process is required to be simple and accessible, but it is not.

Suggested Modifications:

Remove this land from the Local Plan.

Comments:

Additional Evidence Link:

Comment ID **HRU1460**

Site ref (if applicable): **LP0952**

Person ID: **1243998**

Name: **Mrs A Hemsworth**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Sustainable Development I believe that the council has not fully considered brown-field sites, and that the council should not be put under pressure from house builders who prefer the 'easier' option of greenfield sites. The plans for this site are not sustainable. Your data shows that Greetland has been combined with Elland, and therefore the figures show a distorted image. In reality, houses on this site (as part of over 600 new homes) is disproportionate to the size of the village of Greetland and would significantly alter the semi rural nature of our existing community. Green Belt This land is designated as Green Belt land and as such prevents urban sprawl. What are the exceptional circumstances for building on this land? You do not provide any evidence! Flooding This site does NOT meet the National Policy with regard to flooding. The land to the south of Saddleworth road, provides an area for excess rainfall to settle, soak and drain away into Black Brook, which then flows in to the River Calder at West Vale. There are layers of clay in the Greetland hillside, and there are many springs as a result. Water drains through the millstone grit and off the hillside and moors above, following a complex drainage system of springs, streams, old mill dams and wells, which slow the flow of the water. This land is not suitable for housing due to the high water table and the fact that the lower part of the field is a flood plain and regularly floods from surface run off. We must let the water soak away naturally and NOT add to the already devastating floods experienced in Elland and further down the valley. Our weather systems are changing and what was once considered to be a 'once in a 100 year flooding event' is now happening every few years. Traffic; With over 600 houses proposed in total, there would be a potential 1200 extra cars on Saddleworth Road. There is already chronic congestion at the two (unavoidable) junctions in West Vale which causes traffic to back-up through the local villages of Greetland and Holywell Green and any extra traffic would cause massive tail backs; WSP Parsons Brinckerhoff Report on Transport Network states that: traffic congestion at the juncture of Stainland Road-Saddleworth Road would increase by approximately 105%, and that traffic congestion at the juncture of Stainland Road-Rochdale Road would increase by over 100%. Air Pollution - Unfortunately, cars are often queueing for the west vale traffic lights right outside the junior school on Saddleworth Road. This proposed development will cause considerably more pollution, allowing toxic air to compromise the health of vulnerable developing children, stunting lung growth and causing life-long health problems. The pollution caused will affect all the residents of our village, and surely this goes against the Calderdale Council's own Air Quality Action Plan and the West Yorkshire Low Emissions Strategy. Infrastructure; The infrastructure of the area cannot support the extra households for this site, never mind the 600 households if the whole of the proposed developments are approved. We have no extra capacity in the school; Calderdale council's own figures show that a further 206 school places would be required. The GP surgery could not cope with an extra 600 families, and the NHS dentist already has a waiting list. Ecology; This area serves as a green corridor between the villages of Greetland and Stainland, and has a well used public footpath which spans the whole length of the proposed sites. This green wildlife corridor hosts an abundance of flora and fauna such as bats, deer, foxes, squirrels, owls, kingfishers and much more. Black Brook is a clean natural brook with a population of wild brown trout. The proposed building works will affect the ecology of the valley by:- increasing air pollution, noise pollution, and artificial light pollution; and by creating overbearing buildings and oppressive human presence. Open Space; This amenity has many benefits; it is good for our mental and physical well-being, and the footpaths in this area are well used by families, dog-walkers, bird watchers etc. The Local Neighbourhood Plan Committee recently commissioned a report as part of their programme to preserve and retain Green Spaces for the Health and Wellbeing of all local people.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1465**

Site ref (if applicable): **LP0952**

Person ID: **1243898**

Name: **Mrs Janet Baker**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Government policy is to protect green belt land from unnecessary development, unless in special circumstances. There are no special circumstances in relation to this site. The greenbelt land in question is serving its purpose as a valuable green ribbon to safeguard against encroaching development and merging urban sprawl. It is actively being used as farmland for sheep, horses and cattle. It is valuable space for public use, for exercise and leisure, and provides access to countryside for health and wellbeing for local residents, and people visiting. It provides "green lungs" to mitigate against air pollution and carbon from nearby M62.

Do you consider the plan to be Sound?: **No**

Sound Reason:

There is a risk of flooding, obviously, when building on land listed on local plan as "a flood risk area". There would be significant habitat loss, which would impact on wildlife. There would be a huge increase in car use, which would affect air pollution. The roads are small and already congested. Significant road building and widening would be needed to accommodate the increased traffic. The size of the proposed development is too big and out of character with the semi-rural area. It is like creating a new town, without any supporting infrastructure.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Information about this change to the local plan, has not been publicised enough, especially when it is going to have such a radical impact on the rural environment. It has been difficult and confusing to access information. The website is not as accessible and user-friendly as it could be.

Suggested Modifications:

Using brownfield sites instead of greenbelt land. Greenbelt protection should mean just that. The development is too big and would destroy the character of the area. More consideration should be taken of how this development would impact on climate change, by destroying the natural ecology of the area. There is a significant flood risk.

Comments:

Additional Evidence Link:

Comment ID **HRU1475**

Site ref (if applicable): **LP0952**

Person ID: **1243991**

Name: **Mrs Diane Kershaw**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Objection by Diane Kershaw ; 23 February 2020 I am writing to register my objection to part of Site LP0177, which I believe, lies within flood zone 3A ; the highest classification of flood risk. Preventative Measures Has an Environmental Agency Scientist been employed to measure river flow, how fast Black Brook floods and whether its banks are eroding in order to protect the surrounding area and ultimately West Vale further downstream? Have Hydrologists studied the flood plain in its original state compared to when there are heavy floods? If the development goes ahead, the area will have less capacity to absorb the rainfall. It is normal in very wet weather for the fields to absorb the water like a giant sponge subsequently releasing it more slowly without overwhelming the water courses. If the green belt is covered in concrete and tarmac, the land has no capacity for retention, water will simply rush straight down with inevitable consequences. Could existing and future residents be reassured by the Inspector at Calderdale Council that every effort has been made to study the Environmental Agency's detailed reports? What plans have been put in place for the excess water go if development takes place? Another scenario which has hit the headlines many times and the area was visited recently by the Environmental Minister, is Mytholmroyd/Hebden Bridge. There is photographic evidence of flooding for well over 100 years and is still causing destruction. What has been learnt from this to prevent the same situation happening in Greetland/West Vale in the future? I have never heard of West Vale flooding and pray this does not happen in the future. Who is ultimately accountable for the flooding in Mytholmroyd and Hebden Bridge for over a century? We cannot sustain these 'rare' incidents which are now occurring many times in a decade! Who will be accountable when it's too late should the development in Greetland go ahead? Infrastructure What are Calderdale Council's plans for upgrading the infrastructure ie pre-schools, primary schools, doctor's surgeries, dentists and road network improvements to alleviate traffic congestion if the large housing development takes place? The air pollution is at a considerably high level at the moment and you can smell the exhaust fumes (see British Heart Foundation's report on our area). Toxic air potentially affects the normal electrical function of the heart and stays in the blood stream for at least 3 months! What impact does this have on children and parents walking to school now and in the future? The particularly congested roads in West Vale and Stainland Road leading to and from Greetland Academy and preschool, particularly at peak times, already causes a problem with parking and pedestrians are walking through pollution caused by the already excessive number of vehicles. Has anyone from Calderdale's Environment Department measured the pollution levels and can the Council's results be viewed anywhere online now or in the future please? Flooding Calderdale have declared a climate emergency and having records of the flood plain in its natural state over many years, I was shocked and surprised to learn of the proposed development in Greetland and in particular at the back of Woodfield Drive. 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/5609803>

Comment ID **HRU1478**

Site ref (if applicable): **LP0952**

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 LP0952. 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/5609806>

Comment ID **HRU1481**

Site ref (if applicable): **LP0952**

Person ID: **1243981**

Name: **Mr Michael Ashton**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Flooding Paragraph 155 of the NPPF clearly states that, -“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk” In putting these sites forward the Council is ignoring the policy requirements of the Framework. The reports compiled by the Council for this site when putting together the Publication Draft version of the Local Plan in 2018 concluded that the site should be filtered (i.e. not taken forward as housing allocations) because of ; amongst other things ; flooding and drainage issues. Sequential and exceptions tests would have been necessary to demonstrate that the sites were suitable for and safe to develop. Although the Planning Inspector identified an insufficient supply of housing land following the Stage 1 examination process, it should not simply follow that additional sites are now allocated without a thorough assessment being made as to their suitability to counter the reasons why they were initially filtered. The three sites seem to have been put forward as a simple response to the Inspector's comments with no consideration of the flooding and drainage issues associated with the land. Green Belt The Green Belt Review was carried out in 2017, the reference numbers are 065 and 339. The conclusion of this review was that this site performed strongly in terms of their Green Belt function. The Green Belt Land is classed as Most Sensitive. Development of this site would result in the unrestricted sprawl of the large built up urban area of Greetland. The site assessment reports carried out ahead of the consultation on the Local Plan Publication Draft in 2018 concluded that the land represented the -“most sensitive Green Belt” Given this there is no planning policy justification to ignore that impact ; importantly carried out as part of a thorough Green Belt Review of the borough just over 2 years ago ; and now consider the sites suitable for allocation for housing. Such allocation would conflict with key purposes of including land in the Green Belt and would have a fundamental adverse impact on the openness of the Green Belt. We do not see that the council is able to substantiate their claim that the aspiration growth for Calderdale is achievable, as this would set an economically low achieving council as able to surpass the trends for economic growth seen nationally. There is no explanation for this. Calderdale will end up with a surplus of houses and a shortage of Green Belt land. Other Issues The site assessment reports carried out in advance of the 2018 Publication Draft identified other areas of policy conflict ; in particular heritage, open space and sustainability. It was at that time recommended that none of the sites should be allocated until an assessment had been made of the heritage impact. To our knowledge that has not occurred, as we see no evidence of this in the site reports. The sites were identified as providing valuable natural and semi-natural open space. This would be lost if the sites were allocated for housing. The land is particularly important to the residents of Greetland, which can be seen in the photos attached of the pressure group protest walk. The public right of way is used by the vast majority of the local residents, and even Calderdale residents from further away. This public amenity is highly important for the purposes it serves within the community, and should not be taken away or made unsafe to use, just to fulfil an unsubstantiated housing requirement. In terms of sustainability, a negative factor in not bringing the sites forward in the 2018 consultation was the distance to a railway station (in excess of 2kms). By definition that negative factor remains and forms part of the reason why other potential sites in the area have not been brought forward (such as site LP1089 on Rochdale Road).

There are other sites within Calderdale as a whole that better fit the criteria of sustainability. Not all of the possibilities have been sufficiently explored. Conclusion All of the reasons why these sites were not brought forward at the Publication Draft stage remain just as relevant now. There has been no further assessment of any of the significant constraints which resulted in the sites being filtered at that stage. The only reason for bringing them forward for allocation now is based on a simple exercise of responding to a requirement to increase the housing supply. There is no justification for allocating these sites given the evidence of flooding, and given the fundamental conflict with the Green Belt Review in 2017. No consideration has been given to the potential to bring forward other sites in the area that do not carry these fundamental problems. No consideration has been given either to the lack of infrastructure available in Greetland to accommodate such a significant level of new housing. We hold great hope that upon being presented with a more rounded view of the facts surrounding the development in Greetland, the inspector will be able to make a fair decision regarding this matter.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

The process has not been simple or straight forward, as it is supposed to be. Finding information has been difficult, and I do not believe that all members of our community will have been able to partake in the consultation, which is not fair.

Suggested Modifications:

Remove this land from the Local Plan, and reassess the housing requirement. Alternatively, consider less sensitive, lower risklandelsewhere in Calderdale. It appears that Calderdale is allowing developers to dictate where they would most like to build houses based on house prices, or profit, rather than the sustainability of the land. We have been advised that the density of development could be increased in the more sustainable proposed development in the Brighouse area, as this would result in a decrease in the release of Most Sensitive Green Belt land, especially like the type of unsustainable land proposed for development in Greetland. In short, there are a number of different options to follow before this land should be even considered.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5609808>

Comment ID **HRU1483**

Site ref (if applicable): **LP0952**

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 backed up 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 site LP0952 from the proposal, find brownfield sites to build on.

Comments:

Additional Evidence Link:

Comment ID **HRU1492**

Site ref (if applicable):

Person ID: **1244004**

Name: **Ms Victoria Myers**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

It is not protecting green belt land and ensuring brown field sites are developed first. Out of date information, figures need revisiting post brexit and economic growth forecasts, and specific for the local are not based on Leeds. I do not believe this plan complies with the National Planning Policy Framework, in particular section 13. Protecting Green Belt Land A strategic attempt has been made to divide opposition of sites within Greetland, therefore my comments and objections are the SAME for all 4 sites proposed for development, as essentially they are all facing the SAME constraints and will have the SAME detrimental impact on the locality, for reasons I shall state below

Do you consider the plan to be Sound?: **No**

Sound Reason:

The infrastructure, in respect transport, highways, education, and medical needs are totally inadequate for any development proposed of this scale. Because there are many other areas including Brownfield sites within Calderdale which have not been considered for inclusion in the in the Local Plan, it smacks of discrimination. Complete disproportionate amount of building proposed for in this area. The revisions to the local plan (when the 4 sites off saddleworth road were added, AFTER the plan was agreed and supported by local councillors) proves further unsustainable development with a disproportionate amount of new homes proposed across four sites in Greetland with over 60% proposed in the Elland area. I might also add that it is evident and has not gone unnoticed of the massive proposal to build in non Labour majority wards. The biggest area for concern is the flooding - not a flood risk as we have seen in 2015 and most recently only in February 2020 the areas are flood plains. Natural springs, even streets and lanes are named after them for a reason! It is not rocket science to get the link between the steep sided hills all around Greetland, surface water will and does pour down the roads and these green field sites do their job to help limit the flood effects, protecting the nearby houses and when the Black Brook can cope, off it goes into the river and on to West Vale, Elland, Brighouse..... If this water has nowhere to go it will have serious detrimental effects not only to the people living in existing and new houses but the wider areas mentioned above as they will flood even worse and more frequently, as a risk to life and certainly detrimental impact to highways and bridges and people being able to get about to do their jobs. The further addition of possibly 1200 cars (2 per household) will increase air pollution and the proximity to the local infant school will have health effects on the children, when we're already facing an unprecedented increase in childhood asthma. The plan was based on housing Requirement to support the economic growth plan. This country has just seen its biggest change in 47 years, Brexit! The plans are not current and not compliant. Economic growth should be called for review! The housing need was calculated in 2016 which will be significantly reduced in Brexit Britain! Wildlife corridor - Currently the valley enjoys the presence of; deer, herons, squirrels, foxes, and other wildlife to the benefit of residents. Final point, The Council should consider increasing the density in the Brighouse building sites, and the CPRE has made this suggestion.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

I have found that Calderdale's publicity surrounding these proposals to have been somewhat limited, and lacking in ensuring complete openness, and robust attempts at consultation with the community. I found it underhand that the local plan was set and agreed and voted on in council in 2018 and then somehow these 4 sites, a not insignificant 600 houses were added in - on a technicality that Councillors agreed to allow small changes without a revote (simplified wording). Is there been any evidence of cross boundary cooperation in meeting the housing needs??

Suggested Modifications:

Brown field sites MUST be exhausted before any more greenfield sites are developed

Comments:

Additional Evidence Link:

Comment ID **HRU1498**

Site ref (if applicable): **LP0952**

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 currently tests 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 Greetland Corridor sites 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 would now be selected and be more deliverable with a footprint that is dispersed across the CLP with a lower impact to Green Belt with less uncertainty relative to site appraisal assessments. 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 larger non-local companies). 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. Green Belt As commentary demonstrates this site performs very well against objectives.

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 that Leeds City Region Statement of Common Ground August 2018 has 6 signatures missing.

Suggested Modifications:

Removal of Site LP0952

Comments:

Additional Evidence Link:

Comment ID **HRU1500**

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 a being at risk of surface water flooding. It is already devastating to see the fields directly below this plot regularly flooded after short periods of heavy rainfall, which threatens adjacent homes and undoubtedly impacts further downstream in West Vale and Elland Bridge, a bridge which partially collapsed in the floods of 2015, costing 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 this point 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 using this road daily and congestion is a daily occurrence around the Greetland Academy School. The noise pollution from the current levels of traffic along Saddleworth Road is considerable and this, plus air pollution, would increase dramatically if these plans go ahead. The young children attending the primary school alongside this road would bear the brunt of this air pollution . This land is an integral part of the community at Greetland . The walks alongside the small river are very popular with families and walkers. 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 **HRU1503**

Site ref (if applicable): **LP0952**

Person ID: **1243885**

Name: **mrs victoria travis**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

I do not consider the plan to be sound for the following reasons; Greenbelt NPPR states greenbelt development should demonstrate exceptional circumstances. The site assessment report and sustainability appraisal report does not demonstrate any exceptional circumstances. Brown field site should be exhausted. A site on Saddleworth road in Greetland has just come up for sale. An allowance for brown field windfall sites should be included in the Local plan due to Calderdale manufacturing heritage, Optimising the density of development in other areas. Can other sites have that have already been allocated for development have their density increased? The Turley 2019 report makes no mention of discussion with neighbouring authorities to see if they could accommodate some of the housing needs. This could be part of the Leeds City region approach. This site is classed as highly sensitive greenbelt and grade 3 agricultural land. Development of this site would result in loss of openness and urban sprawl as this is currently the boundary of the greenbelt. Development of this site would result in the damage to the environment as new resident would be heavily 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 Greenbelt land on sites with no proposed infrastructure, where car travel is inevitable, will greatly reduce air quality. Flooding The fields have valuable use as a water storage area reducing surface run off and increasing lag time. Development would result in flooding issues further down the water course. Infrastructure Policy on plus transport. There is no infrastructure planned for Greetland. There is a train station planned for Elland I first heard of this 20 years ago! If the elusive station is supplied there is the obstacle of West Vale which all residence must travel through. WSP Parsons Brinckerhoff Report on Transport Network states that, "ç This report identifies that traffic congestion at the junction of Stainland Road-Saddleworth Road would increase by approximately 105% "ç This report also identifies that traffic congestion at the juncture of Stainland Road-Rochdale Road would increase by over 100% It is simply not fair to increase a village by 600 houses and offer no infrastructure. PLEASE NOTE GREETLAND IS NOT IN ELLAND. Potential for roundabout at Gate Head Lane/

Scar Bottom Lane/ Saddleworth Road junction in conjunction with site LP0026. There is no space for a roundabout in this area, with 600 cars regularly using this roundabout it would be a major junction. The area is surrounded by trees with TPO on. No regard for extra school places as the NPPF suggests there should be, Wildlife This is a wildlife corridor to develop in this area would seriously hard the wildlife corridor. There will be a loss of habitat if the site is developed for bats, woodpeckers, deer kestrel, herons and many more birds. Sustainability appraisal report Firstly it should only be a positive or a negative outcome. There are 11 outcomes that are uncertain out of 17, therefore this document can not be used to judge soundness as the majority of objectives are unanswered.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Remove site from the plan.

Comments:

Additional Evidence Link:

Comment ID **HRU1510** Site ref (if applicable): **LP0952**

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:

Disregards local and government policies on building on Flood Plains Disregards government policies on building on and protecting Green Belt

Do you consider the plan to be Sound?: **No**

Sound Reason:

The local plan does not consider other unused brownfield sites locally Diregards local issues inrespect of flooding ,lack of infrastructure ,risk to health and local wildlife

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

This proposed developement doesn't comply with national and local policies in respect of environmental air quality ,green spaces ,flooding and Brownfield sites

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU152**

Site ref (if applicable): **LP0952**

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 deconstruction 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 **HRU1523**

Site ref (if applicable): **Lpo952**

Person ID: **1244072** Name: **Mr Tim Stirrup** Organisation:

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 oppose this planning proposal based on the fact this is greenbelt land and should be preserved as such for present and future generations health and wellbeing. We are facing imminent climate change on an unprecedented scale. We have species loss on an unprecedented scale and are facing mass extinction unless we immediately protect and preserve our natural environment. The council cannot ignore these facts and has a responsibility to the residents of Greenland and the planet to oppose this planning application. New housing should be built on brown field sites not greenbelt land rich in biodiversity. I also oppose it on loss of crucial habitat for wildlife and I oppose it on the basis that the road infrastructure cannot cope with the current traffic use let alone further developments that will increase 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:

Comment ID **HRU1547**

Site ref (if applicable): **LP0952**

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 **HRU1558**

Site ref (if applicable): **LP0952**

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/5610128>

Comment ID **HRU1576**

Site ref (if applicable): **LP0952**

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/5610149>

Comment ID **HRU1582**

Site ref (if applicable): **LP0952**

Person ID: **1244088**

Name: **Mr john stowe**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

I am not convinced from the publicly available documentation I have been able to access that the constraints have been examined in a thorough manner. Environmental impacts, flooding risks etc. have indications that issues can be "mitigated", but without detailed information of what the proposed mitigation's would be.

Do you consider the plan to be Sound?: **No**

Sound Reason:

I would consider the plan to be unsound in relation to the factors below Green Belt development Duty to protect land designated as 'Green Belt'. Particularly relating to these extracts from the 'National Planning Policy Framework' Paragraph 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. 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. Paragraph 137. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. I cannot readily identify what would give rise to a conclusion that there were "exceptional circumstances" involved which would provide good reason to override established principles of Green Belt protection. Flooding This area is identified as being at risk of flooding and the site has a network of water courses and springs Given the current situation in the Calderdale area regarding serious flooding and the frequency of such flood events in recent years, the risks involved would argue against considering that there are 'exceptional circumstances' justifying green belt development on this site. I understand that Calderdale Council identified a 'climate emergency' situation (<https://www.calderdale.gov.uk/v2/council/our-vision/climate-emergency>)early last year and cannot see how this is consistent with promoting Green Belt development on sites subject to flood risk. Traffic I would represent that additional traffic flow along Saddleworth Road from this 600 home project would in reality be significant. The West Vale junction is already subject to congestion and there are also two schools on this road with the typical related congestion at peak times. Traffic Additional traffic will only serve to increase safety concerns for attendees of the schools and an adverse effect on air quality. Site Access There is a consideration in the plan that site access might be achievable via an 'improved' Gate Head Lane route. I would first point out that Gate Head Lane is a 'Private Road' and not currently under the auspices of the Council regarding its upkeep or ownership. It is also a narrow winding road with stone walls either side.Modifying this road for access and retaining any semblance of its current identity would appear to be completely impractical.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Information is difficult to find and the relevant areas of the Calderdale Council website hard to locate and not easy to navigate.

Suggested Modifications:

The scale of this plan involving the building of up to 600 houses in the area is inappropriate for this Green

Belt site and the proposals should be withdrawn on the grounds that "exceptional circumstances" to justify it proceeding are unproved. Any additional housing developments in this area should be on a very small scale only and appropriate to fit in with the existing environment.

Comments:

Additional Evidence Link:

Comment ID **HRU1587**

Site ref (if applicable): **LP0952**

Person ID: **1244129**

Name: **Mrs Kyrie Travis**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

The Local Plan does take into account paragraph 177 of the NPPF and the associated PPG in the Sustainability of Greenbelt Sites. According to NPPF Paragraph 143 it states 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' And I do not feel that there are any very special circumstances for this site.

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREEN BELT The site satisfies multiple criteria for Green Belt. It is a known wildlife corridor, offering a home to countless animals and birds that would all be displaced. Residents in the area have noted sightings of bats, badgers, foxes and other animals, as well as lots of birds and surely, we should be working to protect these areas and the animals that live in them. Calderdale Council stated that Local Plan will only use 2% of the Green Belt but the proposed development in our area of Greetland is 38% of our Green Belt which is outrageously disproportionate. Especially when there are so many brownfield sites which could be used instead. **NATURAL FLOOD DEFENCE** I feel that one of the fundamental points to raise is the fact that the fields, which make up the greenbelt, act as natural drainage areas. The rain we experienced in Halifax, and the subsequent flooding, both in 2015 and more recently on Saturday 8 th and Sunday 9 th February 2020 is an example of how important pieces of land like this are to act as natural flood defences. If this land was built on where would all the excess water go? Probably to already built up areas, causing unknown levels of damage and chaos to existing residents. We only need to look on our doorstep, at areas like Sowerby Bridge, Mytholmroyd and Hebden Bridge, and how devastating the flooding has been to see the potential impact this could have in our own community. A video posted on social media on 30 th January 2020 highlighted Calderdale Councils bid to combat a Climate Emergency, which seems highly contradictory. A spokesperson on the video even mentions that in Calderdale we are -"vulnerable to extreme weather events" including flooding" So the Council are clearly aware of the problems in the local area and developing natural flood defences is certain to make this even worse. Surely if the local Council have recognised that there is a problem in the borough then plans to develop green belts sites shouldn't even be considered! **TRAFFIC CONGESTION** As a former resident of Rochdale Road in Greetland and a current resident of Saddleworth Road, I know all too well that traffic congestion in the area is a real problem. The area cannot cope with the current volume of traffic which travels through the area, particularly in West Vale and smaller country lanes such as Scar Bottom, on a daily basis so it is difficult to image what the area would be like with so many more vehicles. **LOCAL INFRASTRUCUTURE** Another major

concern is the local services which support the area, such as the doctor's surgeries and Greetland Primary School. Only recently I visited my midwife and was asked to book a blood test at the surgery within 2 weeks of the appointment, but the surgery didn't have an appointment for 5 weeks! Resulting in a trip to the local hospital so this could be done within the required timescales. It's difficult to envisage how the area could cope with so many more residents, all requiring access at some point to these services in the local area. It's clear to see from the number of people objecting to these plans just how important the greenbelt is to the local community. So many people are passionate about saving this and it seems ridiculous to even be considering greenbelt sites when there are so many brownfield sites which could and should be considered first. Once our greenbelt is developed and built on it is gone forever and we need to protect areas like this, which offers habitats to wildlife and help to avoid potentially devastating flooding.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

The council have made no effort to advise us of the proposed development of this site, we have received nothing through the post, via email or seen anything in the local area.

Suggested Modifications:

I would suggest removing this site from the Local Plan

Comments:

Additional Evidence Link:

Comment ID **HRU1608**

Site ref (if applicable): **LP0952**

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 Local Plan does not address the implications of the National Planning Policy Framework, especially, NPPF Para 177 and the associated PPG in the Sustainability of Greenbelt Sites. According to the NPPF Para 143 under 'Proposals affecting the Green Belt' it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' The very special circumstances are non existent in this site. This development would definitely contribute to future flooding in the area. The plans have in no way had any in depth consideration and the impact on the infrastructure, environment and community will be devastating. One of the Greetland councillors - Marilyn Greenwood stated that she was not even told about the Planning Meeting when this plot was added!

Do you consider the plan to be Sound?: **No**

Sound Reason:

Points of Objections Air Pollution Flooding Infrastructure Wildlife Traffic Congestion Loss of Public Space
1 Air Pollution The severe increase in traffic (potential for 1200 additional cars which could equate to 2400

journeys each day) down an already congested Saddleworth Road. Already in peak periods the traffic backs up Saddleworth Road for at least ¼ mile with engines running! No air quality assessment has been undertaken in this area so we don't even know the extent of air pollution before the proposed development. Greetland Academy has the playground for nursery children right at the side of the road ; goodness knows how the proposed development will impact on these vulnerable, very young children which goes against the Governments strategy on air quality. 2 Flooding The area concerned floods at least once a year in varying degrees ; the worst instances have been Boxing Day 2015 and recently 9 th February 2020, the development will have a significant detrimental impact on flooding. The run off into Black Brook will cause serious downstream effects, for example, the floods of 9 th February saw Greetland Cricket Club, Heath Rugby Club and Clayhouse Park all under water ; so it is hard to understand how any flood plan could mitigate against the risk of even more severe flooding in West Vale leading to major issues for all the businesses and residents. It is impossible to understand how the proposals in the local plan can be in any way aligned to the recent declaration by Calderdale Council of a climate emergency. These proposals will inevitably lead to a flooding emergency, probably not what the Council had in mind by its declaration. 3 Infrastructure The development has only one road in and out and all the residents would have to use their cars as the development is not on a regular bus route ; again going against Government Transport Policy. Local schools are over subscribed meaning parents will have to use their cars to take children to schools out of the area. All doctors surgeries are currently full and one is soon to close again impacting on the two remaining local ones. Other developments in the area have been mainly 3 and 4 bedroom houses (not affordable housing for local people). This type of housing attracts commuters who typically work in Leeds or Manchester and will therefore have to travel to the motorway via West Vale or Ripponden neither which can cope with traffic as it is today! 4 Wildlife The local wildlife will be decimated by any further development particularly birdlife such as Herons, Kestrels, Kingfishers which are seen very regularly flying around the area. 5 Traffic Congestion It is already extremely difficult to pass through the traffic lights at West Vale and the development will only add to the congestion both in West Vale and also Ripponden. 6 Loss of Public Space The area concerned is a very valuable green space for people of all ages to enjoy daily and is extremely popular with walkers, runners, etc. It is a really tranquil spot where people can get away from the stresses of life. It is also within walking distance of the local community and therefore people do not have to drive to enjoy the countryside.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

The greenbelt should be kept as greenbelt

Comments:

Additional Evidence Link:

Comment ID **HRU1629**

Site ref (if applicable): **LP0952**

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 Green Belt and non-Green Belt alternatives are available nearby that do not appear to have been considered. For example, there is a 6.53acre site for sale by JLL off Ellistones Lane Greetland that could be used for housing.

Do you consider the plan to be Sound?:

Sound Reason:

It is not positively prepared, justified, based on proportionate evidence or consistent with national policy. Some examples of this are: The Flood Risk has not been properly considered. The Calder Valley Catchment is a high flood risk and this site already floods in places. If this area cannot continue as a flood catchment the problems will occur further downstream. This month the Greetland Cricket Club, Bowling club, Rugby Club and Model Car Racing Circuit were all flooded. These are immediately downstream of this site. Sporting facilities in the Greetland area are the out of action for weeks. 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 new access roads and additional traffic will make this a lot worse. The nearby School will be surrounded by housing and new roads increasing pollution and destroying the habitat. Wildlife in the Green Belt and natural woodland will be unduly affected. Evidence from photographs; I attach below photos that illustrate this and maps from Environment Agency of flood risk areas earlier this month, almost all of which flooded. Flooding to the south of site LP0952 taken on Sunday 9th February 2020. Flood Alert area on Sunday 9th February 2020 when almost all the shaded areas flooded. An almost identical warning was issued yesterday, Saturday 22nd February 2020. Severe flood warnings on Sunday 9th February when much of the red and orange shaded areas flooded causing widespread problems. The red areas are fed partly by water from this site, which needs to remain as it is to prevent flooding in future. Greetland Cricket Club and nearby area which flooded on Sunday 9th February and would be at risk of further flooding if this site is developed as it is the next point downstream where the brook floods.

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/5610183>

Comment ID: **HRU1632**

Site ref (if applicable): **LP0952**

Person ID: **1244117**

Name: **Mrs Linda Littley**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

See reasons below

Do you consider the plan to be Sound?: **No**

Sound Reason:

See reasons below

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Greetland has been banded with Elland and Stainland. This is ridiculous and is not a true representation of the situation or the area . Why is this development LP0952, LP0026, LP0177, LP1625,even in the Local Plan when Brownfield sites are available (but have been removed) . I think that the local community and beyond have been greatly let down by the Council regarding the lack of information they have provided . Surely, every household in Greetland should have had information by post about these plans as the plans for all sites will affect everybody in Greetland ,surrounding areas and other areas in some some way .It is then up to them to object /not object as the case may be .I believe Calderdale Council has not given ALL the community the chance to air their views. I myself would not have known of this plan had it not been brought to my attention by a group on Facebook . I OBJECT to all the sites LP0952, LP0026, LP0177, LP1625 being part of the Local Plan for the following reasons 1. Increased chances of Flooding 2 Loss of Greenbelt , open spaces and Urban Sprawl 3. Increased levels of air pollution 4.Schools , Doctors,Dentists 5. Loss of wildlife and habitat 1. Increased chances of Flooding Building on this site which has watercourses and springs ...not good for a new development and not good for any existing properties below or next to the site when the springs are diverted elsewhere by the developers..Add to that the run off from hundreds of new properties .The extra pressure this run off will have on Black Brook ,surrounding flood plains and homes will be devastating. On Sunday 16th of February a protest walk was held by members of the community...Starting at the school down to Black Brook (where last week you would have needed a boat.....the fields were totally flooded) ,up Gatehead Lane and back down Saddleworth Road to the school taking in all of the proposed sites, Site number LP0026 ,Site number LP0177 ,Site number LP0952 ,Site number LP1625 .They will have seen the expanse of run off into Black Brook as they had to negotiate their way through it to get to Gatehead Lane. To build on this site could have catastrophic effects for homes and businesses already in this area and further afield. It just doesn't make sense. Climate change isn't going to go away but we can try to slow down the effect by not creating more problems. Do we want this beautiful valley to become another flood disaster, where people who lose everything are expected to just pick up the pieces and carry on with everyday life as if nothing has happened.The effect on a person's longterm mental health and wellbeing must be huge .Don't build on these sites, surely Prevention is better than Cure and and less expensive in the long run .If these developments were to go ahead who would be accountable when problems start arising Calderdale Council ??? Developers ? ? ?? Or will they just take their ££££££££££ and run. Does anyone actually care? Can we have answers please ? The DEFRA 25year plan states that "National flood management involves the use of a variety of measures including storing water on open land". NPPF 14 (157b) states that plans should work to safeguard land from development that is required or likely to be required for current and future flood management. The current policy and legislation on flooding states -“due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere. Chapter 14, paragraph 163 of the NPPF states: -“When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere Boris Johnson has thrown housebuilding plans into confusion, by suddenly calling for an end to construction on flood plains. Around 9 per cent of new homes in England are built on land where there is a -“high probability” of flooding ; and a recent investigation found that 10,000 are currently in the pipeline. On the campaign trail in flood-hit Derbyshire, the prime minister said: -“We've got to stop building on flood plains. We've got to stop building on areas which are vulnerable to flooding. Calderdale Council Planning

Department has a duty of care to comply with current policy and legislation on flooding. Housing should not be built on sites such as this. Now is the time to step up ,stop building on flood plains and learn by past mistakes .

2. Loss of Greenbelt , open spaces and Urban Sprawl A footpath runs across this land LP0952 from Gatehead Lane what will happen to this and others ? The purpose of Green Belt policy is 'to prevent urban sprawl' and 'to prevent neighbouring towns merging into one another.' The location of this proposed site would go against that ; there would be less clear boundaries between Greetland and Barkisland NPPF Section 13 Protecting Green Belt Land Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: 1) to check the unrestricted sprawl of large built-up areas (2) to prevent neighbouring towns merging into one another (3) to assist in safeguarding the countryside from encroachment (4) to preserve the setting and special character of historic towns (5) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Calderdale Council, in its own evidence, concludes that this area of Green Belt performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt Brownfield sites should be developed first and sites with better infrastructure links. Avoid development upon flood plains. We are compounding the existing risk by continuing to build on flood plains. The more we pave over natural areas the easier it is for water to move across the land and into the rivers. Why have Brownfield sites been overlooked ? Planning framework states that sites to be removed from greenbelt should only be done so in exceptional circumstances. What are the exceptional circumstances ?.....I can't see any . The proposed development represents a disproportionate amount of new development in Greetland . Now is the time to step up, stop building on Green Belt such as this (which helps store water and protects land below thus helping in the prevention of rivers flooding) and learn by past mistakes.

3. Increased Traffic congestion and air pollution The area has not got the infrastructure to cope with anymore traffic . West Vale is a bottleneck at the best of times . Saddleworth Road , Rochdale Road , Stainland Road are usually at a standstill. We've had 4/5 way traffic lights for weeks making the congestion worse than ever. Building these planned sites would be madness. It will be easier to go to Oldham shopping etc rather than sit in traffic trying to get to Halifax. Saddleworth Road has had a lot of roadworks recently , is this work that needed doing or is it paving the way for plans which haven't been passed yet? 600 new homes ...1200 plus more cars. I quite often see young children (vulnerable members of society) walking to school either with parents or with the Walking Bus maybe in the hope of getting some fresh air and exercise. Walking past queues of traffic with engines running is not a good way to achieve that. Even at school and pre school in the playground children are at risk from air pollution . 1200 plus more cars to add to the queues of traffic that line up outside the school on a daily basis. Air pollution causes heart problems /lung problems and others, is this what we should be doing to our children/grandchildren . A little further down Saddleworth Road is an old people's home...Woodfield Grange (vulnerable members of society) This is the introduction to the Calderdale AIR Quality Action Plan *The main reason for tackling poor air quality is to address its impact upon health and quality of life. Its effects are felt particularly by the most vulnerable members of society such as the very young ,the elderly and those already suffering from other health conditions. It is also damaging to the local economy. Poor air quality can result in loss of working days, reduced productivity, increased absenteeism from school and a drain on national health resources. * A roundabout at the top of Gatehead....really ? . Gatehead Lane is a Bridleway how will it be affected by the development? What effect will the development have on the lane in terms of disruption whilst being developed and after development. We have had enough disruption lately...it's a rural one track lane . 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. So much of our wild life is in decline we see

it on television and in the news .Loss of habitat caused by developers who are interestedÂ in one thing and one thing only Money. Let's hope Calderdale Council do the right thing and scrap these plans before it's too late for all of us. Â

Suggested Modifications:

LP0026. LP0177 LP1625 LP0952 should be scrapped

Comments:

Additional Evidence Link:

Comment ID **HRU1635**

Site ref (if applicable): **LP0952**

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, LP0952 is listed as part of Elland, which it clearly isn't. This is misleading and means it is easy for the site to be overlooked by residents who otherwise would want to state their objection. The process is far from 'simple' and is certainly not making it 'easy to get involved.' (SCI 1.3) 2) In the words of Esther McVey, Housing Minister's written policy on Green Belt land: -“Of course one of the most important environmental safeguards we have is the Green Belt. And I want to be clear that our commitment to this is as strong as ever, with any changes only happening in exceptional circumstances ; protecting the Green Belt goes beyond protection against development”“ In these circumstances, our Green Belt is not being protected. In the local plan, this site is being referred to as 'green field' when it is legally classed as 'green belt' and therefore should only be built on under exceptional circumstances and ' when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including :- making effective use of suitable brownfield sites.' (The Government White Paper -“Fixing our Broken Housing Market”“arag 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, LP0177, 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. 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. The Inspector's letter of 16 th July 2019 to the Council notes (para 14) that: ' Local plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.' The site might be 'within a 0-15 minute journey of a town centre; is within 600m of Public Open Space; and within a 15 minute journey to a GP surgery' these simple benefits are irrelevant when it takes into account that the massive increase in traffic from the combined sites will increase travel time substantially, the local GP surgery is full and may no longer be within 15 minutes due to the increase in resulting traffic; that the majority of the public open space is actually part of the local plan to be built on; that the 'cleaner air' that Calderdale is fighting for will be heavily polluted by the increase in traffic and associated pollution from our already crumbling infrastructure. Where are the benefits? NPPF (para 94) also states: 'It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: 28 a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.' Greetland does currently have sufficient school places to meet the needs of the existing community but not for the needs of potentially 600 more families. I can clearly state that no consideration or preparation has taken place to resolve the issue of school places with the local schools and, as our immediate schools are academies, they cannot be forced to expand. 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 site collects a huge amount of water which is currently helping further down the road not to flood. This site is a high flood risk site in a high flood risk area and should not be built upon. Conserving and enhancing the historic environment NPPF (para 187) 'predict the likelihood that currently unidentified heritage assets, particularly sites of historical and archaeological interest, will be discovered in the future.' Combined with site LP0177 and LP1625, this area is clearly of historical importance with archaeological finds on the adjacent site (post medieval stone skull) and historical buildings on LP0177 (18 th mill). Covering these fields in concrete and houses would not only have a negative impact on the lives of present day inhabitants but would do a disservice to the inhabitants of our past, destroying our local history irreversibly. Air pollution 'There are legal requirements and aspirational targets for levels of different air pollutants. The government recognises that protective health - and tackling air pollution - requires action, and is committed to improving the UK's air quality and reducing harmful emissions. The draft Clean Air Strategy, published in May 2018, sets out the case for action and demonstrates the government's determination to improve our air quality.' This plan totally contradicts Calderdale's clean air strategy. Habitats and biodiversity To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national

and locally designated sites of importance for biodiversity. 56; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation. 57; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity. 175. When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts) Living directly opposite this site, I am fully aware of how this area is full of natural diversity. I personally have heard owls, seen deer, herons, foxes, numerous birds of prey and even had a visit from a bat in the house. Although reports and assessments will be undertaken, no amount of adaptation or consideration for this wildlife would be better than simply just letting it be and not interfering. In the Calderdale Local Plan, land was removed from Stainland, which is far less sensitive, in terms of the risk development would pose to wildlife, biodiversity, habitat and landscape so if there is consistency in approach to planning, these sites should not be included in the Local Plan.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

As mentioned previously, Calderdale Council have done nothing to inform residents of the local plan. It could also be argued that listing all four local sites under 'Elland' and the complex method of objection were all strategies to stop residents having their say rather than co-operating with residents.

Suggested Modifications:

Removal of all Green Belt sites (LP0026, LP0177, LP0952 and LP1625) and a revision of brownfield sites for any new and existing opportunities both in our authority and within neighbouring authorities.

Comments:

Additional Evidence Link:

Comment ID **HRU1636**

Site ref (if applicable): **LP0952**

Person ID: **1243952**

Name: **mrs angela jackson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Nil public consultation in nearly 4 years about the LP. Most Greetland residents found out about the LP on a recently formed 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:

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/5610192>

Comment ID **HRU1639**

Site ref (if applicable): **LP0952**

Person ID: **931414**

Name: **Mr Edward Greenwood**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

I submit that the Local Plan is not legally compliant in the following circumstances: That reference to the Town and Country Planning (Local Planning)(England) Regulations 2012 Part 6 Sec18 (1) and (2) in that the Authority have not shown evidence that they have complied with the requirement to inform in the preparation of the plan

Do you consider the plan to be Sound?: **No**

Sound Reason:

In the matter of soundness of the Local Plan, I submit that the Authority has significantly understated its density allocations and that the Corporate Lead has not addressed this issue as promised at the termination of the Stage 1 hearing. It is stated that the density shall be a minimum 30 per hectare yet there is an instance where this is less. Also the Local Authority's Director of Regeneration stated in his report that the update cannot change except for 'typographical errors and presentation in order to give clarity' yet on the 20/1/2020 a substantial change in developable area and residential capacity was made. The Corporate Lead also stated at the termination of the Stage 1 hearing that the subject of the Aspirational Economic Growth would be addressed. There is no evidence that this has taken place in this update despite evidence that the relationship between Economic growth and Housing is tenuous and that the Growth rate is not supported by national available datasets. Your attention is drawn to the following. Para 133 of the NPPF (2019) where the essence of the Green Belt is described. The two essences are given as permanence and openness. Hence any piece of land designated Green Belt, however large or small, cannot be taken out of Green Belt status or it will have lost its permanence. Similarly it cannot be built upon or it would lose its openness. Para 136 states that, in constructing Local Plans, local authorities can alter Green Belt boundaries only in exceptional circumstances. Thus, should an exceptional circumstance be proven then the Local Authority may alter the boundaries of a Green Belt area. It should be noted that the operative word here is 'alter'. Now in which way can a Green Belt boundary be altered? To answer that question we must refer back to para 133. If the boundary were altered in such a way that it removed land from the Green Belt that would then contravene para 133 which determines the permanence of Green Belt. Thus the only boundary altering that may be done is the extension of an area of Green Belt by moving its boundary outward. ***** Mr Justice Jay in the *Calverton Parish Council v Greater Nottingham Councils* [2015] EWHC 1078 stated that :- "it would be illogical, and circular, to conclude that the existence of an objectively assessed [housing] need could, without more, be sufficient to amount to "exceptional circumstances" within the meaning of paragraph

83 of the NPPF (2012)" This judgement also applies in context of paragraph 136 NPPF (2019). R (LeeValleyRegionalPark Authority) v Epping ForestDC [2016] EWCA Civ 404, Treacy, Underhill, Lindblom LJ - "The concept of -"openness" here means the state of being free from built development, the absence of buildings ; as distinct from the absence of visual impact" [7] Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council [2015] EWHC 1078 (Admin), Jay J Richard Turney appeared for the Claimant -"Mr Turney " submitted that the fact that a particular site happens to be suitable for housing development cannot, without more , constitute an exceptional circumstance justifying an alteration of the Green Belt. I Mr Turney insofar as this goes" Suitability simpliciter cannot logically be envisaged as an exceptional circumstance. Thus the Local Plan contravenes the NPPF wherever it attempts to take land out of Green Belt status for the purposes of housing need

***** WSP Parsons Brinkerhoff Report to Calderdale M.B.C. CALDERDALE LOCAL PLAN TRANSPORT EVIDENCE BASE 2017 However there are several problems with this. First notice that the housing projection for Node 3247, New Gate Farm (276). This gives a traffic flow increase to 115%. Secondly, Note that there is no assessment of projected land from LP1407, LP0026, LP1625, LP1283, LP0037, LP0065, LP0982, LP0146, LP0951, LP0041 and LP1470. This totals a possible extra traffic flow at Exley Lane as 1929 by virtue of houses (1057), a further increase of 19%. This also does not take into account the consequential traffic flow through Stainland Road/Saddleworth Road Junction in West Vale which will have to take this traffic as well. Also there is no assessment of the input to Rochdale Road/Stainland Road junction by virtue of the output of Stainland Road/Saddleworth Road junction. Again no assessment has been made due to other sites in Greetland and Stainland Ward. Also West View has been assessed as being 87 houses where the Local Plan now shows 127 houses. Therefore I conclude that the WSP Parsons Brinckerhoff report is flawed and that CMBC cannot consult the public on incomplete and/or incorrect data. Node 3948 LP1223 Lowfields, Lacy Way, Elland due to Saddleworth Road Current Traffic 458; Expected Traffic 624; 36%increase Node 3247 Effect on Exley Lane New Gate Farm, Saddleworth Road Houses 276; Current Traffic Flow 401; Expected Traffic Flow 715; Increase 73% Ellistones Place Saddleworth Road. Houses 279; Current Traffic 783; Expected Traffic 938; Increase 20% Not included in Node 3247 assessment LP1407 26 Scar Top LP0026 67 The Gate Farm LP1625 36 Silverdale LP1283 19 Glenholme LP0037 30 Long Heys Farm LP0065 36 Nab End LP0146 31 Church Lane P0041 15 Stainland Road Included in Node 3247 assessment LP0177 279 Ellistones Place LP0952 319 Land at New Gate Further Notes WSP Parsons Brinckerhoff Technical Note 1 Sections 5.6.4 In Greetland, the area south of the Saddleworth Road is not currently served by high frequency bus corridors. It might be possible to increase service levels on existing routes. However, given the distance from existing high frequency corridors and the level of congestion at West Vale, this might be perceived as not commercially viable by operators. In addition, congestion at West Vale makes bus journeys from Greetland to Elland and Halifax less reliable Your attention is also drawn to the effect of the Calderdale CIL Charging Schedule Section 3.7 shows this site LP0952 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 246 dwellings gives a CIL contribution charge of Â£82,410. Given that the CIL legislation requires 15% to be allocated to the community for its agreed benefit then the amount realised (Â£70,048) does not appear to be sufficient to fund the mandatory infrastructure, Flood mitigation, Primary and Secondary Education, Green Infrastructure , Improvement, Highway Schemes, Public Transport Schemes, Pedestrian and Cycle Networks, Sports Leisure and Recreational Facilities and Public realm Improvements, The overall educational requirement of the sites on Saddleworth Road are approximately 600 dwellingsand using Calderdale M.B.C. education ratio of .35 per dwelling suggests school place requirement of 210 school places. This is untenable as only approximately 2 places are available at Greetland academy (Business Manager, Greetland Academy) in any one year usually due to families leaving the area. Notes: Former Car Lots on Queens Road, Pellon. This has sat derelict for years and is surely prime for re-development. Old Lane (Off Keighley Road) a Former Mill Building and land in excess of 8 acres which is prime for re development

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Unlike the original Local Plan placed before the Inspector in 2019 this update has not been subjected to discussion by full council of Councillors but has been passed by single party Cabinet alone whose portfolio holders are largely from areas unaffected by housing allocations. Also it is a mandatory requirement to involve businesses in the preparation of the Local Plan. Verbal statements imply that this has not occurred. Therefore the Duty to Cooperate does not seem to have been adhered to.

Suggested Modifications:

To rescind the update and merge with the original plan and the associated assessments such that the public can be consulted on bona fide evidence.

Comments:

Additional Evidence Link:

Comment ID **HRU1661**

Site ref (if applicable): **LP0952**

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:

In contravention with Calderdale's own set rules for building on Green belt land Likely to fail the governments new views and tests for land that is at risk of flooding and its effects on nearby land.

Do you consider the plan to be Sound?: **No**

Sound Reason:

The destruction of green belt land - when there are ample brown field sites in the wider Calderdale area that should be used instead can not under ANY circumstances be said to be 'sound'

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

No Please see attached objection document

Suggested Modifications:

The only viable modification is total rejection of the plan to build here itself.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5610217>

Person ID: **1244084**Name: **Mr Daniel Black**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

The proposed development is contrary to government policy. It does not comply with NPPF guidelines, government guidelines on the use of green field sites or government guidance on building on flood zones.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Flood Risk ; Flooding is a huge issue around Calderdale. We have seen the disruption, chaos and pure misery this causes local people as recent as 9 th February 2020 (see attached images of Blackbrook). To suggest building such a huge development above and in a flood plain, just seems completely illogical. The negative impact that will be felt on properties that are already at risk and ones that will be at risk from an increase in water runoff is beyond comprehension. For this reason alone, the development should be rejected. To even suggest increasing the risk of flooding to local residents is mind boggling. Highway / Local Infrastructure : The development will have a hugely negative effect on the already extremely busy Saddleworth road / Stainland Road and Rochdale Road / Stainland road junctions. The roads already struggle to cope with the amount of traffic from commuting, so it seems implausible to increase the traffic by a potential 1000+ additional vehicles using this route. The junctions at the Co-op on Saddleworth road and Tesco on Stainland road are already extremely dangerous for pedestrians, this danger would amplify significantly due to the increased usage from the residents of the proposed development. Parking is also a huge problem in West Vale, to increase the local population by such a large number would put the already lacking parking to bursting point and would increase risk to drivers and pedestrians safety massively. The local school has no capacity to extend, and has expressed several times that it is not willing to extend. The doctor's surgery is already packed and it can take several weeks to get an appointment. Local dentists are not accepting any NHS patients. There is also a huge shortage of police numbers for an area recently targeted by gangs of car thieves, to increase the number of potential victims of crime, would put a huge strain on an already stretched Police service. POLLUTION / AIR QUALITY ; The pollution caused from the increased number of cars on the roads is unimaginable and the health of the Junior School children would be at a high risk as would the whole community. It is a fact that increased pollution would seriously affect the health of our children both now and in future generations. Noise pollution ; The proposed development will directly, negatively affect the quality of life of local people through noise pollution for many years, due to building work and industrial machinery. This will also have an adverse effect on the wildlife that will be disrupted, particularly during mating season. Greenbelt & Wildlife - The proposal is also an inappropriate development within greenbelt land. Consideration to build such a large number of dwellings on Green Belt land is totally against all current guidelines and recommendations. Earlier surveys stated the area to be "highly sensitive" The area is a haven for Deer, foxes, Herons, bats and more recently the owls have returned. Not to mention the joy it brings to walkers. Size and density of proposed development - The layout and density of the proposed development is inappropriate to the local area, as forementioned, the infrastructure simply could not handle such an increase in residents or traffic. This development has already been rejected previously, so to regurgitate the same plans without any solutions to flooding, noise, pollution or risk to life concerns is to say the least, bazaar! 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/5610222>

Comment ID **HRU1670**

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 due to the high numbers of children present on this road, as the local primary school and preschool are both situated on Saddleworth Road, in immediate proximity to the congestion areas. Children are at an increased risk of air pollution ; this is a scientifically recognised fact. Loss of Open Space and Public Amenity ; The development would result in the complete loss of natural and semi-natural open space. The landscape would be irreversibly changed to such a degree that it would no longer attract residents to use the public right of way. The proposed development would make the public right of way unfit for purpose and unsafe for use. The risk of crime and the fear of crime would be greatly increased by the alteration to the public right of way brought forth by this development. Ecology ; There would be an unacceptable impact on wildlife habitat arising from the scale of development proposed, which is totally unnecessary given that the housing requirement is much too inflated in reality. Heritage ; No assessment has been made of heritage impact. Why has an assessment not even been carried out? Again, this points to the fact that land was entered into the plan in a rushed manner without due care and diligence.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Remove this site from the Local Plan. Increase density in Brighouse. Revisit the out-of-date, inflated housing requirement.

Comments:

Additional Evidence Link:

Comment ID **HRU1674**

Site ref (if applicable): **LP0952**

Person ID: **1243877**

Name: **Mrs Pauline Atkinson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

I do not consider that it is a sound plan for the following reasons, Infrastructure Building new houses away from amenities and town centres with no proposed infrastructure results in a negative impact on the whole planet. This is not town planning this is a knee jerk reaction to an uplift requirement in the housing numbers. The resulting extra traffic will result in extra CO2 emissions this does not correlate with the 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. There is no room for a roundabout between Gate Head Lane and Scar Bottom Lane. 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. 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 LP0952 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. The development will be more than 2KM from a train station.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Remove this site from the Local Plan

Comments:

Additional Evidence Link:

Comment ID **HRU1677**

Site ref (if applicable): **LP0952**

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 Council (2015) EWHC 1078 (Admin), Jay J - where Richard Turney appeared for the claimant "Mr Turney ... submitted that the fact that a particular site happens to be suitable for housing development cannot, without more, constitute an exceptional circumstance justifying an alteration of the Green Belt. I agree with Mr Turney insofar as this goes .. Suitability simpliciter cannot logically be envisaged as an exceptional circumstances". -This land is classified as "highly sensitive green belt" on the Local Plan and there is no legal justification for building on this land. It is not legal to classify Green Belt as green field on the Local Plan ; they are totally different and your own tests states all the Green Belt land identified on Saddleworth Road in the Local Plan for building meets the five test and therefore you have no legal right to change this classification. I question the legality of Greetland being placed in with Elland on the Local Plan; Greetland is a small village in the Greetland/Stainland Ward HX4 whereas Elland is a town HX5 ward. This is false representation and when you look at the building volume within this area of approximately 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 LJ -"The concept of -"openness"-here means the state of being free from built development, the absence of buildings ; as distinct from the absence of visual impact"-[7] Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council [2015] EWHC 1078 (Admin), Jay J Get

Do you consider the plan to be Sound?: **No**

Sound Reason:

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¶179). Paragraph 80 of the NPPF explains that the Green Belt serves five purposes: (i) to check the unrestricted sprawl of large built-up areas (ii) to prevent neighbouring towns merging into one another (iii) to assist in safeguarding the countryside from encroachment (iv) to preserve the setting and special character of historic towns (v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The Council, in its own evidence, concludes that the overall parcel within which the site is located performs strongly when assessed against the five Green Belt purposes, and when assessing the revised boundary of the specific site, it also performs strongly. The development of the land would be against all five functions of Green Belt but, most decisively, would see the coalescence of Greetland and West Vale and the deterioration of the identity of both places undermining the Council's Settlement Hierarchy. Notwithstanding this, the quantum of housing proposed in and around the site is undeliverable during a single plan period in plan-making terms and unsustainable in infrastructure terms in relation to the capacity of existing highways, schools and local services. Accordingly, these sites on Saddleworth Road in the existing Green Belt should be removed from the Plan as the exceptional circumstances for their release does not exist. Furthermore the proposed sites do not meet national policy with regards to flooding. Clean Air Policy ; even higher numbers of traffic would cause further pollution in what is already a bottleneck area of high congestion. And be detrimental to the health of the toddlers / young children at Sunny Bank Nursery / Pre-School whose playground is situation approximately 3 feet from this very busy main road (picture attached of congestion down this road). Saddleworth Road services many areas i.e. Barkisland, Ripponden, Norland and other outline districts and heavy goods vehicles regularly use this road e.g. Sonoco; these are high pollutant diesel vehicles and evidence shows particles of pollution fall lower to the ground making small children more vulnerable.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

To built on the Green Belt sites proposed in the Local Plan would totally change the nature / look and openness of the village in a very detrimental way to both residents and wildlife in this wildlife corridor whilst also being illegal due to the flooding and protected Green Belt policy in the NPPF.

Suggested Modifications:

N/A

Comments:

Additional Evidence Link:

Comment ID **HRU1685**

Site ref (if applicable): **LP0952**

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 development is situated within the flood plain of the Black Brook, has the Crawshaw Clough running through it and is 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. The Environment Secretary has stated that extreme rainfall events such as this will become more frequent as a consequence of climate change. Therefore flood plains will become ever more important to -"slow the flow" and reduce the peak river levels further downstream. Flooding regularly occurs at the confluence of the Calder and Black Brook in West Vale. To build houses here, even with the inclusion of SUDs, is inappropriate 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 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 **HRU1694**

Site ref (if applicable): **LP0952**

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 believe this land should be removed from the local plan and other brownfield sites identified instead

Comments:

Additional Evidence Link:

Comment ID **HRU1726**

Site ref (if applicable): **LP0952**

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 regional press, and was even featured in the local press prior to the walk, as it was such a huge issue within the community. All land in the proposed plan was walked along during the walk. The NPPF asserts the importance of protecting areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason. This applies to the public right of way down the side of the primary school, and along Black Brook. These policies must be effectively adhered to, or they become pointless in their existence. This land is classified as highly sensitive land on the Local Plan. Along Black Brook, we currently have a wildlife corridor, which is further testament to the beauty and tranquillity of the area which the proposed development would unavoidably decimate. The introduction of non-physical disturbances to the wildlife and protected species in our area, such as noise, vibration, visual presence, human presence and light pollution, in combination with increased air pollution, given that the proposed development is in a disproportionately highly concentrated area along a condensed stretch of one road, would have disastrous effects on the wildlife corridor. In effect, we would lose much of the life we currently see along this vital public amenity. The NPPF states, under the section addressing Habitats and Biodiversity, paragraph 174, that the Local Plan must, 'protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity'; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation.' The way in which this plan proposes to impose such a largescale development along the stretch wildlife corridor, when less sensitive land was removed from the updated plan, is in direct opposition with the NPPF. Developing the land on this site would take the form of a negative response to the local context of this amenity. This proposal, by way of its drastic removal of open space ; directly related to this public amenity, unreasonably compromises the way in which the community routinely takes part, on a daily basis, in legitimate recreational activities along the public right of way. Activities and community groups like 'Little Wanders,' currently use the public right of way amenity, that stretches the length of the proposed development, which is not an unreasonable expanse of land to protect. These community walks, geared at allowing young children and their families access to free exercise and social interaction, are incredibly important to the health and wellbeing of our community. The children who participate are allowed to become more in touch with their environment than they routinely are in our ever-increasing digital world. As a result, the children become better integrated into society and are more committed to protecting the environment. It is important that the next generation is educated about their environment, within their environment. In this way, the Green Belt serves as a place of education and a means of bolstering the community. Calderdale has been identified as a deprived council. The latest government figures show that Calderdale is in the top quarter of most deprived authorities in the country. There will be serious detrimental impact on the wellbeing of the residents in this one, small area of what has been classed as a deprived council. This type of facility serves to protect and bolster mental health within the community. As stated on the Gov.UK website, 'A new study has been published by Natural England which reviews the benefits and outcomes of approaches to green care for mental ill-health'; A report published February 9 2016 shows that taking part in nature-based activities helps people who are suffering from mental ill-health and can contribute to a reduction in levels of anxiety, stress, and depression.' At a time when mental health is arguably at crisis point, designated areas where individuals and community groups know they can visit are invaluable. Designated spaces like the popular amenity public right of way in Greetland, which runs alongside our precious wildlife corridor and Black Brook, can afford communities free and easily accessible facilities, facilities which the council can cheaply and effectively work into mental health schemes. The importance of this site is due to the amount of biodiversity of wildlife concentrated in this area. The NPPF states that the Local Plan should take account of climate change over a long period of time, including factors such as flood risks, changes to biodiversity and landscape. The NPPF also states that new development should be

planned to avoid increased vulnerability to the range of impacts arising from climate change. To put the wildlife corridor at an increased risk of survival, and potentially decrease biodiversity in the area, at a time when climate change already poses a risk to it, especially given that the land is at high flood risk, would be in direct opposition to that which the NPPF sets out to protect and preserve, and for good reason. For this reason, development on this land is not environmentally sustainable. Paragraph 175 of the NPPF states that, 'When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts)' which the community is immediately able to jump in with stating that this cannot be said to be the case in the Calderdale Local Plan, as land was removed from Stainland, which is far less sensitive, in terms of the risk development would pose to wildlife, biodiversity, habitat and landscape. In this way the land in Greetland put into the Local Plan is not compliant with the NPPF.

Flooding: The Land put forward in the Local Plan is unsustainable. One of the reasons for this is because it is within a high-risk flood area. This factor has not been given anywhere near enough scrutiny at the plan-making or decision-making stages. The housing estate, Woodfield Drive, to the east and in immediate contact with plot LP1077, is at a direct, increased risk of flooding. Flooding is so bad in Calderdale that the Army was called in, in February 2020, in a bid to help protect persons and property from yet another severe flood. The way in which the Calder Valley routinely experiences flooding can be best understood by Labour Council leader, Tim Swift, urging the Government to grant Calderdale urgent assistance by recognising it as a 'Tier 1' authority getting extra funding support because it is one of a small number of areas of the country at "sustained risk" of flooding.' The NPPF states that planning policies and decisions should promote public safety and take into account wider security and defence requirements by: a) anticipating and addressing possible malicious threats and natural hazards... This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.' In February 2020, our community saw Black Brook turn into a raging torrent of water that posed significant danger to both life and property. There is not a risk of flooding in this area, but a certainty of it. A certainty that grows year on year with the ever-increasing threat of Climate Change. The way in which this valley, with its steep sides, floods is a natural hazard. Residents on Woodfield Drive routinely have to take measures to prevent their homes from flooding. We have photographic evidence of how this is a routine battle that residents face, and not enough is being done to help prevent this from happening in the future. To build on this land would sign residents and the community wider community to an unbearable, unavoidable fate. The NPPF states that, 'due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere.' The topography of our area would not allow for it to be any other way than to increase the risk of flooding to the existing community. The sloping grassland, the trees and the flat flood plains of the land put forward in Greetland in the Local Plan retain an immeasurable amount of water when it really matters. No amount of 'mitigation' can compete with this. To build on this land would have catastrophic and irreversible ramifications, and not just for the immediate area, but for the areas further downstream currently protected by this precious land and the way it currently functions. Residents in Bradley were in the local press this week to express their despair at how they believed a development had caused flooding to their property. This is what a spokesperson for the residents had to say in the local press, "œWe never had flooding problems when this site was a meadow and did its job as a meadow and soaked up rainfall, releasing it slowly into the woods. Due to the topography of the area and surrounding areas, we have already experience catastrophic destruction, as seen in 2015 when a major bridge, Elland Bridge, was destroyed by flood water, causing huge disruption and economic expense. Last weekend, flood water carried a shipping container, from Greetland, downstream until it eventually crashed into Elland Bridge. The Bridge had not yet been open three years since being rebuilt due to the last flood. The council had to

inspect the bridge for structural damage after last weekend. How can building houses in a high-risk flood area be inline with the NPPF's golden thread of sustainability? The economic ramifications in the form of destroyed infrastructure alone is enough to void this development proposal. Prime Minister Boris Johnson has even, on multiple occasions in the press, called for councils to stop allowing building on flood plains. As a community, and as the people who experience first-hand, all year round how unpredictable the water system is in this area, we are constantly reminded of the topography of our landscape and the surrounding areas, and the impact it already has on our lives. Over thirty million pounds has so far been spent on flood defences in Calderdale, and still we are having to have the Army called in to help protect us from flood water. It is not right to build on the land in Greetland put forward in the Local Plan. Flooding cannot be mitigated against in this area. The land as it stands, is helping to prevent further disaster, and must remain as it is. To even suggest altering the way in which this land functions is an inappropriate and irreversible gamble. It is not fair to gamble with the lives of the community, when the community is so opposed to it. The NPPF states that the Local Plan should take account of climate change over a long period of time, including factors such as flood risks, changes to biodiversity and landscape. The NPPF also states that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. To so dramatically change the function of the landscape of the sites put forward for development in Greetland would completely disregard the risk climate change poses to the community on the form of flooding. For anyone to tell us that the huge volumes of water we regularly see on this land will not affect existing property when it is disturbed, we would need to see evidence of prolonged, extensive surveying carried out all year round, and for a number of years. Understanding our complex water system, further complicated by our intricate system of natural underground springs is not easily, if ever, achievable. A testament to this aspect of our topography is evident in the numerous roads and lanes named after their relationships to water and springs. Much of what causes the problems we face in this area is hidden underground in a network, or labyrinth, of fresh water springs. How can we predict how the water will behave after its usual pathways have been disrupted? We have already witnessed how smaller developments in the area, having interfered with the underground water course, have had disastrous impacts on other surrounding properties. If you would like to see photographic evidence to prove this, we have it prepared for you. Green Belt: The Green Belt Review carried out in 2017 considered all three of the sites ; reference numbers 065 and 339 in the review. The conclusion of this review was that all of the sites performed strongly in terms of their Green Belt function, meeting at least 3 of the 5 purposes of including land in the Green Belt. Those 3 purposes were: To prevent neighbouring towns from merging into one another; To assist in safeguarding the countryside from encroachment; To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The 0952 allocation was also considered to meet a further purpose in terms of checking the unrestricted sprawl of large built up areas. We would argue that all three of the sites should be considered to serve this purpose, it makes no sense for just 0952 to do so but 0177 and 1625 not to, given they are all inextricably linked. Development of all sites would result in the unrestricted sprawl of the large built up urban area of Greetland. The three site assessment reports carried out ahead of the consultation on the Local Plan Publication Draft in 2018 concluded that the land represented the "œmost sensitive Green Belt"œGiven this there is no planning policy justification to ignore that impact ; importantly carried out as part of a thorough Green Belt Review of the borough just over 2 years ago ; and now consider the sites suitable for allocation for housing. Such allocation would conflict with key purposes of including land in the Green Belt and would have a fundamental adverse impact on the openness of the Green Belt. Schools: Paragraph 94 of the NPPF states that 'It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: 28 a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and b) work with schools, promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.' The Local Plan in Greetland has not seen any of this work done in relation to the local junior schools. As far as parents and the local community is

aware the local school has not been consulted on the Local Plan. Due to the fact that The Greetland Academy and West Vale School are academies, they cannot be pushed to expand, so perhaps this is why they have not been consulted, however, this is in direct opposition to the National Planning Policy Framework, and therefore not compliant. We know that the primary school is already oversubscribed. The scale of proposed development would completely overwhelm an already oversubscribed school. Children already living in Greetland may face a situation where there is no place available to them at their local junior school. There is also a very real increased risk posed to the children of Greetland Academy, should the proposed development go ahead. Paragraph 109 of the NPPF states that, 'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.' I feel that it is my civic duty and moral responsibility to inform the inspector of the current unsafe road conditions on Saddleworth Road, in the surrounding area of the school and preschool. The school is situated on Saddleworth Road, which is already a very busy road, currently with its own safety and air quality concerns. At school drop-off/pick-up times, Saddleworth is reduced to a single lane due to the parked cars of parents, and with significant and unusually high numbers of HGVs using this road, due to the recycling plant further along the road, this makes for a hostile level of traffic and congestion at busy times, and these are the times when the children of our community are on the roads and at the greatest risk. Any further increase to traffic, especially such a significant one, due to the fact that the development is proposed for this road, and this road alone, would render the road unsafe, specifically due to the number of children on the roadside. Parents already worry about the safety of their children while using this road. Those in power should be taking measures to make the road safer, not putting vulnerable children at an increased risk. When a child is killed on this road, it will be too late. Due to the level of traffic and the type of traffic, namely the large number of HGVs, this road is not suitable for Local Plan development, especially when we consider the risk it would pose to young children. On top of this increased risk of a fatal road traffic incident, the proposed development would also introduce a dramatic increase in air pollution. The proposed development would create a dangerous environment for pedestrians, with no option for mitigation. This road is unable to be made wider. To slow traffic down would only further exacerbate congestion and air pollution in the air that the community and its children have no choice but to breathe. Traffic Impact: In the Council's individual assessments of the sites which resulted in them all being filtered and not taken forward for housing, the consultation from Highways England advised that the development of the scale envisaged would have a significant adverse traffic impact on the Strategic Road Network. Given this how can the sites now be put forward for allocation for housing when nothing has been done to either challenge those comments or address them? The sites in Greetland have not had traffic assessments carried out. Sites elsewhere in Calderdale have been filtered from the Local Plan due to traffic constraints. Given the existing levels of high congestion at the West Vale traffic lights, why has assessment not been carried out? Why has air pollution not been measured? Is it because the sites in Greetland are too appealing to developers, given the high house prices in the area, and some thing like a traffic assessment would throw a spanner into the works, as it were? Where is the Traffic Plan in the site reports for these sights? These sites have been allocated without appropriate assessment of local road networks. To say that the cumulative traffic impact is being assessed is not sufficient, especially given the scale of the proposed development. To increase the amount of traffic on Saddleworth Road, when it is already so heavily congested, and with a high volume of HGVs, by any amount of traffic, without a proper assessment is not a sustainable practice in planning terms. Air pollution: My final point I ask you to consider is the impact of the development on the health of the people in this area, particularly those who live on Saddleworth Road, especially our children, who spend the majority of their waking hours in the primary school and preschool, which are both situated on Saddleworth Road. Our ward already has the highest percentage of cars per household, and this is set to rise by a disproportionately high amount, in line with the disproportionately high number of houses proposed in the plan. A development site, within Calderdale, was thrown out for precisely the same reason. Yet, our site remains, even with such a high - the highest - percentage of cars per household. Due to the lack of public transport, because we live in a semi-rural area, the community does rely heavily on

transportation by car, which would unavoidably be the same case for the new residents, should the development go ahead. A wooden fence and a strip of pavement is all that separates the children from the road. A catastrophic increase in air pollution, which is in direct opposition with government legislation to reduce air pollution, is further exacerbated by the fact that Saddleworth Road is unable to manage the current level of congestion. We have extensive photographic evidence of this. Such a disproportionately high increase in air pollution will have unthinkable implications for the children of our community. If the government has set targets to reduce air pollution then it does not make sense to allocate such a vast proportion of the overall planning to one area, along one road, where the pollution in the air will become concentrated and toxic. Calderdale Council have taken steps to reduce air pollution, but the air quality in our area has not been tested. What we as a community cannot support is a huge rise in concentrated air pollution, this is air that young children are forced to 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 reason why children are particularly vulnerable to the effects of air pollution is that they breathe more rapidly than adults and so absorb more pollutants. They also live closer to the ground, where some pollutants reach peak concentrations ; at a time when their brains and bodies are still developing.' These are points highlighted in the Clean Air Strategy 2018. While we do need to ensure economic growth, we also need to realise the 'cost of air pollution on health,' as stated in the Clean Air Strategy 2018. 'There are legal requirements and aspirational targets for levels of different air pollutants. The government recognises that protective health - and tackling air pollution - requires action, and is committed to improving the UK's air quality and reducing harmful emissions. The draft Clean Air Strategy, published in May 2018, sets out the case for action and demonstrates the government's determination to improve our air quality.'

<https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-air-pollution>

The above is taken directly from the government websites. The proposed plan is directly opposed to the Clean Air strategy, as the amount of land allocated on Saddleworth Road is disproportionate to the amount of land Calderdale has to allocate as a whole. The overall air pollution will be harmfully concentrated on this one road, a road with an unusually high concentration of children so close by for so much time. Each child spends approximately 7 hours a day on this road, including walking to and from school, which amounts to 35 hours a week. 35 hours a week they will be forced to 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 **HRU173**

Site ref (if applicable): **LP0952**

Person ID: **1241848**

Name: **Mr Eric Williams**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

See 'Sound'

Do you consider the plan to be Sound?: **No**

Sound Reason:

Calderdale Council have been extremely disingenuous with regard to a number of things in their Local Plan proposals: Elland? For some reason they have lumped Greetland with Elland and Stainland as though they were one district of Calderdale. They are not and never have been. This has the effect of making the increase in housing modest for the larger area, when in fact the additional proposed housing would increase Greetland's housing by a further 20%! This would be an unworkable ridiculous increase on the roads and services of the area. There are only two main roads through Greetland, both of which already

have extremely serious congestion problems, in particular around the school buildings, and at the bottom of where they join West Vale. The school is already full and oversubscribed and would lead to significant increases in traffic travelling both out of, and into, the area. Maps! The maps on the Council websites are deceitfully wrong. When you click 'Green belt' it does not show the proposed areas as green belt, which they absolutely are. The same is the case for 'Wildlife habitat network'. This whole area is part of this wildlife corridor. The Council's obscure view implies that the proposed area is free of these labels, trying to conjure an untruth, like a magician. Priorities ; Housing vs Climate Emergency Calderdale Council at the start of 2019 'declared a Climate Emergency', 'A bold move', 'to step up action to tackle climate change' . The announcement included focus on 'significant impact on our health and wellbeing', 'air quality' and 'wildlife habitats at risk' with a commitment to taking a lead locally. If this is the case then why are they putting housebuilding above wildlife, serious air pollution and the health and wellbeing of the Greetland community. The area concerned is an area of outstanding natural beauty. A place to go to get away from the ever-increasing pressures of daily life. On one recent walk along the brook, my wife and I saw; a dipper, a kingfisher and 4 herons. Of course, the dipper and the kingfisher were in the brook itself, but the herons were in the air and all landed in a field around 50 metres from the brook (i.e. not in the proposed 10m corridor). We have visited both the Lake District and the Yorkshire Dales many times each year over the last 40 years and have never seen such a spectacle on one walk. Just in 2020 we have seen a large amount of wildlife in the fields included in the proposal, including; pheasant, thrush, a variety of tits and just last week - a very large fox. The Council should be putting the right things in the right places. This proposed area is perfect for the increase in woodland needed. This would not just be a real positive benefit to the inhabitants of Greetland, but the whole of Calderdale and beyond. Flood risk?! Calderdale Council indicate the area may be a flood risk. It is not, it is a flood area. There have been many serious floods on the proposed land over the years (& proportionately more over recent years). As far as I was aware, green belt land should only be built on in exceptional circumstances - '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' . I do not believe and am not aware of any evidence shown by the council that satisfies this. If the need is really there for such an increase in housing in Calderdale (which is still questionable), there are many brownfield sites that are not being considered and many other non-greenbelt sites that have a lower impact on the environment.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

See 'Sound'

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1730**

Site ref (if applicable): **LP0952**

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 0952), together with the adjacent/nearby proposals LP 0177, LP 0026 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 0952, together with the adjacent/nearby proposals LP 0177, LP 0026 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 **HRU1740**

Site ref (if applicable): **LP0952**

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 **HRU1745**

Site ref (if applicable): **LP0952**

Person ID: **959163**

Name: **Mr Richard Brady**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

The choice of sites for the local plan is potentially being affected by whether a developer is on board, if so this may be potentially unlawful under planning laws and needs to be investigated.

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:

Lack of notice and consultation on the process of reintroducing sites when instructed to do so by central government.

Suggested Modifications:

Advise central government that the council does not accept the increased requirement for housing as the economic model on which it is based has been made obsolete by Brexit. Revise the plan with less Green Belt and more housing allocations in dilapidated parts of Halifax which are an embarrassment to the Borough.

Comments:

Additional Evidence Link:

Comment ID **HRU1746**

Site ref (if applicable): **LP0952**

Person ID: **1244133**

Name: **Miss Julie Carter**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Consultation has been very poor. There has been nothing clearly available that would be appropriate for anyone with a learning disability or communication difficulties as per the Accessible Information Standard.

Do you consider the plan to be Sound?: **No**

Sound Reason:

GREEN BELT. Why has brownfield land not been considered? Green belt should be protected and according to Calderdale Council, Greener living is a top priority. The plans put the current and future wildlife at risk. FLOOD PLAIN. Surely no one in their right mind would buy property on this site. Has the developer or anyone from Calderdale Council seen it since the beginning of February? Any flood mitigation put in place will merely move the problem further down the area. TRAFFIC/ AIR POLLUTION. Saddleworth Road is already incredibly busy and varies in speed limits. This does not stop drivers from irresponsible driving parking, particularly around Greetland Academy. This plan would be putting children's health and safety at risk. INFRASTRUCTURE. The proposed development is completely disproportionate to the size of the village. Greetland is a village not a town. The local school is full. Dentists have long waiting lists. It is already almost impossible to get a GP appointment and GP recruitment is known to be in national crisis with a crumbling

A&E system as a consequence.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

This objection procedure is difficult to navigate even when computer savvy. Calderdale Council appears to be putting up as many barriers as possible to prevent people from having their say.

Suggested Modifications:

remove this area as one for development from the local plan

Comments:

Additional Evidence Link:

Comment ID **HRU1772**

Site ref (if applicable): **LP0952**

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 0952), together with the adjacent/nearby proposals LP 0177, LP 0026 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 **HRU1774**

Site ref (if applicable): **LP0952**

Person ID: **1244202**

Name: **Mr Adam Kershaw**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

The site requirements relating to the release of the land from Green Belt is not legally compliant, adequately prepared, fully justified or consistent with National Planning Policy Framework (NPPF) and accompanying Guidance(NPPG). Procedural and Legal Compliance Issues I am concerned that Calderdale council has not adhered to legislation set out in The Climate Change Act 2008 (2050 Target Amendment). I am not able to see any evidence of additional measures to respond to climate impacts of above-trend growth in employment and housing. In addition to this, I am concerned about issues actually acknowledged by the Council itself, particularly regarding traffic impacts and flooding. For issues surrounding the proposed development, regarding traffic and flooding, it would appear that the proposal is not, according to the NPPF, sustainable. When the harm identified is taken into account, the proposals are clearly deemed unsustainable. The land in this site is also unsuitable for development due to issues relating to Green Belt and Heritage Assets, and recent planning case law determined by High Court Judgements relating to the siting of Listed Buildings. Further to this, the proposals are not supported by Housing Infrastructure Fund (HIF) from Homes England, and the inadequacy of existing infrastructure to accommodate this level of growth confirms that the proposals are unsustainable. This has even been publicly recognised by our local MP, Craig Whitaker. Flooding Certainty Part of the site is allocated as Zone 3a and is at the bottom of the chain for development, with development only acceptable if sequential and exceptions tests are passed. There have been no such tests carried out. There is evidence that the site floods both severely and routinely. The way in which this happens actually protects property and infrastructure from harm caused by flooding. Mitigation can not equal or surpass the work currently done by this land as it stands. Black Brook routinely bursts its banks, taking hold of entire expanses of meadow land, posing significant danger to both life and property. There is extensive photographic and video evidence of this. Our community begs you to recognise that there is not a risk of flooding in this area, but a certainty of it. The way in which this site faces routine flooding has been well documented on the regional news. National news is now starting to contact the pressure group. This is something we have not gone looking for, but instead finds us, due to our level of flood risk, or 'flood certainty' as it is now known within the community. We are a small village in Calderdale Yorkshire, why are we being contacted by national media outlets? The issues we face here are real and they are huge. The entire span of land on LP0177 including South of Greetland Academy School was severely flooded in February 2020 (evidence attached). Greetland Pressure Group has attracted attention from both local and regional press and TV with regards to recent flooding and proposed development. This land routinely floods and would leave any proposed development at risk along with any access roads. Development sites LP0177, LP0026, LP0952, LP1625 are critically important in alleviating any further flooding issues by soaking and storing surface water run off

from the large amount of natural springs in the area. The Army was even called into Calderdale, in a bid to help protect people and property from yet another severe flood, also in February 2020. The way in which the Calder Valley routinely experiences flooding can be best understood by Tim Swift's, Calderdale Council Leader, words when he urged the government to grant Calderdale urgent assistance. Swift would like to see Calderdale recognised as a 'Tier 1' authority, which would entitle Calderdale to extra funding support, as 'Calderdale is one of a small number of areas in the country at "sustained risk" of flooding.' The head of our council has even recognised the significant threat we face in this area. The topographical context of the proposal in Greetland lends itself to increased flood risks, due to the abundance of natural springs, the water course, and the steep valley sides. All of the factors that contribute towards flooding are against us. Flooding in this part of Greetland is a certainty that grows year on year with the ever-increasing threat of Climate Change. The way in which this valley, with its steep sides, floods is a natural hazard. Residents on Woodfield Drive had to take action to prevent their homes from flooding in February 2020, and not for the first time either. We have photographic evidence of how this is a routine battle that residents face, and not enough is being done to help prevent this from happening in the future. To build on this land would be to sign residents and the community to an unbearable, unavoidable fate. The NPPF states that, 'due to recent wide-scale flooding incidents in the country and the ever increasing threat of climate change, new development in flood risk areas would only be allowed when it is exceptionally necessary, and when it does not increase the risk of flooding in the development's community or elsewhere.' The topography of our area would not allow for it to be any other way than to increase the risk of flooding to the existing community. The sloping grassland, the trees and the flat flood plains of the land put forward in Greetland in the Local Plan retain an immeasurable amount of water when it really matters. No amount of 'mitigation' can compete with this. To build on this land would have catastrophic and irreversible ramifications, and not just for the immediate area, but for the areas further downstream currently protected by this precious land and the way it currently functions. Prime Minister Boris Johnson has even, on multiple occasions in the press, called for councils to stop allowing building on flood plains. Part of Site LP0177 lies within flood zone 3A ; the highest classification of flood risk in terms of land that could potentially be considered appropriate for development. The zone 3A is immediately adjacent to the western and southern boundaries of Woodfield Drive. The land immediately adjacent to the whole southern boundary of the proposed 3 allocation sites is also allocated as flood zone 3A. The photographs that are attached to this submission show the flooding that has occurred on the land. Given that the land is not only identified as being at risk of flooding but is also evidenced as having flooded, there is no justification in land drainage terms to bring these sites forward for housing. Paragraph 155 of the NPPF clearly states that, -"Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk" In putting these sites forward the Council is ignoring the policy requirements of the Framework. The reports compiled by the Council for all four sites on Saddleworth Road when putting together the Publication Draft version of the Local Plan in 2018 concluded that all three should be filtered (i.e. not taken forward as housing allocations) because of ; amongst other things ; flooding and drainage issues. Sequential and exceptions tests would have been necessary to demonstrate that the sites were suitable for and safe to develop. Although the Planning Inspector identified an insufficient supply of housing land following the Stage 1 examination process, it should not simply follow that additional sites are now allocated without a thorough assessment being made as to their suitability to counter the reasons why they were initially filtered. The four sites on Saddleworth Road seem to have been put forward as a simple response to the Inspector's comments with no consideration of the flooding and drainage issues associated with the land. It is clear that there are blurred lines of responsibility and accountability when serious flooding issues arise between Developers, Councils and the Environment Agency. We need accountability when reckless planning leads to catastrophic flooding issues. Green Belt The Green Belt Review carried out in 2017 considered all three of the sites ; reference numbers 065 and 339 in the review. The conclusion of this review was that all of the sites performed strongly in terms of their Green Belt function, meeting at least 3 of the 5 purposes of including land in the Green Belt. Those 3 purposes were: To prevent neighbouring towns from merging into one another; To assist in

safeguarding the countryside from encroachment; To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The 0952 allocation was also considered to meet a further purpose in terms of checking the unrestricted sprawl of large built up areas. We would argue that all four of the sites should be considered to serve this purpose, it makes no sense for just 0952 to do so but 0177, 0026 and 1625 not to, given they are all inextricably linked. Development of all sites would result in the unrestricted sprawl of the large built up urban area of Greetland. The four site assessment reports carried out ahead of the consultation on the Local Plan Publication Draft in 2018 concluded that the land represented the -“most sensitive Green Belt”- Given this there is no planning policy justification to ignore that impact ; importantly carried out as part of a thorough Green Belt Review of the borough just over 2 years ago ; and now consider the sites suitable for allocation for housing. Such allocation would conflict with key purposes of including land in the Green Belt and would have a fundamental adverse impact on the openness of the Green Belt. Erroneous justification of housing requirement for Green Belt release Green Belt boundaries should only be altered in 'exceptional' circumstances. This land has been identified as the Most Sensitive Green Belt. The Calderdale Local Plan, which has suffered from a democratic deficit throughout its many iterations, sets a target for housing based on pre-Brexit demographic evidence of Objectively Assessed Need (OAN). This means that the Green Belt as designated in the current UDP has had to be reviewed. The OAN is far too great and as it relates to out-of-date population projections used in Strategic Housing Market Assessment (and update) that have been superseded by lower projections in more recent Office of National Statistics releases that would result in a much lower housing target and the reduce the need to release the number of Green Belt sites. Further, the ambitions of the Council for annual jobs growth over a 16 year period characteristic of a constant 'boom' inflate the requirement well beyond the realistic possibility of actual delivery. It is not responsible to allocate land, including a significant amount of Green Belt release, to meet inflated housing targets based on out-of-date household projections and ambitious and continual jobs growth. The housing target needs revisiting to model scenarios reflective of evidenced-based jobs growth (rather than ambitions), up-to-date household projections (including post-Brexit population projections) and the priority to contribute to sustainable development that does not harm the environment (including the Council's Climate Emergency commitments). The Calderdale Local Plan has been overtaken by events both demographically, economically and environmentally. At this point, the Council is proposing to adopt a Local Plan that runs entirely against the corporate ambitions of the authority. It is simply the case that no plan at all (and reliance on the NPPF & NPPG to direct new developments, which would include the protection of sensitive Green Belt) would be better than the proposed Local Plan that is under examination. Disproportionate The most recent revisions to the Local Plan in response to the Inspector's letter include the addition of more Green Belt sites (including LP0026, LP0177, LP0952, LP1625) for release, which represents further unsustainable development as a disproportionate amount of the new homes proposed are across just four sites in Greetland. Indeed, 1,041 additional units of the 1,708 on these new housing sites (over 60%) are proposed in the Elland area alone. There has been substantial development of land in both Greetland and Elland in recent years. This cumulative development means that the land on Saddleworth Road is the only remaining parcel of the original Green Belt still in agricultural use. Development of the site would erode the visitor's understanding of the extent of the original manorial lands that Greetland covers. Unsustainable Development The Council's Sustainability Appraisal process to support the release of the site is inadequate. The site report states that the assessment of SA7 is 'Negative' and marked 'RED' commenting that "Overall the impact is negative as the site is greenfield and lies within flood zones 2 and 3". The site should be excluded on this conclusion alone, particularly within the wider context of the Council's recent declaration of a Climate Emergency and recent flood events. Further, the report does not grapple with the issue in the overall conclusions inadequately noting that "with regards to SA7 and flood risk, the impact is negative as the site is greenfield and lies within flood zones 2 and 3" with no specific mitigation measures identified. This does not come anywhere close to an adequate assessment to justify release for development. The Sustainability Appraisal for the Local Plan has not been mapped or measured. The benefits of, or the opportunities for, the provision of ecosystem services by the Green Belt

land directly around the urban environment are unrecorded. Section 39 of the Planning and Compulsory Purchase Act 2004 states that a local authority exercising their plan-making functions must do so with the objective of contributing to the achievement of sustainable development. Action 5 of the EU Biodiversity Strategy to 2020 requires member states to map and assess ecosystems, whilst the Minister of State for the Environment reiterates the necessity to map and value the natural capital that make up ecosystem services, specifically in urban environments, in order to improve sustainable planning. Further, the NPPF sets out a presumption in favour of sustainable development and advises that the planning system should contribute to and enhance the natural and local environment by a number of measures that include 'recognising the wider benefits of local ecosystems. Wildlife Paragraph 175 of the NPPF states that, 'When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts)' which the community is immediately able to jump in with stating that this cannot be said to be the case in the Calderdale Local Plan, as land was removed from Stainland, which is far less sensitive, in terms of the risk development would pose to wildlife, biodiversity, habitat and landscape. In this way the land in Greetland put into the Local Plan is not compliant with the NPPF. Developer Influence Profit should not dictate planning policy, at a great cost to the environment. In relation to the rest of Calderdale, house prices in Greetland are very high. The developers have not expressed an interest in the overwhelming amount of brown field land available in Calderdale, because the return on investment is so much higher when development is passed in beautiful Green Belt land, set within a village connected to high house prices. The developer is further enabled to do this because it has a monopoly on the large-scale building development taking place in Greetland. Plans have been drawn up for the different sites within Greetland, the sites have been given different codes, and yet the land is almost entirely unseparated by anything physical; essentially, to this community, the separate plots are one piece of land, irrespective of who owns the land on the land register- the development will be concentrated in one place. Different developers have been assigned to the various codes given to our continuous area of Green Belt, however, when this is examined further, it becomes apparent that the developers largely belong to the same parent company. How can Calderdale Council resist pressure from this monopoly situation? They are already under time constraints to designate land to the Local Plan. This is a toxic situation for Calderdale, and thus renders it impossible for the council to deliver the right homes in the right places. The Local Plan in Calderdale has become entirely about developer profit, and not at all about growing the local economy for local people. Severe Lack of Infrastructure Greetland School is an Academy and therefore it is not obliged to expand. In the Council's individual assessments of the sites which resulted in them all being filtered and not taken forward for housing, the consultation from Highways England advised that the development of the scale envisaged would have a significant adverse traffic impact on the Strategic Road Network. Given this how can the sites now be put forward for allocation for housing when nothing has been done to either challenge those comments or address them? The sites in Greetland have not had traffic assessments carried out. Sites elsewhere in Calderdale have been filtered from the Local Plan due to traffic constraints. Given the existing levels of high congestion at the West Vale traffic lights, why has assessment not been carried out? Why has air pollution not been measured? Is it because the sites in Greetland are too appealing to developers, given the high house prices in the area, and something like a traffic assessment would throw a spanner into the works, as it were? Where is the Traffic Plan in the site reports for these sites? These sites have been allocated without appropriate assessment of local road networks. To say that the cumulative traffic impact is being assessed is not sufficient, especially given the scale of the proposed development. To increase the amount of traffic on Saddleworth Road, when it is already so heavily congested, and with a high volume of HGVs, by any amount of traffic, without a proper assessment is not a sustainable practice in planning terms. Heritage No assessment has been made of heritage impact The site assessment reports carried out in advance of the 2018 Publication Draft identified other areas of policy conflict with all three sites ; in particular heritage, open space and sustainability. It was at that time recommended that none of the sites on Saddleworth Road should be allocated until an assessment had been made of the heritage impact. To our

knowledge that has not occurred. The sites were identified as providing valuable natural and semi-natural open space. This would be lost if the sites were allocated for housing. In terms of sustainability, a negative factor in not bringing the sites forward in the 2018 consultation was the distance to a railway station (in excess of 2kms). By definition that negative factor remains and forms part of the reason why other potential sites in the area have not been brought forward (such as site LP1089 on Rochdale Road). Open Space There would be complete loss of natural and semi-natural open space Air Pollution The homes proposed in Greetland will significantly add to air pollution. 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 Leeds City Region as a whole The Leeds City region has produced below average employment over the past 30 years but in their Strategic Economic Plan they envisage well above average growth in the next 15 years. This is extremely optimistic given that the current UNEMPLOYMENT rate in Yorkshire is 4.3% which is the second highest of any region in the UK and is currently increasing. If Calderdale's economic growth was more accurate, there would be no need to destroy precious Greenbelt land. The Council have proposed a number of alterations to its Green Belt boundaries to simply meet an inflated housing target at the cost of great environmental harm. The NPPF is clear that Green Belt should only be altered in exceptional circumstances through the preparation or review of a Local Plan. Where it is necessary to consider revision of the Green Belt, this review should be robust in its justification for any alteration ; which is critically missing. The critical importance of early and meaningful engagement and collaboration with communities in producing Local Plans, particularly where this involves altering Green Belt boundaries has not been undertaken as the site has been parachuted into the plan-making process during hearing sessions. This constitutes a serious breach of procedural compliance. A local pressure group has been set up at the last moment to attempt to deal with these issues locally and has attracted a significant amount of support. However, the community has not been given the opportunity to produce a Neighbourhood Plan. Neighbourhood Plans can be used by local people to positively shape development in their area, including establishing principles for how former Green Belt sites are developed. Summary All of the reasons why these sites were not brought forward at the Publication Draft stage remain just as relevant now. There has been no further assessment of any of the significant constraints which resulted in the sites being filtered at that stage. The only reason for bringing them forward for allocation now is based on a simple exercise of responding to a requirement to increase the housing supply. There is no justification for allocating these sites given the flood zone allocation and evidence of flooding and given the fundamental conflict with the Green Belt Review in 2017. No consideration has been given to the potential to bring forward other sites in the area that do not carry these fundamental problems. No consideration has been given either to the lack of infrastructure available in Greetland to accommodate such a significant level of new housing. The function of the planning system is to facilitate sustainable development that makes a positive contribution to the environment. It is not the role of the Council to recklessly release demonstrably unacceptable sites within the Green Belt to meet a housing target. The Inspector's letter of 16 July 2019 to the Council notes (Para. 14) that "Local Plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits". This is the undoubtedly the case here. No sensible phasing options are proposed related to release of the most sensitive Green Belt sites upon the requirement to demonstrate a five-year housing land supply even if the release could be justified. It is illogical to allocate Green Belt sites in Flood Risk Zones 2 and 3 for development before brownfield sites are fully exhausted. The immediate release of the site for development is simply not a sensitive approach to the release of Green Belt land even if it were to be appropriate. Later, the Inspector asked the Council to review the option of 'the supply of more suitable and available sites elsewhere' understanding this to be an option, however, the further work on the additional

sites considered (incorrectly by the Council) to be 'suitable and available' are not, in fact, suitable and, in any case, it has been revealed that this option on all sites on Saddleworth Road, Greetland (identified below) is simply not sustainable and the proposal is unsound. LP0026 - The Gate Farm, Saddleworth Road, Greetland, Elland, 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 regional news. National news is now starting to contact the pressure group. This is something we have not gone looking for, but instead finds us, due to our level of flood risk, or 'flood certainty' as it is now known within the community. We are a small village in Calderdale Yorkshire, why are we being contacted by national media outlets? The issues we face here are real and they are huge. The entire span of land on LP0177 including South of Greetland Academy School was severely flooded in February 2020 (evidence attached). Greetland Pressure Group has attracted attention from both local and regional press and TV with regards to recent flooding and proposed development. This land routinely floods and would leave any proposed development at risk along with any access roads. Development sites LP0177, LP0026, LP0952, LP1625 are critically important in alleviating any further flooding issues by soaking and storing surface water run off from the large amount of natural springs in the area. The Army was even called into Calderdale, in a bid to help protect people and property from yet another severe flood, also in February 2020. The way in which the Calder Valley routinely experiences flooding can be best understood by Tim Swift's, Calderdale Council Leader, words when he urged the government to grant Calderdale urgent assistance. Swift would like to see Calderdale recognised as a 'Tier 1' authority, which would entitle Calderdale to extra funding support, as 'Calderdale is one of a small number of areas in the country at "sustained risk" of flooding.' The head of our council has even recognised the significant threat we face in this area. The topographical context of the proposal in Greetland lends itself to increased flood risks, due to the abundance of natural springs, the

water course, and the steep valley sides. All of the factors that contribute towards flooding are against us. Flooding in this part of Greetland is a certainty that grows year on year with the ever-increasing threat of Climate Change. The way in which this valley, with its steep sides, floods is a natural hazard. Residents on Woodfield Drive had to take action to prevent their homes from flooding in February 2020, and not for the first time either. We have photographic evidence of how this is a routine battle that residents face, and not enough is being done to help prevent this from happening in the future. To build on this land would be to sign residents and the community to an unbearable, unavoidable fate. 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Disproportionate The most recent revisions to the Local Plan in response to the Inspector's letter include the addition of more Green Belt sites (including LP0026, LP0177, LP0952, LP1625) for release, which represents further unsustainable development as a disproportionate amount of the new homes proposed are across just four sites in Greetland. Indeed, 1,041 additional units of the 1,708 on these new housing sites (over 60%) are proposed in the Elland area alone. There has been substantial development of land in both Greetland and Elland in recent years. This cumulative development means that the land on Saddleworth Road is the only remaining parcel of the original Green Belt still in agricultural use. Development of the site would erode the visitor's understanding of the extent of the original manorial lands that Greetland covers. Unsustainable Development The Council's Sustainability Appraisal process to support the release of the site is inadequate. 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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 growth in the next 15 years. This is extremely optimistic given that the current UNEMPLOYMENT rate in Yorkshire is 4.3% which is the second highest of any region in the UK and is currently increasing. If Calderdale's economic growth was more accurate, there would be no need to destroy precious Greenbelt land. The Council have proposed a number of alterations to its Green Belt boundaries to simply meet an inflated housing target at the cost of great environmental harm. The NPPF is clear that Green Belt should only be altered in exceptional circumstances through the preparation or review of a Local Plan. Where it is necessary to consider revision of the Green Belt, this review should be robust in its justification for any alteration ; which is critically missing. The critical importance of early and meaningful engagement and collaboration with communities in producing Local Plans, particularly where this involves altering Green Belt boundaries has not been undertaken as the site has been parachuted into the plan-making process during hearing sessions. This constitutes a serious breach of procedural compliance. A local pressure group has been set up at the last moment to attempt to deal with these issues locally and has attracted a significant amount of support. However, the community has not been given the opportunity to produce a Neighbourhood Plan. Neighbourhood Plans can be used by local people to positively shape development in their area, including establishing principles for how former Green Belt sites are developed. Summary All of the reasons why these sites were not brought forward at the Publication Draft stage remain just as relevant now. There has been no further assessment of any of the significant constraints which resulted in the sites being filtered at that stage. The only reason for bringing them forward for allocation now is based on a simple exercise of responding to a requirement to increase the housing supply. There is no justification for allocating these sites given the flood zone allocation and evidence of flooding and given the fundamental conflict with the Green Belt Review in 2017. No consideration has been given to the potential to bring forward other sites in the area that do not carry these fundamental problems. No consideration has been given either to the lack of infrastructure available in Greetland to accommodate such a significant level of new housing. The function of the planning system is to facilitate sustainable development that makes a positive contribution to the environment. It is not the role of the Council to recklessly release demonstrably unacceptable sites within the Green Belt to meet a housing target. The Inspector's letter of 16 July 2019 to the Council notes (Para. 14) that "Local Plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits". This is the undoubtedly the case here. No sensible phasing options are proposed related to release of the most sensitive Green Belt sites upon the requirement to demonstrate a five-year housing land supply even if the release could be justified. It is illogical to allocate Green Belt sites in Flood Risk Zones 2 and 3 for development before brownfield sites are fully exhausted. The immediate release of the site for development is simply not a sensitive approach to the release of Green Belt land even if it were to be appropriate. Later, the Inspector asked the Council to review the option of 'the supply of more suitable and available sites elsewhere' understanding this to be an option, however, the further work on the additional sites considered (incorrectly by the Council) to be 'suitable and available' are not, in fact, suitable and, in any case, it has been revealed that this option on all sites on Saddleworth Road, Greetland (identified below) is simply not sustainable and the proposal is unsound. LP0026 - The Gate Farm, Saddleworth Road, Greetland, Elland, HX48NW LP0177 - Land adjacent Ellistones Place, Saddleworth Road, Greetland, Elland, HX4 8NW LP0952 - Land at New Gate Farm, Saddleworth Road, Greetland, Elland LP1625 - Land to the west of, Silverdale Terrace, Greetland, Elland, HX4 8NQ

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Remove the Green Belt land on Saddleworth Road from the Local Plan; LP0026 - The Gate Farm, Saddleworth Road, Greetland, Elland, HX48NW LP0177 - Land adjacent Ellistones Place, Saddleworth Road, Greetland, Elland, HX4 8NW LP0952 - Land at New Gate Farm, Saddleworth Road, Greetland, Elland LP1625 - Land to the west of, Silverdale Terrace, Greetland, Elland, HX4 8NQ

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5610765>

Comment ID **HRU1810**

Site ref (if applicable):

Person ID: **1243413**

Name: **Mrs Debbie Grundy**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

I write to strongly object to the above proposed housing development which is ill considered on the following grounds:-

- 1. Flood Plain** This development includes building on a known flood plain. Recent weather events resulting in the flooding of adjacent fields have demonstrated that the land is not suitable for housing development. Flooding in the UK is likely to become more common due to the effects of climate change. Building on areas prone to flooding has led to the devastating floods that have engulfed and continue to engulf towns such as Sowerby Bridge, Hebden Bridge and Mytholmroyd. Where there is a significant loss of trees and grass as would be the case in this development the ground is unable to hold and absorb water and will therefore flood. This is not an acceptable risk for our community.
- 2. Infrastructure** The additional road traffic resulting from this proposed development will mean unsafe road conditions with traffic unable to move freely. West Vale is a huge issue in terms of traffic congestion currently and the road system is not fit for purpose. A development of this size would make journeys for local residents and other motorists using the roads intolerable. The impact of this amount of housing on our local services such as schools and doctors surgeries has not been taken into account nor has the resulting pollution that this would create.
- 3. Environmental disturbance** There will be a huge impact on the landscape with damage to the natural habitats of wildlife and resulting loss of biodiversity in the area. The cumulative effects of the above will have a significant negative impact on the local area and overload local services and amenities. This is a green belt area. The local community will be deprived of green space which is used for families as recreation and is widely recognised as necessary for health and well being.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1815**

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:

LP0952 Land at New Gate Farm Sustainable Development The function of the planning system is to facilitate sustainable development. I am not opposed to the building of houses but support the building of the right type of homes in the right places. I am not convinced that other sites (brown-field and in-filling of existing urban areas) throughout Calderdale have been fully utilised. Over 600 new homes in a village of this size is disproportionate and would significantly alter the existing cohesive community. Green Belt The use of Green Belt land would have an adverse impact on this area which SIGNIFICANTLY outweighs the benefits. Apart from the obvious environmental benefits, this green land provides a definite boundary between this semi-rural community and others ; it prevents URBAN SPRAWL. Future economic growth has not been calculated since 2016 ; it should now be reassessed in light of Brexit. We may not need this vast number of houses in this area ; how sad it would be to obliterate this lovely green space for ever on a false premise. EXCEPTIONAL CIRCUMSTANCES have not been fully evidenced or justified for the decimation of this stretch of Green Belt land. Flooding The land in this part of Greetland provides an area for the rainfall to soak away as it cascades down the hillside. There are numerous underground springs and streams higher up, the water from which has to flow somewhere. Where these complex water systems have been disrupted by other (much smaller) building projects, the knock-on effect lower down has been unpredictable. Householders have found springs appearing in their gardens or streams flowing through their cellars. If the water were not allowed to soak into this land, the effect, further down Black Brook towards West Vale and Elland would be devastating. The recent flooding further up the Calder Valley demonstrates the folly of even considering this site for building homes. Traffic As Greetland is a semi-rural community, public transport is not frequent so most people rely on their cars. If over 600 houses are built in total, that would mean a potential 1200 extra cars on Saddleworth Road. The roads, particularly the two junctions at West Vale (which cannot be avoided) are unable to cope with the present volume of traffic at either end of the working day. There is no space to alter these junctions in any way so extra traffic would cause massive congestion. Air Pollution Extra traffic along Saddleworth Road will cause a huge increase in air pollution. As the vehicles pass close to Sunnybank Pre-School and KS1 of Greetland Academy, this toxic air will be taken into vulnerable developing lungs, probably causing life-long health problems for the children in our community. Infrastructure The infrastructure of the area cannot support 319 more families, let alone 600 if the whole of the proposed development is approved. We do not have capacity in the

schools or the GP surgery. It is already impossible to register with an NHS dentist. Ecology Along this stretch of Green Belt land there is an abundance of wild life ; fish amphibians, birds and small mammals. Not only will the air pollution affect them, but noise, human presence and light pollution. Added to this, the physical disturbance during the building phase ; this could lead to the loss of many of these creatures from the area FOR EVER. As we know, any change to our ecology can lead to unforeseen consequences in years to come. Open Space Open space has many benefits to the community ; it is good for our mental and physical well being. The footpaths and narrow lanes in this area are well used by families, dog-walkers, bird watchers etc. Please do not deprive future generations of this wonderful resource. We do not want people in the future to look back and wonder ' WHY DID THEY SACRIFICE THIS GREEN BELT LAND BACK IN THE 2020's?

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 **HRU1821**

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 **HRU1831**

Site ref (if applicable):

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:

The building on this site will destroy the environment and cause additional flooding. It will destroy the environment for wild life ie bats, deer and hawks. It will increase greenhouse gases which will affect residents health. This will put pressure on the one doctors surgery in West Vale which has already 12,000 patients and it is very difficult to get appointments. There will be air issues as there will be at least 1 car per house built and the roads to the motorway will be clogged as people will travel to work in Leeds/Manchester. Additional spaces in schools will be required for the increase in children of school age. Parent with children now park near the school an hour earlier to make sure they get a space! Ridiculous

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 **HRU1838**

Site ref (if applicable): **LP0952**

Person ID: **1246133** Name: **A J Hoyle** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

The proposal to build 246 houses on this green belt site is disproportionate to the local area. The increased traffic from the development will place a large additional burden on the already completely over-congested West Vale traffic lights. The schools in the West Vale area are already fully subscribed and potentially cannot accommodate the proposed increase in population. There will be an increased pressure on the doctor's surgery. The natural habitat of many birds and small mammals will be disturbed and curtailed. There is flooding in the area of the Black Brook. A development of this size is a threat to the absorption of water into the land, potentially causing further flooding down towards West Vale, where

significant flooding already exists. I note that objections to the proposals must be listed individually. However, with the two proposed developments (LP0177 and LP0952) being adjacent to each other, I think that the proposals in terms of the number of dwellings, when added together, must be taken into consideration as a whole as they alone, without any of the other proposals for this area, amount to 446 houses, the impact on the area of which cannot be underestimated.

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	HRU1845	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 **HRU1849**

Site ref (if applicable): **LP0952**

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 catastrophic consequences to the area of Greetland and surrounding villages. Including the properties of current residents living close to Black Brook.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5634586> ; <http://calderdale-consult.objective.co.uk/file/5634587> ; <http://calderdale-consult.objective.co.uk/file/5634585> ; <http://calderdale-consult.objective.co.uk/file/5634584>

Comment ID **HRU1852**

Site ref (if applicable): **LP0952**

Person ID: **1246060**

Name: **Ms Jacqueline Peter**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Objection. Air pollution from the massive increase of traffic from this new development if it goes ahead and with it congestion in an already congested 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 **HRU1856**

Site ref (if applicable): **LP0952**

Person ID: **959343**

Name: **Mr David Best**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

I am writing to object to the proposed development on the above site. The development of this site together with the planned development of sites LP0026, LP0177 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 **HRU1862**

Site ref (if applicable): **LP0952**

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 daily life. It is essential this is not taken away from residents including children to enjoy. This is a rural area and must remain so. There is no excuse for building on Greenbelt land. Does the Council realise this is a wildlife corridor? Not just birds (which includes owls, kestrels and woodpeckers) there are deer, newts, bats, foxes, badgers, hares and all manner of animals live and roam here free in the knowledge they are safe, unharmed and treasured by locals. Their habitat cannot be destroyed and they cannot be safely moved without causing undue stress, anxiety and untold damage even death to these animals. They must also come before any development. All these sites are natural flood plains and do their job well of diverting water away from houses. This is Mother Nature's work and nothing man made can compete with this so it is essential these sites are left as they are. Where would the developer divert the water to? They would just divert it to cause devastation to other Greetland, West Vale, Elland and even Brighouse residents and businesses. Current residents and businesses must come first! Has the Council seen the videos and photos of all the flooding in these Greenbelt areas? These show just how unsuitable this land is and should be removed immediately. The solution is to identify suitable brownfield sites and also to include Barkisland, Stainland and Norland in the spread of the 600 houses, as that number is disproportionate to the number

of houses currently in Greetland. Greetland residents will not take this lying down and Calderdale need to put their existing residents and wildlife first before any new development.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1871**

Site ref (if applicable): **LP0952**

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 **HRU1875**

Site ref (if applicable): **LP0952**

Person ID: **1243588**

Name: **Mrs Kathryn Walsh**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

Site no.LP0952 New Gate Farm 1.Air/noise pollution from increased traffic ,likely 2 cars per household.Proven that traffic fumes contribute to respiratory conditions. A probable 492 extra cars will severely impact on congestion of traffic in West Vale particularly at peak times.Junction of Stainland/Saddleworth road will need major alterations 2.Infrastructure-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 **HRU188**

Site ref (if applicable): **LP0952**

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:

Bceause th Proposal does not meet the Government's 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 given above.

Suggested Modifications:

Retain the Green Belt land and use brownfield sites

Comments:

Additional Evidence Link:

Comment ID **HRU1882**

Site ref (if applicable): **LP0952**

Person ID: **1246356**

Name: **Peter O'Kane**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

I feel Calderdale Council has failed in its duty to inform residents of these plans and therefore given them little time to object.

Do you consider the plan to be Sound?: **No**

Sound Reason:

I strongly object to any development on the above site. Greenbelt NPPF paragraph 143 states: - "inappropriate development is harmful to Greenbelt and should not be approved except in very special circumstances" I have seen no evidence from Calderdale Council to justify -"special circumstances" This area is a significant area for wildlife ; bats, owls, badgers, foxes, herons, etc. If we lose this area of Greenbelt land we lose the wildlife forever. Open green spaces are important for the physical and mental well being for all. Flooding As a resident of Saddleworth Road, I am well aware of the flooding which occurred in December 2015 and again in February 2020 and the devastation it caused local residents and businesses in the area. There are numerous natural springs in the hillside from Stainland, Barkisland and Greetland which run through this land. Should the land be developed where will this water go? It will move further down the valley causing flooding to other areas. The land is a natural flood plain and as such it should be left to do its job. Congestion The junction of Saddleworth Road/Stainland Road and Rochdale Road/Stainland Road is already significantly congested. Increasing housing will just exacerbate the ongoing problems with traffic congestion and pollution. Infrastructure Local schools are already full to capacity. The

local GP surgery would not cope with the extra patients. Urban Sprawl There is a risk that urban sprawl will further encroach into the surrounding countryside. This land in Greetland falls within the wider area of Elland and there is a disproportionate allocation to Greetland than other parts of the Elland region. Stainland having no housing allocation at all.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1883**

Site ref (if applicable): **LP0952**

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 **HRU189**

Site ref (if applicable): **LP0952**

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:

The proposal does not meet the Government's 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 given above

Suggested Modifications:

Do not build on Green Belt Land--use brownfield sites.

Comments:

Additional Evidence Link:

Comment ID **HRU1894**

Site ref (if applicable): **LP0952**

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 **HRU1901**

Site ref (if applicable): **LP0952**

Person ID: **1129569**

Name: **Mrs Angeline Nicholson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Our main objections are due to the following: Flooding ; High Risk We can remember the severe flooding in the area of Ellistones Place and Woodfield Drive, Saddleworth Road, Greetland. We are extremely concerned that this will happen again, which it did on Sunday 9 th February 2020. Any proposed housing development in this area is a significant concern and is classed as a high-risk flood area. I have attached the evidence to support this. The proposed site DOES NOT meet national policy in regards to flooding. Lack of Infrastructure We are very concerned about the impact of any proposed housing development will have on Saddleworth Road and the volume of traffic. Traffic does build up each day in particular at West Vale lights. Traffic comes from the Greetland residents and also Barkisland, Ripponden, Norland, stainland. The volume of traffic is already at its peak taking us 10-15mins at peak times to get out of west vale to travel to work. Any proposed housing development would have a significant effect with the increase of the number or cars on the road in Greetland (e.g. 600 houses, most people nowadays have up to two cars per household). This is a grave concern for us and not only having a massive impact on air pollution and air quality in this area. Having young children this is a massive worry for us. We don't want more pollution ; if anything we want less pollution. We also concerned about the impact the development would have on Greetland Academy ; which is currently at full capacity. Residents ideally want their children to go to their local school ; its going to make less places available and this will have an impact whereby parents will have to drive further to different schools, hence again more air pollution. The local GP Surgery will not be able to sustain its service with an increased number of residents coming into the area. There is also currently a national shortage of GPs and Nurses across the country. The GP Surgery would have to review whether they could register the large volume of new patients to the area. The proposed development would also impact the local Dentist and whether they could accommodate new patients. Wildlife Corridor The proposed site will have a massive impact on the wildlife in the local area. There are sited owls, squirrels, bats, foxes, insects and birds in this area. This would go against your Environmental Plan in terms of protecting Green Belt and allowing wildlife to flourish and continue. Greenbelt Land According to Paragraph 80 of the NPPF Green Belt serves 5 purposes: To check the unrestricted sprawl of large built up areas. To prevent neighbouring towns merging into one another. To assist in safeguarding the countryside from encroachment. To preserve the setting and special character of historic towns To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The proposed development would contravene against the 5 Green Belt functions. This is very concerning and should be brought to your attention. Of the 17 Sustainability Assessments this allocation has 11 uncertain assessments and 4 negative assessments. This site was refused planning permission also in July 2019. We completely OBJECT to the proposed development and all the other LP's listed on Calderdale consultation portal such as:

LP0177 Ellistones Place, Saddlworth Road LP0026 The Gate Farm, Saddleworth Road LP 1625 Land to west of Silverdale Terrace Primarily for the same reasons and concerns as outlined in this letter. We would be grateful if you could reply to our concerns and it will interesting to know how many objections have been made recently from the residents of Greetland!

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1908**

Site ref (if applicable):

Person ID: **1242976**

Name: **Mrs Lesley Pollacco**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

I am writing to object to the proposed plans for all of the above sites based on the following: - Objective 2 - TO IMPROVE SAFETY AND SECURITY FOR PEOPLE AND PROPERTY - This development will not improve this SA as there is no local police station or fire station as these have recently closed down. Increased traffic will increase the risk of RTAs. Property will be negatively effected due to the very high risk of flooding due to building on a Flood Plain. Objective 3 TO CREATE AND RETAIN HEALTHY VIBRANT AND INCLUSIVE COMMUNITIES. Increased traffic and traffic jams along Saddleworth Rd from West Vale up to and past Sunnybank Primary School at peak times (at the start and end of the school day) will have a negative effect on air quality and a likely increased rise in breathing related illnesses. Both local GP surgery's are oversubscribed. Journey time to the town centre at peak times is already around 30-40 minutes. This development will only increase these times. Local primary and secondary schools are already full and 600 houses could result in an extra 40 pupils per year group, therefore pupils will have to travel outside of the area for their educational needs leading to a divisive community and further impacting on road travel. Objective 4 TO 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 5 TO 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 7 TO 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 8 TO 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 9 TO 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 10 TO 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 11 TO 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 **HRU1914**

Site ref (if applicable):

Person ID: **956078**

Name: **Mrs Pauline Hill**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

As a resident of Greetland for the past 69 years I am mortified at the prospect of the proposed drastic changes to the previously agreed Calderdale Local Plan for the following reasons. Green Belt Our Green Belt in Greetland is at the heart of the community and there is not much of it left. If these spaces are taken then they are gone forever. The government attaches great importance to Green Belts and stipulates the Green Belt should only be built on in exceptional circumstances . (Refer to Section 13 of the NPPF .) We have sufficient brownfield sites within Greetland providing they are used to accommodate the needs of our local community and to support our local economy and would ask that all 4 of the sites on the Green Belt be removed. How will the council replace our green spaces? I also object to the planning application 18/01189/FUL as this particular site would meet the needs of our local people subject to revised plans. Flooding Flooding is a major problem all along the Green Belt along side Black Brook. The fields were extensively flooded during the storms 8th/9th February 2020 yet again with flood water spilling over into the gardens and almost into the houses of Woodfield Drive. The water was too deep to even walk in and

the river bank was totally cut off. The water was rushing into these fields at a terrible and frightening pace and you could not even see the boundary walls. To think that houses could be build on this land is completely outrageous (LP0177). This land has flooded all my life as my parents used to take us down to look when we were children. Do we not have enough flooding, Calderdale have declared a climate emergency? Flooding is extreme and frequent. Wildlife Any development would decimate this Wildlife corridor. There is an abundance of wildlife, herons, owls, many different species of birds, pheasants, bats, frogs, ducks and many more. This is a very valuable part of our environment. There would be an increase in the air pollution, noise, vibration and of course human presence. This Green Belt with all the nature and wildlife should be protected. We need these green spaces for our health they are well used. The wildlife corridor could not survive a major development and is also a flood plain. Traffic and Air Pollution The traffic on Saddleworth Road is becoming almost unbearable especially at peak times. I have lived on Saddleworth road for 67 years and cannot hardly get out of my driveway onto Saddleworth Road due to the amount of traffic. This is only a B road. There is also an increased amount of parked cars on the roadside which makes it even more difficult to navigate. Traffic also comes down from Barkisland and Ripponden. Should more houses be built there would be an increase of at least 1200 more cars as nearly every household has at least 2 cars if not 3 or 4. With the amount of traffic on this road I no longer feel safe walking to West Vale. Traffic is regularly at a standstill on Saddleworth road as the road cannot cope with the amount of traffic that use it. West Vale is consistently congested. We need the air quality in our area testing. We cannot support a huge rise in concentrated air pollution. We have to think of the health of the children and the wider community. Infrastructure Without major adjustments these plans would result in urban sprawl and would have a drastic impact on traffic, schools, GP and Dental Practices. Is it not the governments priority to improve air quality and retain open green spaces. This being essential for our health and wellbeing? If the houses are built on the brownfield sites then I do not object and accept that there may be a need for more housing. It has to be the right housing in the right places. Please make sure all the brownfield sites have been used before trying to take our Green Belt and Wildlife away from us. Attached are pictures from last weeks flooding. As I am writing this the fields are about to be flooded again.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5631975> ; <http://calderdale-consult.objective.co.uk/file/5631974>

Comment ID **HRU1922**

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 **HRU1927**

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 **HRU1945**

Site ref (if applicable): **LP0952**

Person ID: **1243847** Name: **Mr John GUY** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

We are writing to express our opposition to the above sites as listed on the Calderdale Council planning portal. We have attempted to register our opposition on the planning portal and have not received an 'activation code' which means we are unable to comment on the portal. Calderdale Council have not made all residents in the area aware of the need to submit new objections to the updated plan and that these must be submitted in good time. They have a responsibility to the residents and public in general to be open and transparent and this has not been the case, nor is the process to object easy or straight forward.

Do you consider the plan to be Sound?:

Sound Reason:

Ref: Objection to the following Sites: LP0026 LP0177 LP0952 LP1625 To whom it may concern, We therefore expect this letter / email to be classed as official comment on the above 4 sites. The reasons for our opposition are as follows: 1) Disproportionate amount of building in the Greetland area . The revisions to the plan (i.e. the addition of the new sites) proves further unsustainable development with a disproportionate amount of new homes proposed across four sites in Greetland, with 1,041 additional units of the 1,708 on new housing sites within Calderdale (over 60%) proposed in the 'Elland' area. The way in which Greetland has been bundled in with other wards creates a misleading representation of the

area. It is a village, not a town, why has it been included in Elland and why have other areas eg Stainland had zero land allocated? Ripponden and Rishworth are not included within Sowerby bridge or combined with a town, and therefore are represented in a fair way, which Greetland is not. Why is Greetland set out in such a way to disguise the how disproportionately the land in the local plan has been allocated? 2) Flood areas This affects the whole area. The proposed developments are situated within the flood plain of the Black Brook and are also subject to surface water flooding from the run-off from the steep hillside of the valley. This has been demonstrated very clearly at the beginning of February 2020 following Storm Ciara & storm Dennis. The Environment Secretary has stated that extreme rainfall events such as this will become more frequent as a consequence of climate change. Therefore, flood plains will become ever more important to -"slow the flow" and reduce the peak river levels further downstream. To build houses here is inappropriate both at a very local level and further afield. Development here on site LP 0177 will result in additional surface run off, which contributes to additional flooding. The fields currently act as a natural flood defense. If new development is related to causing flooding to existing properties, like the houses on Woodfield Drive, the development does not comply with NPPF policy. We need to question the Council's Sustainability Appraisal process to support the release of the new sites with the site at 'Land adjacent Ellistones Place' (Ref: LP0177). This appears to be a completely unjustified recommendation. The site report states that the assessment of SA7 is 'Negative' and marked 'RED' commenting that "Overall the impact is negative as the site is greenfield and lies within flood zones 2 and 3". Based on this information this site should be excluded, and Calderdale has declared a climate emergency. 3) Sustainable development & Infrastructure: The function of the planning system/process is to facilitate sustainable development that makes a positive contribution to the environment. It is not the role of the Council to release demonstrably unacceptable sites within the Green Belt to meet a housing target. The existing infrastructure is not adequate to support the development on this site or at others identified within the local plan. The chronic congestion already experienced in West Vale cannot be remedied and Calderdale Council have already admitted all they can do is change the traffic light sequence. This junction is already running at over 100% capacity. More bus stops and a train station proposed in Elland will not remedy this congestion as more proposed homes will mean more people commuting. Traffic from wider areas will have to come through West Vale to get to the new flyover proposed to join the A629 Elland by-pass to reach the station. Therefore the proposed 600 houses to be built on Saddleworth Rd will cause huge problems for not only residents of Greetland but also surrounding areas. It has been reported by WSP Parsons Brinkhoff Report on Transport Network that the traffic congestion at the junction of Stainland Rd/Saddleworth Rd would increase by approx 105% and that the junction of Stainland Rd/Rochdale Rd would increase by 100%. As West Vales lies at water level this congestion will increase air pollution to health damaging levels and taking into consideration there is a school only a little way up from the junction in West Vale on Saddleworth Rd, the impact to their health will be catastrophic as the school is very near the road. It must also be taken into consideration that majority of the roads in the ward are very narrow. Scar Bottom Lane and Brian Royd being case in point. Only very small buses can travel on these roads and they are limited as to how many people they can accommodate. Putting more buses on will just increase air pollution and congestion. There currently is no space at doctor and dental surgeries in the area. Similarly the additional housing proposed will be designed with families in mind, and there is insufficient capacity at local schools. There are extremely limited public transport services in the area. 4) Greenbelt land The greenbelt is highly sensitive, due to the wildlife corridor and the way in which it acts as a natural flood defense. The public right of way runs through this stretch of greenbelt and provides the local community free access for leisure and recreation. Why has this been left in the plan when Stainland, on high ground which does not have flooding issues has been saved from the local plan? The development here in Greetland will have much greater harm due to the flooding. A labyrinth of underground springs already cause small scale developments problems. The Greenbelt is protected land which is designed to prevent urban sprawl and towns merging into one entity. Greetland and Barkisland are villages if building on the Greenbelt takes place, then there will be no distinction between them. There is no valid reason to destroy this Greenbelt land when there are brownfield sites available in the area for development. There are many mature trees

on the site that need to be protected, as well as the visual amenity, these trees reduce pollution, stabilise the land reducing erosion caused by surface water at times of heavy rain. This area of greenbelt is home to numerous species of wildlife - deer, dippers, bats and countless species of insects. The wildlife & Countryside Act (as amended)1981, The Conservation (Natural Habitats &c) Regulations 1994 and the Countryside & Rights of Way (CROW) Act 2000 are all being contravened by including this site back into the Local Plan for development. Although the Calderdale Council's Senior Planning Officer recently stated at a Local Plan Meeting that they had saved much Greenbelt, the fact is they have proposed to build on even more Green Belt in Greetland than on the previous agreed Local Plan. Indeed the inclusion of sites in Greetland including site LP0026 is the majority of Greetland's existing Green Belt. Esther McVey, the current Housing Minister's written policy on Green Belt land states -"protecting the Green Belt goes beyond protection against development"and -"Greenfield sites should not be what we turn to, not what we look at first. Every blade of grass must be looked at before it is changed."In conclusion, all other issues which have been flagged and some highlighted by the council itself STILL remain.... Traffic impacts Air pollution Infrastructure Flooding They all just add to the fact that the proposed plan is not sustainable in NPPF terms. When the harm identified is taken into account then the proposed plans do not amount to sustainable terms. We look forward to hearing your response,

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1951**

Site ref (if applicable): **LP0952**

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 become more frequent as a consequence of climate change. Therefore flood plains will become ever more important to -“slow the flow” and reduce the peak river levels further downstream. To build houses here is inappropriate both at a very local level and further afield. Development here on site LP 0177 will result in additional surface run off, which contributes to additional flooding. The fields currently act as a natural flood defense. If new development is related to causing flooding to existing properties, like the houses on Woodfield Drive, the development does not comply with NPPF policy. We need to question the Council's Sustainability Appraisal process to support the release of the new sites with the site at 'Land adjacent Ellistones Place' (Ref: LP0177). This appears to be a completely unjustified recommendation. The site report states that the assessment of SA7 is 'Negative' and marked 'RED' commenting that "Overall the impact is negative as the site is greenfield and lies within flood zones 2 and 3". Based on this information this site should be excluded! Let's not forget Calderdale have declared climate emergency! 3) Sustainable development & Infrastructure: The function of the planning system/process is to facilitate sustainable development that makes a positive contribution to the environment. It is NOT the role of the Council to release demonstrably unacceptable sites within the Green Belt to meet a housing target. The Inspector's letter of 16 July 2019 to the Council notes (Para. 14) that "Local Plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits". This is exactly the case in here in Calderdale. Later, where the Inspector asked the Council to review the option of 'the supply of more suitable and available sites elsewhere', however, the further work on the additional sites considered (incorrectly by the Council) to be 'suitable and available' are not, in fact, suitable nor available, and in any case it has been revealed that this option is simply not sustainable. Why are local brownfield sites not being used as part of the plan. The existing infrastructure is not adequate to support the development on this site or at others identified within the local plan. The road network is already operating at capacity and frequently backs up at Saddleworth Road and Stainland Road at peak times, additional traffic from the development will only exacerbate this problem further. The queuing traffic will lead to increased levels of pollution, which is of particular concern at the Greetland school site which is situated at a lower level than the road. There currently is no space at doctor and dental surgeries in the area. Similarly the additional housing proposed will be designed with families in mind, and there is insufficient capacity at local schools. There are extremely limited public transport services in the area. 4) Greenbelt land The greenbelt is highly sensitive, due to the wildlife corridor and the way in which it acts as a natural flood defense. The public right of way runs through this stretch of greenbelt and provides the local community free access for leisure and

recreation. Why has this been left in the plan when Stainland, on high ground which does not have flooding issues has been saved from the local plan? The development here in Greetland will have much greater harm due to the flooding. A labyrinth of underground springs already cause small scale developments problems. The Greenbelt is protected land which is designed to prevent urban sprawl and towns merging into one entity. Greetland and Barkisland are villages if building on the Greenbelt takes place, then there will be no distinction between them. There is no valid reason to destroy this Greenbelt land when there are brownfield sites available in the area for development. There are many mature trees on the site that need to be protected, as well as the visual amenity, these trees reduce pollution, stabilise the land reducing erosion caused by surface water at times of heavy rain. This area of greenbelt is home to numerous species of wildlife - deer, dippers, bats and countless species of insects. The wildlife & Countryside Act (as amended)1981, The Conservation (Natural Habitats &c) Regulations 1994 and the Countryside & Rights of Way (CROW) Act 2000 are all being contravened by including this site back into the Local Plan for development. Although the Calderdale Council's Senior Planning Officer recently stated at a Local Plan Meeting that they had saved much Greenbelt, the fact is they have proposed to build on even more Green Belt in Greetland than on the previous agreed Local Plan. Indeed the inclusion of sites in Greetland including site LP0026 is the majority of Greetland's existing Green Belt. Esther McVey, the current Housing Minister's written policy on Green Belt land states -"protecting the Green Belt goes beyond protection against development"and -"Greenfield sites should not be what we turn to, not what we look at first. Every blade of grass must be looked at before it is changed."In conclusion, all other issues which have been flagged and some mitigated by the council itself STILL remain.... Traffic impacts Air pollution Infrastructure Flooding They all just add to the fact that the proposed plan is not sustainable in NPPF terms. When the harm identified is taken into account then the proposal do not amount to sustainable terms. I look forward to hearing your response,

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1956**

Site ref (if applicable): **LP0952**

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:

We are writing to express our opposition to the above sites as listed on the Calderdale Council planning portal. Calderdale Council have not made all residents in the area aware of the need to submit new objections to the updated plan and that these must be submitted in good time. They have a responsibility to the residents and public in general to be open and transparent and this has not been the case, nor is the process to object easy or straight forward. We therefore expect this letter / email to be classed as official comment on the above 4 sites. The reasons for our opposition are as follows: 1) Disproportionate amount of building in the Greetland area . The revisions to the plan (i.e. the addition of the new sites) is unsustainable development with a disproportionate amount of new homes proposed across four sites in Greetland, with 1,041 additional units of the 1,708 on new housing sites within Calderdale (over 60%) proposed in the 'Elland' area. The way in which Greetland has been bundled in with other wards creates a misleading representation of the area. It is a village, not a town, why has it been included in Elland and why have other areas eg Stainland had zero land allocated? Ripponden and Rishworth are not included within Sowerby bridge or combined with a town, and therefore are represented in a fair way, which Greetland is not. Why is Greetland set out in such a way? This does not show how disproportionately the land in the local plan has been allocated? 2) Flood areas This affects the whole area. The proposed developments are situated within the flood plain of the Black Brook and are also subject to surface water flooding from the run-off from the steep hillside of the valley. This has been demonstrated very clearly at the beginning of February 2020 following Storm Ciara & storm Dennis. The Environment Secretary has stated that extreme rainfall events such as this will become more frequent as a consequence of climate change. Therefore, flood plains will become ever more important to -"slow the flow" and reduce the peak river levels further downstream. To build houses here is inappropriate both at a very local level and further afield. Development here on site LP 0177 will result in additional surface run off, which contributes to additional flooding. The fields currently act as a natural flood defense. If new development is related to causing flooding to existing properties, like the houses on Woodfield Drive, the development does not comply with NPPF policy. We need to question the Council's Sustainability Appraisal process to support the release of the new sites with the site at 'Land adjacent Ellistones Place' (Ref: LP0177). This appears to be a completely unjustified recommendation. The site report states that the assessment of SA7 is 'Negative' and marked 'RED' commenting that "Overall the impact is negative as the site is greenfield and lies within flood zones 2 and 3". Based on this information this site should be excluded, and Calderdale has declared a climate emergency. 3) Sustainable development & Infrastructure: The function of the planning system/process is to facilitate sustainable development that makes a positive contribution to the environment. It is not the role of the Council to release demonstrably unacceptable sites within the Green Belt to meet a housing target. The existing infrastructure is not adequate to support the development on this site or at others identified within the local plan. The chronic congestion already experienced in West Vale cannot be remedied and Calderdale Council have already admitted all they can do is change the traffic light sequence. This junction is already running at over 100% capacity. More bus stops and a train station proposed in Elland will not remedy this congestion as more proposed homes will mean more people commuting. Traffic from wider areas will have to come through West Vale to get to the new flyover proposed to join the A629 Elland by-pass to reach the station. Therefore the proposed 600 houses to be built on Saddleworth Rd will cause huge problems for not only residents of Greetland but also surrounding areas. It has been reported by WSP Parsons Brinkhoff Report on Transport Network that the traffic congestion at the junction of Stainland Rd/Saddleworth Rd would increase by approx 105% and that the junction of Stainland Rd/Rochdale Rd would increase by 100%. As West Vales lies at water level this congestion will increase air pollution to health damaging levels and taking into consideration there is a school only a little way up from the junction in West Vale on Saddleworth Rd, the impact to their health will be catastrophic as the school is very near the road. It must also be taken into consideration that majority of the roads in the ward are very narrow. Scar Bottom Lane and Brian Royd being case in point. Only very small buses can travel on

these roads and they are limited as to how many people they can accommodate. Putting more buses on will just increase air pollution and congestion. There currently is no space at doctor and dental surgeries in the area. Similarly the additional housing proposed will be designed with families in mind, and there is insufficient capacity at local schools. There are extremely limited public transport services in the area. 4) Greenbelt land The greenbelt is highly sensitive, due to the wildlife corridor and the way in which it acts as a natural flood defense. The public right of way runs through this stretch of greenbelt and provides the local community free access for leisure and recreation. Why has this been left in the plan when Stainland, on high ground which does not have flooding issues has been saved from the local plan? The development here in Greetland will have much greater harm due to the flooding. A labyrinth of underground springs already cause small scale developments problems. The Greenbelt is protected land which is designed to prevent urban sprawl and towns merging into one entity. Greetland and Barkisland are villages if building on the Greenbelt takes place, then there will be no distinction between them. There is no valid reason to destroy this Greenbelt land when there are brownfield sites available in the area for development. There are many mature trees on the site that need to be protected, as well as the visual amenity, these trees reduce pollution, stabilise the land reducing erosion caused by surface water at times of heavy rain. This area of greenbelt is home to numerous species of wildlife - deer, dippers, bats and countless species of insects. The wildlife & Countryside Act (as amended)1981, The Conservation (Natural Habitats &c) Regulations 1994 and the Countryside & Rights of Way (CROW) Act 2000 are all being contravened by including this site back into the Local Plan for development. Although the Calderdale Council's Senior Planning Officer recently stated at a Local Plan Meeting that they had saved much Greenbelt, the fact is they have proposed to build on even more Green Belt in Greetland than on the previous agreed Local Plan. Indeed the inclusion of sites in Greetland including site LP0026 is the majority of Greetland's existing Green Belt. Esther McVey, the current Housing Minister's written policy on Green Belt land states -“protecting the Green Belt goes beyond protection against development”and -“Greenfield sites should not be what we turn to, not what we look at first. Every blade of grass must be looked at before it is changed.”In conclusion, all other issues which have been flagged and some highlighted by the council itself STILL remain.... Traffic impacts Air pollution Infrastructure Flooding They all just add to the fact that the proposed plan is not sustainable in NPPF terms. When the harm identified is taken into account then the proposed plans do not amount to sustainable terms. We look forward to hearing your response,

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU1962**

Site ref (if applicable):

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 **HRU1973**

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?: **No**

Sound Reason:

Keyland supports the allocation of their site at Saddleworth Road, Greetland (Ellistones Gate), but has concerns regarding elements of the site allocation policy wording. Keyland supports the proposed allocation of their site LP0952 Saddleworth Road, Greetland (known as Ellistones Gate) for housing development. Keyland has prepared a Delivery Framework which demonstrates that the site is available, suitable, achievable and therefore deliverable and viable. This includes Keyland's Six Capitals philosophy for delivery of the site. The Delivery Framework is attached to these representations for your information. Site Allocation Policy Keyland has concerns with certain aspects of the site allocation policy. The first bullet point suggests that the site's approach to drainage to be based on green roofs and wetland habitat. The site is not at risk from flooding as it is located in Flood Zone 1, Nevertheless, Keyland considers water as a

fundamentally important aspect of the Six Capitals approach to sustainable development. Keyland through this approach seek to ensure that all Development Plan Representation ; Calderdale Local Plan Housing Requirement, Update and Potential Supply Keyland Developments Ltd, January 2020 9 aspects of the green and blue infrastructure work together in harmony. Therefore, the approach to the drainage strategy needs to be flexible. The approach will include biodiversity and habitat enhancement, SuDs and open space, but it may not necessarily be along those areas prescribed in the policy allocation. This policy wording should therefore be amended. The second bullet point is also overly prescriptive specifying a distance for the buffer of 10- 20m. No evidence has been presented for this buffer area. The illustrative masterplan shows a green corridor in this area which retains and seeks to protect the Wildlife Habitat Network. However, specifying a distance for the buffer area without evidence is unjustified and should be removed. The third bullet point specifies the retention of trees and hedgerows. However, development platforms will need to be created. Hedgerows and trees will be retained where possible and if they are in good condition and further green infrastructure is to be incorporated into the site. However, it will be difficult to retain some of these in situ given how the land forms. The wording of this bullet point should be amended accordingly. Furthermore, the site already has a strong and defensible boundary with the Green Belt that fully accords with the Framework. Gates Head Lane is a distinct and permanent feature, which already contains houses and built form. Nevertheless, Keyland are incorporating significant landscaping and green infrastructure within the scheme and there will be soft landscaping along Gates Head Lane. A further boundary therefore does not need to be created. Keyland consider this site specific consideration should be removed. Delivery Framework Notwithstanding this concern, Keyland has demonstrated through the attached Delivery Framework that the site at Ellistones Gate provides a unique opportunity for the delivery of a diverse range of new homes developed within the context of Keyland's Six Capitals philosophy. The proposed scheme will deliver a Custom and Self Build area alongside SME and national house builders. This approach will diversify the housing market and accelerate delivery. The Six Capitals approach has therefore shaped the illustrative masterplan. As the starting point of the proposed scheme is different this leads to a different outcome. The development has been designed from the outset to meet the differing housing needs in the area. Furthermore, to meet the social, human and environmental ambitions a significant proportion of the site has been identified for a range of environmental, recreational and water management activities. The delivery of the Ellistones Gate scheme will therefore generate significant benefits for Calderdale and the wider region through the Six Capitals, environmental, sustainability and social agenda alongside the creation of direct and indirect job opportunities, alongside environmental and community benefits, stimulating the local economy, adding value and changing perceptions for the area. Keyland control the site at Ellistones Gate. This Delivery Report has shown that the site is -“available” and can be delivered in the short term in accordance with the Framework. It has been shown that the site is suitable for development. The site is in a sustainable area close to a range of services and facilities and public transport routes. This Delivery Report confirms there are exceptional circumstances supporting the release of the site from the Green Belt due to the urgent need to meet Calderdale's housing need and ambitions for growth. The site is therefore -“suitable” for a residential development in accordance with the Framework. The site has been reviewed against the Framework and criteria for allocating sites. It has been shown that there are no major constraints to the development of the site and that the site can be delivered in the Local Plan period. The site is therefore -“achievable” in accordance with the Framework. The technical reports undertaken have informed the indicative masterplan, which shows how a residential scheme which caters for a diverse range of new homes can be accommodated within the site, alongside connectivity, landscaping and drainage features. As such, the development of the site, as shown within the indicative masterplan, is considered to be achievable. The indicative masterplan has also been assessed through a high level appraisal and potential delivery programme, which demonstrates that the proposed scheme is viable and deliverable. It has therefore been shown that the site is available, suitable and achievable and therefore it is considered that the site is deliverable, in accordance with national planning policy and guidance. It is also attractive to the market, viable and is deliverable within the plan period.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

To overcome the objection and address soundness matters, the Council should: "£ Amend site allocation policy by amending the first bullet point as follows: o Provision of green and blue infrastructure on site such as SuDS, which also seeks to incorporate biodiversity and habitat enhancement and open space. "£ Remove the wording 10-20m buffer from the second bullet point. "£ Amend the third bullet point as follows: o Existing hedgerows should be retained and restored, where possible. "£ Delete the seventh bullet point

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5632461> ; <http://calderdale-consult.objective.co.uk/file/5632462>

Comment ID **HRU2002**

Site ref (if applicable): **LP0952**

Person ID: **1246546**

Name: **J Taylor**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

the Local Plan, I would like to object strongly against the development on the following grounds:- The great increase in traffic flow along Saddleworth Road with the consequent traffic at the West Vale traffic lights and the increased air pollution in the vicinity of the Greetland Academy School. As a retired professional biologist I am aware of the benefits to the local community and the above school, of the preservation of the wildlife along the Black Brook corridor. The increased pressure on local amenities such as school places and local doctor surgery availability would be total unviable. As a local resident in the adjacent area, living alongside Saddleworth Road for the past forty years, I am well aware of the seasonal flooding in the area of the proposed development. Evidence of serious flooding and the consequences, e.g the Calder Valley, indicate the dire result of possible flooding. I trust my objections to the proposed housing development will be viewed seriously and would welcome the opportunity to air my views personally with representatives supporting the development.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2007**

Site ref (if applicable): **LP0952**

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 further 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 **HRU2047**

Site ref (if applicable): **LP0952**

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 **HRU2055**

Site ref (if applicable): **LP0952**

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 **HRU2060**

Site ref (if applicable): **LP0952**

Person ID: **1246735**

Name: **Mark Mullany**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

The impact of the 4 Greetland housing sites on local infrastructure especially the road network, health services and schools will be huge. The road network which would serve these sites already suffers from severe congestion problems bringing economic, social/health and environmental impacts for everyone in the area. At the same time the Saddleworth Road corridor is particularly poorly served by public transport and any initiatives to improve services will be thwarted by intensified congestion resulting from development. Sites adjoining Black Brook are known to be subject to flood risk but the real extent of this risk is highly uncertain due to rapidly advancing climate change impacts which are also adding greater risk from smaller watercourses (also present on some of these sites) and general surface water run off. The sites as a whole provide valuable wildlife habitat in the Black Brook corridor extending into the fields beyond the wildlife network defined on the proposals map. At the same time they provide a valuable recreational resource for local people. However, there are concerns that what small areas of habitat are left after development will be under too much pressure both from construction and intensified recreational use.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2063**

Site ref (if applicable): **LP0952**

Person ID: **1246744**

Name: **Mr Steven Reed**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

I do not believe the plan to build on site LP0952 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 LP0952 should be removed from the Local Plan. The inclusion of this site suggests that the plan has not been properly prepared and is not in-line with national policy, and can therefore not be justified. 'Exceptional circumstances' to change the classification site LP0952, making it eligible for development do not exist, and the circumstances have not been satisfied. There is no evidence to suggest that thorough assessment, investigation or consultation to suitable brownfield sites has taken place. 'Lack of developer interest' has not been listed as valid reason that warrants the exclusion of a brownfield site from the Local Plan. The consultation has been lacking in clarity and honesty. Re-entering site LP0952 into the Local Plan without final scrutiny from Calderdale Councillors representing the Greetland and Stainland ward, and without pre-consultation engagement is not transparent. I also believe that labelling site LP0952 as being part of Elland is also very misleading, given that Elland is a completely separate conurbation with has separate identifiable amenities and postcode, and elected representatives. This demonstrates that the plan has not been positively prepared. Lack of adherence to national policy and legislation on flooding makes the plan unjustifiable, given that the development does not pass the 'exception test' (NPPF: 2019); the development is not only at risk of flooding, but without further assessment cannot be ruled out from putting other communities at risk of flooding in the future. No evidence exists to show to show that site LP0952 will not be needed to form part of future flood prevention or alleviation works. This demonstrates that the plan is not sustainable. Justification Financial forecasting used to determine the number of houses is not sound and should be revised. It has not been positively prepared, is not justified, and is not consistent with national policy: the additional number of houses added into the plan between October 2019 and January 2020 were added to due feedback from the inspector, it was not Calderdale Council's original desire to build so many houses, meaning the figure has been created to fit a target rather than to cater to an actual need. The financial forecast should now be reviewed in light of unplanned expenditure resulting from the February 2020 flood recovery project, and in turn reduce the number of houses required. Moreover, the economic forecast could not reliably forecast the impact of leaving the European Union as the date of leaving had not been determined when the forecast was made.

Do you consider the plan to be Sound?: **No**

Sound Reason:

I do not believe the plan to be sound, and reference: National Planning Policy Framework: 2019, paragraphs 133, 134, 155 - 165, 181 Government White Paper 'Fixing Our Broken Housing Market' WSP Parsons Brinckerhoff Report Calderdale's Vision 2024 Strategy Site LP0952 should be removed from the Local Plan for the following reasons: The inclusion of this site inclusion demonstrates that the plan has not been accurately prepared, cannot be justified, and is not consistent with national policy. I make these statements with reference to the National Planning Policy Framework: 2019: 'Exceptional circumstances' for development on LP0952 Local Plan have not been satisfied and a full examination of other sites has not

been presented. The possibility of building on Brownfield sites, or increasing the density of other suitable sites has not been thoroughly examined. Evidence of any thorough investigation of amending the boundary of the greenbelt has not been presented as part of this process. Development of site LP0952 would create urban sprawl, and the reduction of open space that this would lead to contravenes the established purpose of the greenbelt. For these reasons the plan is not sustainable. There is an existing need to reduce the chronic congestion in West Vale, and this proposed development would neither reduce traffic nor alleviate existing issues it raises. No evidence exists as to how the increase in traffic through West Vale's already very busy junctions would be managed, so the existing situation would be worsened rather than improved by the development. The forthcoming train station in the neighboring town of Elland would not reduce congestion in this area, but rather put more strain on the current road network due to increased traffic through the area, given that people would drive to the station and park their cars there, given that there are no other train stations in Calderdale's lower valley other than Brighouse, which is over three miles away. For these reasons the development is not sustainable. Declaration and the need to respond proactively to the Climate Emergency declared by Calderdale Council must override the need to develop site LP0952, due to the importance of the needs for clean air management and the creation of clean air zones. Increased emissions from the cars of people who will reside in the development proposed for this greenbelt site does not support the clear air management strategy. This further demonstrates that the plan is not sustainable. Classification of site LP0952 making it a Class 1 Flood Risk should be reviewed. There is no evidence to show that site LP0952 will not be needed in future flood prevention or alleviation schemes. The impact of climate change cannot be accurately assessed until thorough analysis on the impact of the February 2020 floods has taken place. No evidence has been presented to prove that the site can be safeguarded from flooding in the future nor that the development will not increase the risk of flooding in other communities along the River Calder. Without review of Calderdale's Flood Management Strategy, Calderdale Council cannot state that the plan is sustainable. Lower flood risk sites are available in neighbouring areas, and these , including brownfield sites unaffected by recent flooding, should be examined and considered for development ahead of site LP0952. There is no evidence to demonstrate that this investigation has taken place. The reasons cited above are a demonstration of why LP0952 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 **HRU2069**

Site ref (if applicable): **LP0952**

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 **HRU2077**

Site ref (if applicable): **LP0952**

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 **HRU2084**

Site ref (if applicable): **LP0952**

Person ID: **1243337**

Name: **Mrs Nicola Reed**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Do you consider the plan to be legally compliant for site LP0952? No - I do not believe the plan to be legally compliant for the following reasons: With reference to the National Planning Policy Framework: 2019 and the Government White Paper - "Fixing Our Broken Housing Market" I cite the following reasons as to why the Local Plan has not been positively prepared, cannot be justified, and is not consistent with national policy. With reference to paragraphs 133, 134, 155 - 165, 181 of the National Planning Policy Framework: 2019 and the WSP Parsons Brinckerhoff Report, I make the following points and provide reasons to why site LP0952 should be removed from the Local Plan: "Exceptional circumstances" to change the classification of LP0952, making it eligible for development to not exist, the circumstances have not been satisfied: Thorough scoping, investigation or consultation to identify brownfield sites has not taken place. - "Lack of developer interest" is not a valid reason exclusion of a brownfield site from the Local Plan. Lack of honesty, transparency and community consultation is shown by re-entering site LP0952 into the Local Plan. Final scrutiny from Ward Councillors has not occurred before wide publication. The site was not listed during pre-consultation engagement events. Communication has been unclear Site LP0952 is not part of Elland. Labelling the site as being part of Elland is misleading (Elland is separately identifiable with its own amenities and postcode). The principles set out in the Calderdale Statement of Community Involvements: 2015: 1.2" have not been adhered to as communication has not been clear or concise. Lack of adherence to current policy and legislation on flooding The development does not pass the - "exception test" meaning that the development could not only be at risk of flooding itself, but put other communities in danger of flooding. The landscape of Calderdale is so unique that further analysis of recent flooding must be completed before development work starts. No evidence to show that site LP0952 will not be needed to form part of future flood prevention or alleviation works.

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. I make these statements with reference to the National Planning Policy Framework: 2019: "Exceptional circumstances" for development on LP0952 Local Plan have not been satisfied. Fully examination of other sites has not been evidenced. Consideration of brownfield sites or increasing the density of other sites has not been thoroughly examined. Justification of changing the greenbelt boundary is lacking. Development of site LP0952 would create "urban sprawl". This goes against the importance of keeping open and accessible spaces. Current chronic congestion in West Vale would not be reduced. The development would lead to increased traffic in the area. This would put a strain on the existing road network. The plan is not sustainable - no examination of how the increase in traffic through the West Vale junctions would be managed. No evidence to show that the development would not have a negative impact upon other areas. The existing situation would be worsened rather than improved by the development. Elland train station would not reduce congestion in this area, rather put more strain in the current road network. The need to respond to the Climate Emergency in Calderdale overrides the need to develop site LP0952 due to the importance of clean air management and the creation of clean air zones. The development would lead to increased emissions. Existing chronic congestion in West Vale would be made worse by any development at site LP0952 - this further demonstrates that the plan is not sustainable. Classification of site LP0952 making it a Class 1 Flood Risk should be reviewed. There is no evidence to show that site LP0952 will not be needed in future flood prevention schemes. The impact of climate change and its relationship with the Borough is yet to be fully realised therefore forecasting the impact climate change will have cannot be done accurately at this point. There is no evidence to show that the site can be protected for its lifetime against flooding or the need to protect against flooding in other areas. The impact of flooding in February 2020 has yet to be fully assessed. The Strategic Flood Management Strategy should be reviewed and the Local Plan amended accordingly before site LP0952 be marked for development. Lower flood risk sites are available within Greetland and should be considered for development ahead of site LP0952. There is no evidence to demonstrate that this investigation has taken place. The development will not provide sustainable benefits to the immediate or wider area which outweigh risks posed to settlements along the River Calder. Financial forecasting used to determine the number of houses is not sound and should be revised. It has not been positively prepared, is not justified, and is not consistent with national policy: The additional number of houses added into the plan between October 2019 and January 2020 were added to due feedback from the inspector, it was not Calderdale Council's original desire to build so many houses, meaning the figure has been created to fit a target rather than an actual need. The financial forecast now be reviewed in light of unplanned expenditure resulting from the February 2020 flood recovery project, and in turn reduce the number of houses required. 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 LP0952 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 **HRU2089**

Site ref (if applicable): **LP0952**

Person ID: **1129718**

Name: **Mr Malcolm James**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

I wish to object to the proposed revised version of the Local Plan and these comments relate to the sites LP0952, LP1625, LP0177 and LP0026. I understand these have been added by the Council to meet a need presented by the inspector. In simple terms the economic objectives proposed by the Council were not supported by enough new housing in the area to support the increased population, which in part is thought would be attracted by the increased work opportunities. Thus it is a case of amending the economic profile or adding housing to meet an envisaged demand. The core of my objection to these additional sites is based on the numbers used in developing the original concept. There was a projection of a nett employment increase in the area of 8,295 jobs. The period concerned covers 2016 to 2032. Several elements of this figure seem to me to hold no logic at all. I will give several examples from the chart provided for the evaluation of the economic development. An estimated increase of 898 jobs in the combined retail and wholesale. Calderdale is not a location where large distribution facilities will be built. The geography and roads do not attract this activity which is evident by the almost total absence now of these companies. Retail in the towns of Calderdale are not likely to see any growth, holding the present job total would be considered a success. Health, not including care of the elderly, and residential care homes, shows an increase of 902 jobs. I am not certain of the present figure but I do know that about 4 years ago the local Hospital Trust were confident that they could reduce their non-medical staffing total by a rather similar figure based on new technology and greater efficiency of the analytical procedures of testing processes. This was never proved to be the case and thus the additional employment in this area is suspect particularly that the work was split between Calderdale and Huddersfield. Public services shows an expected increase of 3183 jobs. This I am sure will cover the range of such work as prevails in the public sector now. I find it difficult to believe that such a dramatic increase will occur in these years rather improbable. We have spent years reducing the staff and again increasing to this degree seems improbable. This is not a creditable figure for increased employment. I fear that in reality that if the land is given over to housing development the majority of the owners of the new properties will not be people employed in Calderdale but people working in particularly Leeds, Bradford or Manchester. The proximity of the M62 and the prospect of improved train services will be a great attraction for easy development opportunities, not only for those employed in Calderdale. Other considerations relate to the local environment; there is in addition no realistic possibility of improving the traffic flow or pollution on any of the immediate road networks. The roads are bounded on all sides by existing development and there is no point in spending millions on compulsory purchase to widen a road for a short distance merely to move the traffic jam a few hundred meters in either direction. I have chosen not to add to the comments about the green environmental damage or the flooding but fully support those who have. Development in this area would be a bad choice for reasons that hold no logic at all, other than meeting a numerical target, and I would request the proposal are rejected.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2097**

Site ref (if applicable): **LP0952**

Person ID: **960330**

Name: **Christopher & Brenda
Smith**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

Please, please, please can we save 'Our Greenbelt'. At this moment in time 'Greetland's Greenbelt'. We have lived in Greetland for 38 years, in the same house. A neighbour 38 years ago told us there were a lot of underwater streams in Greetland. Autumn/Winter 2019 saw gardens in our avenue flooded for the first time! We have had visits from the sewerage people, Calderdale Council and Yorkshire Water. Consequently four weeks ago two of our neighbours had their gardens dug up. Hopefully Calderdale Council will reimburse our neighbours to restore their gardens to pre-flooding condition. As it is more than likely that this flooding is a result of five houses being allowed to be built on Moorbottom Road! We like walking around Greetland's countryside and have noticed in the last two or three years how two wells have dried up. There was a spring down it's namesake Spring Lane, sadly it is no longer there. The stone trough exists but no water runs into it. Also the spring down Scar Bottom Lane has also dried up. Where is the water going? It has to go somewhere!!! I hope the Council will be held accountable for their decisions if the loss of this greenbelt goes ahead. The consequences of the loss of this greenbelt are ; more flooding, more traffic congestion, air pollution will rise. There will be a rise in noise and light pollution all leading to a rise in mental health issues which in turn all contribute towards 'climate catastrophe'!!!! There will be an increase in the demand on our local GP Surgery, the Dentists and Greetland's Primary School. The present infrastructure cannot cope with another 600 houses. Possibly another 600 children wanting to attend Greetland Primary School. I accept there is a need for more housing but before we dig up our beautiful countryside, our green fields which lie in the greenbelt, let's build on our brownfield sites, convert empty buildings into apartments and houses. Let's ensure all empty houses are occupied. I know of one detached family house in the Elland area which has been empty for years. Bought presumably as an investment! The houses proposed will not be for low income families, first time buyers or older people who want to downsize and which will free up family homes already in the Greetland area. They will be four and five bedroomed detached houses to accommodate people working in Leeds, Manchester.....to maximise profits for the developers. Building on greenfield sites is easier for the developers and again maximises profits! But once these green field sites are bulldozed then there is no going back. The 600 houses will produce an

extra 1,200 cars. There will be more air and noise pollution. There could potentially be 600 extra lawn mowers going in the summer months. The loss and damage to our wildlife, which is irreplaceable, their habitats gone forever. Light pollution. Dark skies are becoming fewer and further between. There is so much history connected to our skies. We need to conserve what we have. Building on our greenbelt will exacerbate 'mental health' issues. Open green spaces give people a sense of well being, happiness, contentment. Space to be able to 'stand and stare' and breathe in the natural air free from too much pollution. I quote a passage from the National Trust Magazine: 'We all want quiet. We all want beauty.... We all need space. Unless we have it, we cannot teach that sense of quiet in which whispers of better things come to us gently.' Octavia Hill 1883 Co-founder of the National Trust. She had a desire to protect the everyday beauty of places for everyone to enjoy, forever. We have such a place down Saddleworth Road and Brian Royd Lane. Not everyone can join the National Trust nor wish to get in their car and drive miles to walk in the open countryside. We have such a place on our doorstep. Where people can take fresh air with family and friends. Encourage children to be out in the open, exercising instead of inside and contributing to the obesity problem. Calderdale Council have the same opportunity, to stop our greenbelt fields being bulldozed, concrete foundations laid and six hundred houses built! Surely keeping our greenbelt is in line with the council's 'Wellbeing Strategy'. If the council are concerned about people enjoying good mental health, as Mr Butcher Calderdale's Director of Public Health says, I quote: 'A healthy and happy workplace is more than just an ideal ; it brings with it economic gains for businesses large and small too.' That's the message from Calderdale's Director of Public Health, Paul Butcher in his department's latest annual report. At a special presentation in which the importance of good mental health is discussed..... Good mental health is not just for the workplace but it is also very important in our homes and gardens and the area in which we live. Another 600 houses down Saddleworth Road will not help the mental wellbeing of the present residents but will exacerbate the problem! Mr Butcher also says 'If the local economy is to grow and flourish improvements to health and wellbeing must be prioritised! How true! Will Calderdale Councillors please consider their 'Wellbeing Strategy' for the people of Greetland. Because the proposed development of 600 houses along Saddleworth Road is not going to help our wellbeing. If it gets approved the development could take four or five years. There will be noise from the diggers as they excavate the beautiful green fields. Noise from the bulldozers, the wagons as they come and go from the site. The workforce - usually have radio's blaring music out. The dust, mud on the roads, more temporary traffic lights. The upheaval to all the wildlife that exists in the area. The loss of the wildlife habitats. We have the usual birds plus herons, grouse, owls, foxes and bats.. How does this help our mental wellbeing? We will need to join a business that is 'celebrating mental wellbeing' and trying to encourage more of it'. I worked for Calderdale Council for thirty years as a teacher. I would now like to retain my mental health wellbeing, by enjoying our greenbelt in Greetland and all that it offers. To continue to enjoy walking in our green countryside without hearing diggers, wagons, drilling, banging sawing, radios, seeing house after house being constructed to the number of 600. I would like to continue to hear the bird song. We heard an owl again last week! If the Leader of Calderdale Council, Councillor Tim Swift is 'committed to protecting Calderdale's green belt and wider countryside' will he please demonstrate it by taking off the greenbelt areas from the Local Plan. Let's build on brown field sites. Actions speak louder than words! We are trying to reduce our local carbon emissions. Councillor Tim Swift says I quote 'The Local Plan gives us the opportunity to manage this development to reduce the environmental impact and to protect the green spaces which are so vital for our communities and for future generations'. How true these words are! The Climate Change Working Party would like to update the Climate Change chapter of the Local Plan to include a commitment within Calderdale to reduce greenhouse gasses by 60% to 2032. How can this happen when there is a proposed development of 600 houses on Saddleworth Road? Is Greetland School going to be surrounded by 600 houses, which could equate to 1,200 extra cars going onto Saddleworth Road to access West Vale. All the fumes that this will add to the area. How healthy will that be for those parents who have chosen to walk their children to school? Rather than take the car and add to the already congested road! How healthy will it be for the many dog walkers, all the existing residents who already know the health benefits of walking and exercise in the fresh air is paramount to a healthy mental

wellbeing and how important it is for fitness. Greetland residents don't need to be encouraged to go out and 'move more'. 'Calderdale gets £2.65m boost to encourage more people to be active. Councillor Faisal Shoukat says: It's just about encouraging people to move more, more often, whether that's walking the dog, taking the kids to school.....' We already do it and that is why we care so much about our greenbelt we don't want it decimating! Although there again if our greenbelt does go we might need to get in our car and access other open spaces for our daily walk! Adding to the congestion and pollution of our local area! Councillor Faisal Shoukat says 'the Pathfinder grant cash will be used to test ways in which physical activity can be embedded across the borough.....using the borough's parks and open spaces.....' How ironic! We already have the green open spaces on our doorstep which we and visitors currently enjoy. Are we not doing enough destruction to our countryside? Please, Stop and Think! Because once those green fields have gone, they have gone!! There is no going back. Do we really want to destroy the beauty of the green fields, the wild life that inhabits the area. To discourage the walkers who are gaining fresh air, exercise and alleviating any mental health issues? Do we really want to spoil our countryside for the next generation? The children who are at Greetland school. The children who are not yet born and who will attend the school. Josh Fenton-Glynn in his 2019 manifesto prior to the General Election said 'he wanted to preserve the green belt for his 18 month old daughter to enjoy'. Well please Councillors Tim Swift, Faisal Shoukat and Josh Fenton-Glynn, 'actions speak louder than words'. We don't want empty promises. At the moment Councillors and Health Chief's are all very good at saying the right thing but please put it into action and let's stop the decimation of our greenbelt sites in Greetland and also the wider community of Calderdale. I am sure if we look hard enough we can find brownfield sites which are ripe for development, like the desolate site up Blackley which has now been developed and enhanced the area. But please let us not use greenbelt land. We are told the 'Environment Agency have not listened to the concerns raised by the people living in Mytholmroyd. Well will Calderdale Councillors please listen to the people of Calderdale. We do not want houses built on greenbelt land. Our fields in Greetland are flooded, you will have seen photographic evidence. The Black Brook is a torrent of water. Water runs down hill, it has to go somewhere, where will the water soak away if houses are built on these fields? The water will continue flowing into West Vale and onto Elland and create even more floods. Are Calderdale Council going to pay the insurance for all these flooded properties? Josh Fenton-Glynn says 'It's key to help those worst affected by these floods both financially and mentally, which is why we also have Healthy Minds on standby to help the public.' Well I and many others think that Calderdale Councillors can help the mental wellbeing of the people living in Greetland by saying NO to building on our GREENBELT LAND. We don't want empty promises and words, we would like our Councillors to say NO development on Greetland's greenbelt. Please let's 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 **HRU2111**

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 **HRU2121**

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 **HRU2128**

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 become more frequent as a consequence of climate change. Therefore flood plains will become ever more important to -“slow the flow” and reduce the peak river levels further downstream. To build houses here is inappropriate both at a very local level and further afield. Development here on site LP 0177 will result in additional surface run off, which contributes to additional flooding. The fields currently act as a natural flood defense. If new development is related to causing flooding to existing properties, like the houses on Woodfield Drive, the development does not comply with NPPF policy. We need to question the Council's Sustainability Appraisal process to support the release of the new sites with the site at 'Land adjacent Ellistones Place' (Ref: LP0177). This appears to be a completely unjustified recommendation. The site report states that the assessment of SA7 is 'Negative' and marked 'RED' commenting that "Overall the impact is negative as the site is greenfield and lies within flood zones 2 and 3". Based on this information this site should be excluded, and Calderdale has declared a climate emergency. 3) Sustainable development & Infrastructure: The function of the planning system/process is to facilitate sustainable development that makes a positive contribution to the environment. It is not the role of the Council to release demonstrably unacceptable sites within the Green Belt to meet a housing target. The existing infrastructure is not adequate to support the development on this site or at others identified within the local plan. The road network is already operating at capacity and frequently backs up at Saddleworth Road and Stainland Road at peak times, additional traffic from the development will only exacerbate this problem further. The queuing traffic will lead to increased levels of pollution, which is of particular concern at the Greetland school site which is situated at a lower level than the road. There currently is no space at doctor and dental surgeries in the area. Similarly the additional housing proposed will be designed with families in mind, and there is insufficient capacity at local schools. There are extremely limited public transport services in the area. 4) Greenbelt land The greenbelt is highly sensitive, due to the wildlife corridor and the way in which it acts as a natural flood defense. The public right of way runs through this stretch of greenbelt and provides the local community free access for leisure and recreation. Why has this been left in the plan when Stainland, on high ground which does not have flooding issues has been saved from the local plan? The development here in Greetland will have much greater harm due to the flooding. A labyrinth of underground springs already cause small scale developments problems. The Greenbelt is protected land which is designed to prevent urban sprawl and towns merging into one entity. Greetland and Barkisland are villages if building on the Greenbelt takes place, then there will be no distinction between them. There is no valid reason to destroy this Greenbelt land when there are brownfield sites available in the area for development. There are many mature trees

on the site that need to be protected, as well as the visual amenity, these trees reduce pollution, stabilise the land reducing erosion caused by surface water at times of heavy rain. This area of greenbelt is home to numerous species of wildlife - deer, dippers, bats and countless species of insects. The wildlife & Countryside Act (as amended)1981, The Conservation (Natural Habitats &c) Regulations 1994 and the Countryside & Rights of Way (CROW) Act 2000 are all being contravened by including this site back into the Local Plan for development. Although the Calderdale Council's Senior Planning Officer recently stated at a Local Plan Meeting that they had saved much Greenbelt, the fact is they have proposed to build on even more Green Belt in Greetland than on the previous agreed Local Plan. Indeed the inclusion of sites in Greetland including site LP0026 is the majority of Greetland's existing Green Belt. Esther McVey, the current Housing Minister's written policy on Green Belt land states -"protecting the Green Belt goes beyond protection against development"and -"Greenfield sites should not be what we turn to, not what we look at first. Every blade of grass must be looked at before it is changed."In conclusion, all other issues which have been flagged and some highlighted by the council itself STILL remain.... Traffic impacts Air pollution Infrastructure Flooding They all just add to the fact that the proposed plan is not sustainable in NPPF terms. When the harm identified is taken into account then the proposed plans do not amount to sustainable terms.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2132**

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 **HRU2136**

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 **HRU2140**

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 **HRU2143**

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 **HRU2147**

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 **HRU2152**

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 **HRU2156**

Site ref (if applicable):

Person ID: **1243962**

Name: **Mrs Anne Crawford**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

Air Quality- This is of great concern as we live adjacent to Saddleworth Road. We already think that the air quality is poor you can smell the fumes when we sit in our garden from all the lorries and cars that use this road. When we walk to the park in West Vale with our young grandson the fumes can be terrible and this isn't at peak times. When the motorway is closed the traffic backs up as far as Ellistones Place , this will only get worse. Recent articles by experts at children's hospitals have concluded that infants exposed to traffic flow have less grey matter in their brains and are more likely to develop asthma. More houses, means more cars which means more pollution especially to vulnerable children at schools on roadside sites in Greetland and West Vale. Building the quantity of homes proposed for Greetland will massively increase traffic, this isn't just the homeowners cars but delivery vehicles. It is the local government's duty to protect young and old alike from anything that may deliberately damage their health. The government is committed to reducing road pollution so this massive development should not go ahead. Noise Pollution- We already experience levels of noise pollution from the many lorries that speed down Saddleworth Road. We have speeding cars and taxis during the early hours of the morning especially Friday and Saturday nights and we are usually woken at 6am in the morning by traffic. If all these houses are built the traffic noise will be unbearable. This does not help our well being but causes depression. Loss of Wildlife- We are really concerned about the huge impact of this mass housing will have on local wildlife. The plan to build on so many fields at once is irresponsible, wildlife doesn't stand a chance. The local plan will destroy so many habitats this also has an impact on human welfare and the benefits of nature. Behind our house there used to be a small wilderness (it was green belt), the area was full of wildlife - bats, squirrels, foxes, mice, moles and many species of birds. Their whole habitat was destroyed for the sake of two big houses now concreted over. The impact on wildlife coming to our garden has been huge we hardly see anything now. Flooding - It hasn't stopped raining since September (climate change). Greetland is situated on a hillside and is full of springs. When it rains water is coming out of the ground everywhere, down ginnels, pouring out of people's driveways, coming through walls etc. In December 2015 Greetland was awash with water in particular the fields in LP0177 and again a couple of weeks ago when the proposed building site was a lake. In both these incidences West Vale was flooded damaging property. If this building work is allowed to take place then instead of the fields soaking up the water, the water will rush down the hills into West Vale flooding West Vale but it won't stop there this will lead to increased flooding in Elland and Brighouse. In light of the desperate situation in Hebden Bridge and Mythomroyd and the plea by flooded households and businesses to try to prevent this from reoccurring it seems irresponsible to create that

situation deliberately in this area. It was reported on the news this week that West Yorkshire has had the highest rainfall this winter than anywhere else in the U.K. Overdevelopment in one area - Greetland is being overdeveloped in comparison to other areas. We are expected to accept development on a life changing scale for people living in this area when other areas of Calderdale aren't seeing any development at all. The sites should be spread across Calderdale. In the past Greetland has seen many developments especially on Saddleworth Road. We don't have enough school places now nether mind when all these family homes are built, doctors and dentists are full. West Vale is a nightmare now, we have lived here 19 years and I don't remember having 1 year when Stainland Road didn't have roadworks. Loss of Greenbelt- what's the point in having areas designated as Greenbelt when it seems so easy to take it out. The idea of Greenbelt is to protect the countryside not to remove it, it should remain Greenbelt forever. In January 2021 the government is introducing a points based system for immigration. The figures for the amount of houses required was based on the free movement of the European Union these figures now need to be revised so therefore there should be a reduction in the amount of houses built. Please listen to the real concerns of people who live in Greetland. At the moment it is a pleasure to see the green fields to the south of Saddleworth Road please keep it that way.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2177**

Site ref (if applicable): **LP0952**

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 **HRU2178**

Site ref (if applicable): **LP0952**

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 development sites. Greetland is a beautiful semi rural village and the proposed extent of increasing the population density without any forward thinking regarding infrastructure would not be conducive to the 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 **HRU2201**

Site ref (if applicable):

Person ID: **1130552**

Name: **Mrs Nicola Beaumont**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Flooding You only need to look at the February 2020 floods to understand why building on this land is outrageous. Not for the first time, the river burst its banks along Saddleworth Road with flood water rising in the fields of the proposed development plots. Having previously lived on Saddleworth Road, I know for certain that this is not a one off. On many occasions, I would sit and watch as the river levels rose, and eventually fields (floodplains) becoming submerged in water. You can also look back at the floods of Boxing Day 2015. A memorable day when not only the river of Saddleworth Rd, but many parts of Calderdale (including Heath Rugby Club/Willow Valley Garden Centre), were unfortunate to be the victims of heavy rain and flooding. If these developments go ahead, where will the water go? The floodplains hold water in such a way that it creates a natural flood defence, storing water before it can take devastating effect elsewhere (people's homes and businesses). The Environmental Agency has as stated that this area of land is categorised as the most severe of all - Flood Zone 3 (land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%). Below are photos taken in the proposed Saddleworth Road sites following the February 2020 floods. Green Belt This land is classified as highly sensitive green belt on the Local Plan. It is a designated wildlife corridor and is home to a number of protected species such as bats, hedgehogs, barn owls, wood peckers, herons and birds of prey. A large scale housing development would result in non-physical disturbances to the wildlife and protected species in our area. Such disturbances are noise, vibration, visual presence, human presence, light pollution and air pollution. Government policy states that all brownfield sites must be used first. Brown field sites have not been exhausted. Air Pollution Developing 600 new houses along Saddleworth Road, we can estimate that this will bring approximately 2 vehicles per household, which equates to 1200 extra vehicles on the road in the local area. West Vale cannot cope with the vast amount of traffic congestion as it currently stands; increasing this will only have significantly negative effects on traffic levels and the levels of air pollution. Air pollution consequently affecting the health and wellbeing of people especially those in close proximity of the area. For example, the children at The Greetland Academy and Greetland Pre-School. Being located at the side of Saddleworth Road will not only make this a physically unsafe place to be, but the health of these children will be impacted by the inhalation of added traffic fumes. The World Health Organisation stated that one reason why children are particularly vulnerable to the effects of air pollution is that they breathe more rapidly than adults and so absorb more pollutants. They also live closer to the ground, where some pollutants reach peak concentrations; at a time when their brains and bodies are still developing. The Clean Air Strategy 2018 stated that - "While we do need to ensure economic growth, we also need to realise the 'cost of air pollution on health.'" https://consult.defra.gov.uk/environmental-quality/clean-air-strategy-consultation/user_uploads/clean-air-strategy-2018-consultation.pdf Community The proposed sites for development are used daily for walking and other forms of recreational activity such as biking and running. This green belt land is open space and a wildlife corridor, homing owls, bats, herons, hedgehogs but to name a few. The land is a quiet place, perfect for mental and physical health and wellbeing. Building on this land will be detrimental to the health and wellbeing of our people. Infrastructure The Greetland Academy already consists of 2 classes per year group, with approximately 30 children in each class. This school is already split over 2 sites, both full to capacity, so how can it possibly cope with accommodating more children? Developing on this land will provide no option to extend the Key Stage 1 Site, and the location of Key Stage 2 makes it impossible to accommodate increased intake of children. The Doctors Surgery would struggle to manage waiting times and appointments with an increase in patients and the local Dentist already have a waiting list for new patients. Junctions at West Vale unable to accommodate additional volume of traffic, as it is already dysfunctional. West Vale is a thoroughfare for a number of

locations including but not limited to: Halifax, Huddersfield and the M62. Commuters from various surrounding areas such as Ripponden, Barkisland, Elland and Stainland rely on the West Vale junctions to make journeys to these destinations. The increase in traffic congestion is too much for West Vale and surrounding roads to cope. Also, worth noting is, Rochdale Road which runs parallel to Saddleworth Road is also impacted by traffic congestion from Saddleworth Road, and again is not capable of supporting the increased number of vehicles on the road as a result of the housing developments.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5634811> ; <http://calderdale-consult.objective.co.uk/file/5634810> ; <http://calderdale-consult.objective.co.uk/file/5634812>

Comment ID **HRU2211**

Site ref (if applicable):

Person ID: **1246925** Name: **Mr George Hill** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

Green Belt Our Green Belt in Greetland is at the heart of the community and there is not much of it left. If these spaces are taken then they are gone forever. The government attaches great importance to Green Belts and stipulates the Green Belt should only be built on in exceptional circumstances. (Refer to Section 13 of the NPPF .) We have sufficient brownfield sites within Greetland providing they are used to accommodate the needs of our local community and to support our local economy and would ask that all 4 of the sites on the Green Belt be removed. How will the council replace our green spaces? I also object to the planning application 18/01189/FUL as this particular site would meet the needs of our local people subject to revised plans. Flooding Flooding is a major problem all along the Green Belt along side Black Brook. The fields were extensively flooded during the storms 8th/9th February 2020 yet again with flood water spilling over into the gardens and almost into the houses of Woodfield Drive. The water was too deep to even walk in and the river bank was totally cut off. The water was rushing into these fields at a terrible and frightening pace and you could not even see the boundary walls. To think that houses could be build on this land is completely outrageous (LP0177). Do we not have enough flooding, Calderdale have declared a climate emergency? Flooding is extreme and frequent. Wildlife Any development would decimate this Wildlife corridor. There is an abundance of wildlife, herons, owls, many different species of birds, pheasants, bats, frogs, ducks and many more. This is a very valuable part of our environment. There would be an increase in the air pollution, noise, vibration and of course human presence. This Green Belt

with all the nature and wildlife should be protected. We need these green spaces for our health they are well used. The wildlife corridor could not survive a major development and is also a flood plain. Traffic and Air Pollution Should more houses be built there would be an increase of at least 1200 more cars as nearly every household has at least 2 cars if not 3 or 4. With the amount of traffic on this road I no longer feel safe walking to West Vale. Traffic is regularly at a standstill on Saddleworth road as the road cannot cope with the amount of traffic that use it. West Vale is consistently congested. We need the air quality in our area testing. We cannot support a huge rise in concentrated air pollution. We have to think of the health of the children and the wider community. Infrastructure Without major adjustments these plans would result in urban sprawl and would have a drastic impact on traffic, schools, GP and Dental Practices. Is it not the governments priority to improve air quality and retain open green spaces. This being essential for our health and wellbeing? If the houses are built on the brownfield sites then I do not object and accept that there may be a need for more housing. It has to be the right housing in the right places.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2247**

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->

Comment ID **HRU2267**

Site ref (if applicable): **LP0952**

Person ID: **1246939**

Name: **Joseph Matthews**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

I would like to 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 **HRU2279**

Site ref (if applicable): **LP0952**

Person ID: **1246958**

Name: **Mr Ian Barker**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?:

Sound Reason:

THIS COMMENT WAS RECEIVED AFTER THE CLOSURE OF THE REPRESENTATION PERIOD. I would hereby like to register my formal OBJECTION to the planned building on the land adjacent to Saddleworth road Greetland, Application numbers: LP0177 ; LP0026 ; LP0952 ; LP1625 Reasons According to legislation when planning and developing an area, buildings should first and foremost be built on 'Brown Field' sites, and not Green Belt land. I am aware that there are still a number of Brown Field sites that have not been developed in the area. All four sites listed above are currently Green Belt Land. Three of the sites listed currently also form part of the flood plane around the Black Brook river which does actually flood every year now. This Green Belt area forms part of a Wild life corridor where the following can be seen: Herons, King Fishers, Owls and most importantly Bats as well as squirrels and lots of other bird life. Also I have seen first hand what can happen when a building development takes place along side what is a clean river. Building waste pollutants and other rubbish ended up in the river, and actually killed a lot of the fish. This area is also used on a daily basis by people who like to take in nature and enjoy the sound of the river and the bird song etc. One other area of concern is the fact that if planning permission goes ahead for up to 600 houses then on average most households now own 2 cars. This would mean up to 1200 more vehicles could be using Saddleworth road on a daily basis. With most of them having to pass the Junior and infant school which is situated to the south side of the road and has actually been built below the level of the road. This means that when the extra vehicles are queuing for the traffic lights as they pass the school the Children are going to be more vulnerable to the dangerous pollution from vehicle exhausts which does actually stay down closer to the ground at low level. The traffic flow through both sets of traffic lights in West Vale is already running at around 100% capacity during the morning and evening commute. With an estimated 1200 more vehicles using this route there is no way that these traffic lights will be able to manage without there being huge tailbacks and grid lock. Finally: I would once again like register my 'Objection' to the above mentioned planning permission being granted.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU2297**

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.o](http://calderdale-consult.objective.co.uk/file/5635660)

Comment ID **HRU2312**

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/5635676>

Comment ID **HRU2340**

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 **HRU289**

Site ref (if applicable): **LP0952**

Person ID: **1242021**

Name: **Mr Damien Margetson**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

I am not qualified to answer this question

Do you consider the plan to be Sound?: **No**

Sound Reason:

I have set out my comments on the following plans LP0026 (The Gate Farm), LP0177 (Land adjacent Ellistones Place), LP0952 (Land at New Gate Farm) and LP1625 (Land to the west of Silverdale Terrace). These observations are based on my personal reflections, having lived in the community for the past 4 years, against the objectives which are set out in National Planning Policy Framework dated February 2019

(-“the Framework”¹) 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”² I can't see how this objective is achieved with the current plans. 600 new homes requires the development and provision of significant changes to the infrastructure in the surrounding area BEFORE the homes are built. There is none in the current plans for this as far as I can determine. Local schools, doctors and dentists are currently oversubscribed and have no capacity to accommodate any more residents. Where will they go? The local bus service already does not meet the demands of the area, with the 503 services to Halifax and Huddersfield often being oversubscribed and delayed due to the existing traffic hold ups. Additionally this service running through West Vale is between 1-2 kilometres away from the majority of the proposed houses on these sites. The 343 service passing along Saddleworth Road is infrequent (only one bus per hour) with bus stops only on one side of the road - a safety risk for not only children and the elderly, but indeed for everybody, especially given the speed at which traffic enters the area and the heavy wagons using the road. The local traffic in West Vale and Greetland is already at a standstill in peak times and this is slowly getting worse at off peak times. There are currently proposed developments for improving the road network on A629 Huddersfield to Halifax corridor and on the A58 / A624 Halifax to Rochdale / M62 routes. This is great news for improving commuting along these routes, but it misses the point that Saddleworth Road is a direct connection between these schemes. Any improvement at the entry and exit to Saddleworth Road is pointless if the access between is congested and doesn't flow, as is the situation now in the bottleneck that is West Vale. The introduction of 600 houses along this route will only further add to this congestion and seriously undermine the economic benefit which is supposed to be generated from these Road Schemes and housing developments. Saddleworth Road itself is already an infrastructure disaster, especially in and around the areas of the proposed new developments. Throughout the whole 2019 there have been roadworks somewhere along this stretch of road. Invariably it is as a result of water rising to the surface, which I am told by the Individuals doing the repairs is due either to one of the numerous fresh water springs bursting through the surface material or the decay of the old pipework, which is being patched. It is not surprising the local road conditions are so poor (some of the worst I have seen in my travels across the country) given the volume of traffic which currently uses this road, especially from the HGVs which have to use the road to access the Sonoco recycling plant and the Bosch industrial units. Every journey requires me to wait for one of these HGVs to manoeuvre around the parked cars before any progress can be made. God knows what damage construction vehicles and a further 600+ cars will do to the road. The Council seemingly already doesn't have enough budget to repair the existing roads properly and sustainably - the situation is only going to get worse. I have noted that as part of this process Greetland has been classed as part of the Elland Township to justify the proportion of allocated land. I do not see how this can be so. Greetland is a separate village with its own characteristics, community, infrastructure and councillors. I have never considered myself to be living in Elland. We are clearly separated by Long Wall. If

Greetland is looked at as a separate locality, which I strongly believe it should, then the local plan allocates a disproportionately high number of new homes in this area as well as creating large scale urban sprawl which is contrary to para 80 of the Framework. Social ; health and fumes / pollution At para 170 the framework states ' Planning policies and decisions should contribute to and enhance the natural and local environment by: " | a) protecting and enhancing valued landscapes, sites of biodiversity or geological value' The Greenbelt areas under discussion sit within the heart of the Greetland community. Taken together, they form a large open space creating a wildlife corridor full of biodeiversity. If this proposed development were allowed to go ahead the landscape and natural habitats for these animals would be lost, causing distress and irreparable destruction. I regularly witness deer bounding through the fields under consideration. Where would these creatures go? It is not a sound argument to suggest that the wildlife corridor could be protected. Once their natural home is taken away, it is gone for good. The framework also states at para 170 e) that policies and decisions should contribute to and enhance the natural and local environment by ' preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution ' and ' Development should" | help to to improve local environmental conditions such as air and water quality' . I do not see how the building of 600 new homes, with the associated emissions from both heating and cars can possibly do anything but have a detrimental affect on the local air pollution. Saddleworth Road, the main road through these developments, is already a primary route for a large number of lorries a day from the Bosch factory, the Sonoco recycling plant. Add to that an additional 600 homes within a small area and the community is exposed to unacceptable levels of traffic and air pollution. Environmental: The framework documents states -“ The Government attaches great importance to Green Belts "¶it goes on to state -“Green Belt boundaries should only be altered where exceptional circumstances are fully evidence and justified"¶ At para 144 it further states -“ local planning authorities should ensure that substantial weight is given to any harm to the green belt"¶and at para 145 - “ a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt "¶I can't see how any of these statements can be met with the building of 600 new homes on an area of sensitive Green Belt. At para 155 the framework states: -“ Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere "¶The areas proposed for the new 600 homes is on Green Belt that naturally floods. In the 4 years I have been a resident of this community the area has been completed flooded twice. With the local area full of fresh water springs it is not uncommon to find the local drains and sewers unable to cope even after shortest of prolonged heavy bursts of rain, and it is only the presence of the Green Belt area which prevents homes flooding on a regular basis. The frequency of these heavy and prolonged rains is only set to increase with the global warming challenges we currently face. It therefore seems incongruous to add to this problem by building on the only area which nature has provided to counter the irreparable climate changes we are facing. In September 2019, The Housing Minister, Rt Hon Esther McVey announced that local authorities would be receiving money to crack down on illegal developments in Green Belt areas, stating that ' Once the Green Belt is built on its often gone for good, thats why we are determined to protect it. The public have told us loud and clear they want it kept for future generations to enjoy. ' I understand that Calderdale Council is set to receive Â£50,000 of this Planning Delivery Fund. How can it justifiably take this money in one hand to prevent inappropriate building on Green Belt Land, and in the other hand allow the large scale destruction of Green Belt Land in the Greetland area? This is the first time I have ever objected to a proposed development - I am doing so because I feel so strongly that we need to protect this area of natural Greenbelt. 20 years ago we were told that if we didn't make changes then climate change would ruin our planet - as human beings we largely chose to ignore those warnings. We are now starting to reap the consequences with increased temperature extremes, earthquakes, storms and flooding. My children continually tell me that our generation are ruining their future. They have a valid point. We need to stop the continual disregard for our environment, natural habitat and wildlife and instead seek alternatives. There are numerous

brownfield sites (as well as lower flood risk areas) that could be considered as development options to create new housing - some of these may be more expensive to develop, but developers profits should not be the overriding consideration in deciding where to build. Neither should political motive. On this basis, all 4 of the sites, LP0026 (The Gate Farm), LP0177 (Land adjacent Ellistones Place), LP0952 (Land at New Gate Farm) and LP1625 should be removed from the Local Plan

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

I am not qualified to answer this question

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU312**

Site ref (if applicable): **LP0952**

Person ID: **1242293**

Name: **Mr Andrew Beaumont**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Please refer to comments below

Do you consider the plan to be Sound?: **No**

Sound Reason:

For the attention of those responsible for Approving or Rejecting Local Development Proposals (Local Plan Team, Councillors, Local and National Planning Inspectors, Katie Child, Miny Schofield) Dear Sir, Letter of Objection to Proposed Housing Developments in Greetland - Site Ref LP0952. LP0177, LP1625 and LP0026 I have been a resident of Greetland all my life, some 63 years. Over that period I have witnessed the relentless creeping expansion, development and transformation of our once small desirable residential rural village into a fairly large residential conurbation of urban sprawl serving the commuter belts for the cities of Leeds and Manchester. Already gone, over my lifetime, are many of the green fields and areas where we played as children, in favour of large housing developments. However, these developments are modest in comparison with the proposed Housing Development Plan which some local and national politicians seem determined to drive through, no matter what the cost to our community, environment, air quality and wildlife. If this development comes to pass, the village of Greetland will balloon, in a very short space of time, by 30 - 40%. And, apparently, with no forward thinking about how this expansion can be serviced. The community already seems to be serviced to full capacity by roads, public transport, doctors, dentists and schools. Any future demands on these services would be unsustainable. Anybody living in the area, including the surrounding areas of Elland, Stainland, Norland, Barkisland and Rippenden, understands the nightmare of rush-hours in West Vale. For years, it has been a bottleneck for residents, using both public transport and private cars, as all routes lead to the traffic-light controlled junction of Saddleworth Road and Stainland Road, followed within 200 yards by the next traffic-light controlled junction of

Rochdale Road and Stainland Road. At each of these locations there is the added complication of two very busy, relatively new businesses (the Co-op and Springhead Funeral Services) - how, in heavens name, was permission ever granted for their main vehicle access points to be located immediately next to the traffic lights, creating a near certain recipe for both road traffic accidents and/or holding up the traffic? And obviously, as a result of the traffic congestion on Saddleworth Road, some residents of the Sunnybank, Daleside and Trenance Gardens areas, as well as some residents of the new homes, will divert their routes to use Rochdale Road which will simply distribute the congestion to the whole of Greetland. There is currently no way of avoiding West Vale and there is no way of expanding the road network to by-pass West Vale in the future. And then there is the very serious consequence of this massive increase in traffic - air pollution. The development is within a valley which will trap traffic exhaust fumes. Within this valley are two schools, Greetland School Sunnybank Annex and West Vale, where some of the most vulnerable people in our society, young children, will be subjected to high levels of toxic air pollution every day of the week. And what will be the impact of all this air pollution on the Council's health and anti-obesity campaign? The loss of this Green Belt will remove an extremely popular route for many people taking social exercise, not only to improve their physical health but also their mental health well-being. The alternative would be to walk along Saddleworth Road, breathing in the pollution, or driving further away to rural areas for cleaner fresh air. The area along the Black Brook is also a recognised Wildlife Corridor - sightings of bats, owls, herons, kingfishers, badgers and deer are commonplace. If this development gets the green light, the destruction and eradication of the existing flourishing ecosystem is guaranteed. In this age of Climate Change and Global Warming, we are constantly being reminded of the adverse effects on our environment. And the proposed development area is no stranger to regular and serious flooding (in 2015 we experienced some of the worst flooding in living memory). The fields around the Black Brook act as a natural flood plain, without which, more serious flooding of developed areas further downstream would be a certainty. Existing drains and sewers already appear to be working to full capacity so any significant increase in foul and surface water volumes would spell certain disaster at the point of discharge. Surface water attenuation systems can be designed and included within the engineered drainage proposals, but the very old existing infrastructure at the end of the line was not future-proof designed for the volume of water that would be generated by developments of this size. And would a development of this size, combined with all the other concurrent developments throughout Calderdale, necessitate the construction of additional sewage treatment works? We already have "the Smelly Mile" in our locality, Stainland Road from West Vale to the Calder and Hebble; additional sewage treatment will not do anything to improve the air quality here. I have recently read a document taken from the Council's Planning website, entitled "Local Plan Initial Draft 2017" in respect of Site LP0177. Never have I seen a report so heavily slanted in favour of it's paymaster, David Wilson Homes, and so obviously commissioned and prepared by a well practiced Specialist Planning Consultant, who probably lives many miles away and will, therefore, be unaffected by the consequences of this development, and who has spent only a couple of days surveying the area and really knows nothing about our community and it's way of life, and in order to satisfy the ulterior motives of some members of Calderdale Council to drive this development through whatever the cost. Some of the statements, comments and responses in each of the Site Assessment Categories are so theoretical and standard that they could have been taken from the manual "How to Get Your Development Through the Planning Hoops" and could have been prepared at a Consultants desk in the Outer Hebrides with the aid of Google Maps and aerial photographs. To prepare a report that truly reflects the conditions and consequences of such a major development, you need to live in the village, you need to use the services and facilities, and you need to know and understand the community, the habitat and the behaviour of the people and the wildlife that is home to all of us. So do I agree with the site assessment? ABSOLUTELY NOT! I have not used the on-line Planning Portal because it isn't easy to navigate and I felt it was easier for me to speak from the heart in a letter. But please ensure my letter of objection is added to the many other similar letters you may receive.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

See previous comments

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU317**

Site ref (if applicable): **LP952**

Person ID: **1128222**

Name: **Mrs Bennett**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

With specific regard to Community Involvement I do not believe that community involvement is in general accordance with the Calderdale Statement of Community Involvement 2015. Section 1.2 of the Calderdale SCI 2015 calls for Clarity. -“We need to be very clear about what we are asking people and we must be sure that people understand what will happen as a result of this engagement. This includes being clear about what decisions have been made, what have not, and who will make the final decision.” Until a recent local meeting on January 27th, and a local action Facebook group was set up, very few people in the Greetland Ward were aware of the Local Plan and proposed new allocations within the area. - It is unclear that site allocations submitted in the 2018 draft plan are still in the Local Plan and hence people do not have a clear picture of all the site allocations included. This makes a significant difference when looking at percentage growth of a community. - many people including myself are not clear on what we are being asked with questions such as 'is the plan legal'? 'Do you consider the plan complies with Duty to Co-operate?'. - With regards to LP26, LP177, LP952 and LP1625: Greetland, Sunnybank and West Vale Wards still remain part of Elland. This is misleading and means some residents would take a look at the initial directory of new site allocations, and failing to see Greetland on there, think that there is no inclusion in their area. I made this error in the 2017 submission process until corrected by a neighbour. - The SCI under section 1.3 states -“to keep the process simple” and -“to make it easy to get involved” Asking questions such as -“is the plan legal” is not simplistic as most people outside of a planning department would not know the answer to this question and would potentially be put off contributing. - I do not think it has been easy to get involved. Most people, in a room full of over 200 people at a recent local meeting, did not know where to find the local plan or how to go about commenting. This is also evident by the fact that Councillor Paul Bellenger has pushed the Head of Calderdale Planning for an email address, external to the online portal, to try and make it easier for people to comment. The council has provided a Sustainability Appraisal Report. However, under the chosen Option 4, of the 17 objectives analysed, 9 of them have been marked as -“uncertain” impact. I question how fully this report has been used as a 'tool for appraising policies to ensure they reflect social, environmental and economic factors' when the impact to the Greetland community at local site level of so many key outcomes are also uncertain including: accessibility to essential services, facilities and employment; to reduce the risk of flooding; to reduce the effect of traffic on the environment etc.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Justified - in choosing the sustainable option has the council considered the impact of Brexit on economic growth and resulting housing requirements? has the council ruled out all other sites such as Brownfield and less site sensitive sites? Positively prepared - has the council consulted other neighbouring authorities to see if they can accommodate potential sites as opposed to destroying greenbelt in an area like Greetland that already requires most people to travel to work by car? Effective - placing such a significant number of houses in such a small community is not deliverable and there are no significant infrastructure plans in place to evidence that it is sustainable. Is the plan consistent with national policy? No, my summarised objections to this site allocation are: - disproportionate growth of 33.8% to the Greetland Community which contradicts Greenbelt policy to restrict urban sprawl - No exceptional reasons to remove Greenbelt status - Strains on existing road and junction infrastructure with little planned mitigation for these new proposals - Loss of habitat and wildlife - Unmeasured impact on air pollution for both the area as a whole and the local primary and preschool sites on Saddleworth Road. These objections are substantiated below to relevant policy. Disproportionate increase to the Greetland Community. - LP26, LP177, LP953 and LP1625 are so close in proximity that they should be viewed jointly as well as individually. Calderdale Infrastructure Delivery Plan 2019, Table 3 shows the Distribution of household growth for 2018-33. It incorporates Elland, Greetland, Stainland and Holywell Green into one group. As such, expected percentage change in household growth is 8.21%. - This fails to give the Inspector a clear image of the distinct communities within our wider area. This is an oversight as the NPPF under Achieving Sustainable Development Section 2, point 8 states a "social objective" "to support vibrant and healthy communities. The Cambridge Dictionary defines community as - "the people living in one particular area" Elland is 2.4 miles from Greetland postcode HX4 8PG and as such should be considered as a separate area. (Apple maps). Looking at the ward map for Calderdale, the community of Greetland should be defined by the interlinking of the Greetland and Sunnybank wards, with the possible inclusion of West Vale. This is due the proximity of the housing in these wards and the significant infrastructure and environmental effect that would be concentrated in this space. See link for ward map: www.calderdale.gov.uk/v2/maps/offices-political Under the Calderdale Review of Polling Districts 2019, the number of properties per polling district is as follows: - Greetland 1221, Sunnybank 505, West Vale 1119. This totals 2,845 properties. - Under additional local site assessment reports LP26, LP177, LP952 and LP1625 are all in immediate vicinity of Greetland and Sunnybank wards. Combined we would see 543 additional new houses built in this distinct community on top of capacity allocated in the 2018 plan. As a percentage of the 3 wards this would see a disproportionate growth of 19% or 22.4% when adding in the 2018 site allocations. - Many locals have further purported that the West Vale Ward is a community in itself (having its own primary school) which would take growth of Greetland and Sunnybank to 31.4% or 33.8% when including 2018 allocations. (<https://www.calderdale.gov.uk/v2/sites/default/files/Returning-Officers-Recommendations.pdf>) Within the Potential Sites considered and rejected report CC37, LP1028, which is also in Greenbelt, had a planned site of 122 dwellings removed. One of the reasons stated is that it would give a "disproportionate increase to Barkisland village". The increase based on the same dataset above would have been 16.6%. If Barkisland can be pulled out of its grouping with Ripponden and Rishworth then we suggest that Greetland can be distinguished from Elland. If 16.6% is disproportionate to one village why is 22.4% or even 33.8% not disproportionate to another? Perhaps the answer to this is sadly in the other reason why LP1028 has been withdrawn lack of interested developer! This shows lack of consistency in application of NPPF policies. Furthermore, The Sustainability Assessment Report for LP26, OBJECTIVE TO CREATE AND RETAIN HEALTHY VIBRANT AND INCLUSIVE COMMUNITIES has been given as 'overall impact is positive as the site is within a 0-15 minute journey of a town centre; is within 600m of Public Open Space; and within a 15 minute journey to a GP surgery'. This fails to take into account that the massive increase in traffic from the combined sites will increase travel time substantially, is reducing open space by building right next to a public footpath where people enjoy the view of open space and the local GP surgery is full and may no

longer be within 15 minutes due to the increase in resulting traffic . The Cabinet report on Potential Modifications to the draft Local Plan paragraph 1.4 states that ' a sound Local Plan delivers a sustainable scale and distribution of new homes....whilst protecting and nurturing our environment'. - This scale of distribution (22.4-33.8%), within one village community, is not sustainable given the infrastructure shortfalls of traffic, schooling and other services. - The Sustainability Assessment reports for all 4 LPS for OBJECTIVE 5 TO IMPROVE ACCESSIBILITY TO ESSENTIAL SERVICES, FACILITIES AND EMPLOYMENT have been marked as positive yet they all note the risk of demand on existing services whilst not making plans for mitigation. - This also contradicts the purpose of Greenbelt to restrict urban sprawl (paragraph 134 NPPF) and would also decimate 23.74 hectares of Greenbelt with no exceptional circumstances given (measurements taken from Local Plan Assessment Reports). - This also contradicts the purpose of Greenbelt to -“ assist in safeguarding the countryside from encroachment” All 4 LPs against The Sustainability Assessment of OBJECTIVE 13 TO ENSURE EFFICIENT USE OF LAND have been marked negative as it is all greenbelt. - Whilst we may be 'close' to transport investments (paragraph 1.5 Potential Modifications report) such as the A629 and potential Elland station etc the fact remains that most people will get in a car to get to these links. The only way to do this is via the 2 bottleneck crossroads in West Vale. - Graphs found on city ward explorer shows Greetland and Stainland as already having the highest percentage of cars per household in Calderdale at 84%. Equally it also shows that the average distance travelled to work is 13.2km. - By creating more houses in this area it will only add to congestion and air pollution which will not assist the council in reducing the Green House Emissions noted in paragraph 4.15. Nor does it support the councils wish in paragraph 4.2.1 to reduce car use. Additionally. Paragraph 103 of the NPPF states -“ Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health” There are no immediate plans for economic employment growth in Greetland hence no limiting of travel to the additional proposed 543 dwellings. In all likelihood we will see a significant increase in car usage as existing buses that service west Greetland are small and infrequent. The LP is also over 2km from a railway station. NPPF Paragraph 108 states that -“in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: a) appropriate opportunities to promote sustainable transport modes can be ; or have been ; taken up, given the type of development and its location; - The location of the site in an out of town Greenbelt area lends itself to car use - 84% of this population own a car. b) "safe and suitable access to the site can be achieved for all users;" - The Sustainability Report for LP26, Objective 2 to improve safety and security, shows an uncertain outcome hence this has not been ensured. The junction of Scar Bottom Lane and Gate Head Lane which are most directly effected by LP26 and LP952 is not adequately mitigated. In order to accommodate the resulting traffic and proposed roundabout the road would need to be widened, thus removing trees under Tree Preservation Orders. There would also be a knock-on effect of danger to the top entrance of Brian Royd Lane. This lane (as an extension to the lower part of Scar Bottom Lane) has restricted visibility and is already used as a cut-through. This will only get worse. - Equally, no mitigation had been put in place to improve road safety outside Sunnybank Preschool and Greetland Academy which is already frightening at peak times of day with school traffic, tractors and Sonoco HGVs. - Calderdale are also planning the creation of an A58 Ripponden HGV Turning Circle. This has a significant impact on the Greetland area as it will encourage HGVs onto Saddleworth Road. I picture a mini roundabout at the bottom of LP26 with HGVs coming from the west, SONOCO trucks from the east, the local bus from the north oh and hundreds of new residents and the usual tractors! This is not safe or suitable access! - NPPF Paragraph 111 states -“All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed” I ask the council to define 'significant amounts of movement' and ask do the sites combined represent significant amounts of movement and has a travel plan for these combined developments been or needs to be generated? Major development is defined as: - “For housing, development where 10 or more homes will be provided, or the site has an area of 0.5

hectares or more" suggest that the combined LPs area of 23.7 hectares will lead to significant movement. In order to be 'sound' and in accordance with the NPPF the plan should be positively prepared 'on a strategy which seeks to meet objectively assessed development and infrastructure requirements'. - With reference to the Calderdale Infrastructure Delivery Plan, Table 5: Congested Locations and Associated Funding Opportunities, the location of Stainland Road/Saddleworth road is considered and notes "upgraded signal improvement and localised traffic management needed". - This will be woefully inadequate for potentially 1000 extra cars as evidenced by the outburst of laughter at a community meeting when suggested that signalling upgrades enough would be sufficient. In fact WSP Parsons Brinckerhoff Report on Transport Network states traffic congestion at the juncture of Stainland Road-Saddleworth Road would increase by approximately 105%. The junction is already maxed out. - The infrastructure plan also highlights investment needed in West Vale and buses given priority. However, many of the bus stops in Greetland are unsafe, based on opposite sides of the road and are on routes which are too narrow so a complete overhaul of the bus infrastructure would be needed to accommodate this many people. - I do not feel that an adequate infrastructure plan is in place for this level of growth in one village community. The lack of infrastructure also contradicts paragraph 72 of the NPPF: NPPF 72. "The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:" - Calderdale does not have the support of the Greetland Community, only that of a couple of individual landowners and private developers. 33.8% is a 'significant extension' and we have not seen a thorough investigation of infrastructure requirements at a level local to Greetland. "a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains; " - With the destruction of 23.74 hectares of Greenbelt there will be no environmental gains, only significant losses to wildlife. The areas covered by LP26, LP177, LP952 and LP1625 represent a wildlife corridor home to deer, badgers, bats, owls, herons and many more species. "b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations)" - As a community we have seen no plans for sufficient access to services. The local school, doctors, dentists etc are full! A community should not be grown to the extent stated above without mitigation certain and planned. - The Calderdale Sustainability Report for Option 4 shows uncertain impact for accessibility to essential services. Also, the sites are more than 2km from a railway station and have limited bus services and thus access to sustainable forms of transport. This also goes against policy guidelines. Flooding - I also question the ability to build quickly on LP26, LP177, LP952 and LP1625 due to local flooding issues. Many of these issues occur further up the hill in Upper Greetland with natural spring water that flows from Norland. There are ample cases where spring water has been diverted either naturally or due to building works and this then has a knock on effect on to the LPs states. This is often due to water that has been diverted due to building higher up and insufficient up-keep of pipes on private land. - In addition to surveyance of LP26, LP177, LP952 and LP1625 a full investigation of the water flows throughout Greetland needs to be conducted. LP26, LP177, LP952 and LP1625 act as a flood plain for the whole hillside. Building on these run-off areas should not start until the knock-on effect has been calculated for the whole village. - Indeed, this links to information on the Planning Portal PPS15: Planning and Flood Risk which states "B10 New development, whether building works, engineering operations or changes in land use, can increase flood risk. Most simply, siting a building within an area likely to flood will increase the direct risks to that building. The greater the quantum of construction, the greater the consequences of a flood event are likely to be. While the direct consequences of flooding for a building are generally readily identifiable, less

obvious but equally significant indirect impacts can be caused elsewhere. <https://tinyurl.com/vyeaxrr> Is the council satisfied that indirect impact of flooding elsewhere in the area has been adequately assessed and risks mitigated? - The Sustainability Assessment report for LP26, OBJECTIVE 7 TO REDUCE THE RISK OF FLOODING AND RESULTING DETRIMENTAL EFFECTS ON PEOPLE AND PROPERTY is reported as Uncertain. 'Overall the impact on this SA Objective is uncertain, and any impact will be dependent on the design of any future development and any mitigation measures.' How can land be released when a full risk assessment has not been carried out? - LP177 has a negative outcome for this objective. NPPF paragraph 91 states "enable and support healthy lifestyles, especially where this would address identified local health and well-being needs ; for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling." - Building on LP26, LP177, LP952 and LP1625 would have a detrimental effect on healthy lifestyles of the Greetland Community. These open spaces are often used for walking. The effect of existing open space on the community's mental wellbeing is also important. The World Health Organisation on its own website states: "Green spaces also are important to mental health. Having access to green spaces can reduce health inequalities, improve well-being, and aid in treatment of mental illness. Some analysis suggests that physical activity in a natural environment can help remedy mild depression and reduce physiological stress indicators." <https://www.who.int/sustainable-development/cities/health-risks/urban-green-space/en/> NPPF 94. "It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education." - The current capacity of Greetland Academy on a split-site is well suited to the size of village. Currently, children within the village can access the school with intake occasionally taken from some surrounding villages. If over 600 new houses are built then a situation will arise in which demand will outweigh supply, families who live in Upper Greetland, and even close to the KS2 site, will be forced to leave the village and drive to other schools to find a place as they will no longer be in the catchment area. Greetland Academy is already a 2 class intake. This enables it to maintain a village school atmosphere. As an Academy this school cannot be forced to expand so where is the plan for additional school places? NPPF Paragraph 117 states -"Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land"- Is the Inspector satisfied that Calderdale has fully investigated all brownfield sites for housing purposes? Residents are not convinced this is the case! Greenbelt is being destroyed because developers are more interested in building on it! - The inclusion of this number of homes along Saddleworth road will significantly increase air pollution and I would challenge Calderdale Council to model this effect in order to understand true mitigation. This is especially serious as the location is so close to a primary school and a preschool. The locations of these schools are on the main road and at water level. We have seen no modelling of the potential increase in harmful emissions that I am aware of and the effect this would have not only on the wider community but vulnerable school children. - The NPPF under paragraph 170e highlights that new developments should not add to air pollution. Increased car usage from over 600 new houses will lead to increased air pollution. Objective 10 in The Sustainability Assessment reports for all of these LPs in Greetland has been marked uncertain and hence these plans are not necessarily in coherence with the NPPF because the plan does not ensure that there will not be an increase.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Duty to Cooperate Under the Localism Act 2011, Section 33A "Duty to co-operate in relation to planning of sustainable development", Paragraph 3 lays out the duties required of the local council of which points a

and b require preparation of local plans. Point d however calls for "activities that can reasonably be considered to prepare the way for activities within any of paragraphs (a) to (c) I question if Calderdale has sufficiently carried out all all activities needed to form a sustainable local plan with specific reference to show that release of Green Belt in LP26, LP177, LP952 and LP1625 meets exceptional circumstances?: - i.e. has all brownfield been explored as per NPPF paragraph 137? Has land recently regraded to brownfield on LP177 at the end of Ellistones Lane, and pending vacation of the Freundenberg factory been considered? It is CPRE's view after meeting local residents that they consider these brownfield sites broadly positive. - I also question if there has been adequate exploration of infrastructure requirements and mitigation for a 33.8% growth in a community? - The council has provided a Sustainability Appraisal Report. However, under preferred Option 4, 9 of the 17 objectives analysed have been marked as - "uncertain" impact. I question how fully the necessary 'activities' needed to form a sustainable plan have been carried out? e.g. risk assessment and necessary mitigation. How can a plan be sustainable and Green Belt destroyed when there are so many question marks? At a site level: LP26 has 10 uncertain impacts, 1 negative and only 1 positive LP177 has 9 uncertain impacts, 4 negatives and only 3 positives LP952 has 11 uncertain impacts, 2 negatives and only 3 positives LP1625 has 11 uncertain impacts, 1 negative and only 4 positive Disclaimer: I am a lay person, not a lawyer or planning expert and refer back to my comments under 'is the plan legal'. If these questions have been answered incorrectly or insufficiently it is due to the process having neither clarity or simplicity of use.

Suggested Modifications:

I feel that there more adequate site assessment including greater risk analysis is necessary before a site allocation of this number can be released from greenbelt and the plan deemed sustainable. Also, I'd ask the council to revisit an analysis of brownfield sites for any new and existing opportunities both in our authority and within neighbouring authorities.

Comments:

Additional Evidence Link:

Comment ID **HRU339**

Site ref (if applicable): **LP0952**

Person ID: **1242362**

Name: **Mrs Elaine Scott**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

It ignores all planning advice/requirements regarding environmental and social issues.

Do you consider the plan to be Sound?: **No**

Sound Reason:

No proper account is taken of the following Flood risk Preservation of wildlife corridor Congestion in West Vale Lack of infrastructure The Defra 25 year plan clearly states-We will protect ancient woodlands and grasslands, high risk flood areas and our best agricultural land.Protect our green belt to make this land a breathing space for our urban populations to enjoy and our wildlife to flourish. NPPF explains in paragraph 80 the 5 purposes of green belt land. I think this speaks for itself,any development on this site goes totally against those 5 functions and against the Defra plan.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

The consultation period is minimum. Very little information has been given to local residents who therefore have insufficient time to consider, prepare and submit objections.

Suggested Modifications:

The only option is to remove this site from the plan and consider more suitable brown field sites.

Comments:

Additional Evidence Link:

Comment ID **HRU345**

Site ref (if applicable): **LP0952**

Person ID: **1242408**

Name: **Miss Bryde Town**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Please see attached PDF

Do you consider the plan to be Sound?: **No**

Sound Reason:

Please see attached PDF

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Please see attached PDF

Suggested Modifications:

N/A

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5600226>

Comment ID **HRU453**

Site ref (if applicable):

Person ID: **1242405**

Name: **Mr Michael Bridgman**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Assuming that this proposed development will result in a significant increase in tarmac roads and driveways then the ability for the land to soak water away will be significantly diminished. Flooding risks will therefore be consequently increased. Surely in line with other parts of the Calder valley and places with similar issues nationally, the right approach should be to plant trees upstream and to build leaky dams rather than to erode flood plains and soak away areas. This strategy will not only affect the Greetland community but will also impact negatively on West Vale, Elland and Brighouse properties and residents. A development of this size will undoubtedly have environmental impacts. Wildlife will be affected negatively, green spaces will be substantially diminished and traffic congestion and air pollution will be very much on the increase. These undoubted consequences are completely at odds with the widely publicised strategies which are currently emanating from National Government and from forward-thinking Councils to deal with environmental and climate change issues. This plan has not been formulated on a sound basis.

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 **HRU455**

Site ref (if applicable):

Person ID: **1242613**

Name: **Ms Rowena Burton**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

The proposals are not sound for any of the designated sites in Greetland for the following reasons:- The prediction of economic growth is based on out of date figures (2016) which were pre-Brexit. It is difficult to see where 600 new households in Greetland would find employment locally; it is more likely that we would be a dormer village serving Manchester and Leeds. When development is proposed, there is talk of affordable housing and best use of space, but in reality, developers are not held to account - all we see in this area are executive 4 or 5 bedroom homes that take up lots of space and don't serve the community.

Most egregiously, the plans go against the NPPF's Green Belt policy: there would be -“unrestricted sprawl”-“merging of neighbouring towns”-and no -“safeguarding the countryside from encroachment.” West Vale and Greetland would become a huge housing estate without amenities, no sense of community, no visual amenity and no Green belt land for recreational purposes. There are still unused brownfield sites in Calderdale (including West Vale) so there is no evidence that there is an -“exceptional circumstance”-to take away the Green Belt for ever, especially in an era when every person and institution should be doing their best to mitigate the effects of climate change. Development on Green Belt completely undermines your vision of -“a preserved, enhanced natural landscape,” p.26 of the Local Plan Vision. People who live locally don't want to and should not have to travel on a daily basis to another recreational Green Belt area in Calderdale when they currently have open space and a wildlife corridor on the doorstep. The contention is that the proposed development is sustainable, but nothing could be further from the truth:- Siting development with the proposed access at the bottom of Scar Bottom Lane is problematic. The road is mostly unadopted, single track with no passing places and eroded at the top (combination of lorries and water). It will not be possible to stop potential new residents using Scar Bottom Lane as a rat-run between Rochdale rd and Saddleworth rd. The Highways department has already refused planning permission on several occasions because of access and safety issues on Scar Bottom Lane. Currently, there are long traffic queues at the traffic lights in West Vale (at both Saddleworth rd and Rochdale rd junctions) and not just in the morning and at the end of the working day. Road improvements on the A629, A58 and M62 will not help this situation as residents and those from outside the area forced to come through Greetland have to brave West Vale before reaching the improved road systems; indeed the improvements could engender more traffic keen to travel to bigger urban areas. The roads in the villages are single track with no viable prospect of changing to dual carriageway. 600 houses would involve at least 1,200 more vehicles on the roads leading to West Vale. Tinkering with the sequencing of traffic lights isn't going to help. It is already possible to smell and taste the air pollution on the approach to West Vale at busy times. A huge increase in the volume of traffic can only have a detrimental effect on the physical and mental well-being of residents. Levels of pollution may be illegal - when was a study last carried out? The Council could already be in contravention of the Clean Air Strategy 2018. The schools (primary and secondary) and doctor's surgery are already oversubscribed. There is nothing in the plan to remedy this situation or the fact that regeneration in West Vale has been about restaurants and night-life and not about catering for the every day needs of the vast numbers of prospective new families in the area, were the plan allowed to go ahead. On page 24 of your initial Local Plan Vision you commit to -“ensuring the risks of flooding are significantly reduced.” Building houses in Greetland flagrantly contradicts this intent. The lower areas of the proposed sites act as flood plains and uncharted springs and water courses are everywhere on the hillsides. Engineers who dealt with our flooding on Scar Bottom Lane in 2015 (the water from here then flooded properties and land below in Saddleworth rd environs - it has to go somewhere) said it would be very unwise to build on the hillsides or the flood plains as the water course is so unpredictable. Every year in this area, private property and land is flooded, but different people are affected because the course of the water changes. Losing the flood plains would cause a back-up of water further up the hillside and the loss of green land to development would mean more flooding as there would be nothing to absorb it on its journey. Stop press: the most recent flooding on 9/2/2020 clearly demonstrates why taking away Greenbelt land is reckless. We have had localised flooding on Scar Bottom lane for months now. The developers who own the land have failed to mend infrastructure which would have ameliorated the situation so the Council kindly agreed to sub-contract a firm to mend the pipes. The road was dry for a week until Ciara struck and demonstrated how the whole area is vulnerable to flooding.

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU459**

Site ref (if applicable): **LP0952**

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:

Not enough time or consultation given to residents to contest this

Do you consider the plan to be Sound?: **No**

Sound Reason:

LP0952 is Part of the Greetland Green Belt. I do not feel that Calderdale should be building houses on any part of the Green Belt. GREENBELT The Council have not given enough consideration to use other land, such as Brown Field Sites and until all other available land is used, I do not believe Green Belt land should be built on. They should be utilising other plots in Halifax - derelict, empty, mill buildings that could be used instead. The Council have said that it is more difficult and more expensive to build on Brown Field sites. But this does not comply with allowable reasons for the Green Belt to be built on. URBAN SPRAWL By building on LP0952 we will be contributing to urban sprawl, by merging neighbouring areas and villages. The Green Belt should be maintained so that this can be avoided. CHANGING THE NATURE OF THE COMMUNITY Greetland has about 1225 houses and about 2500 inhabitants. The 246 houses in this plot, together with the other plots (LP0026, LP0177 and LP0157) means an extra 600 houses, which is a huge number to add on to a small community, and will change the nature of Greetland. Our Doctors Practice is already struggling to see patients, the Dentist is not taking any more patients, and the Schools are full. FLOODING. A large part of LP0952 is at this moment flooded. Black Brook is a spate river, which regularly floods into the surrounding fields. Considering the problems Calderdale has with flooding, it would be fool hardy to build houses on this land. There are numerous underground springs in this part of Greetland, which run down from the hillsides. Building and covering large parts of the run off area will cause more flooding, not just here, but it will also have an impact further up the river to Elland. We have already had severe flooding which caused Elland Bridge to be closed for 2 years for vital repairs. More houses, more roads, more land built on will just make this worse. And why would people buy houses on land that is in danger of constantly flooding? Will they be able to get insurance cover? WILDLIFE Greetland is a small rural community. We have deer, badgers, horses, squirrels and small animals thriving in this wildlife environment. Building 246 houses will destroy many of the natural habitats, and thus destroy wildlife. CONGESTION Greetland has two main roads Saddleworth Road and the Rochdale Road. Both of these struggle to cope with the existing traffic levels, and the traffic jams at the crossroads at West Vale are a nightmare. 246 extra houses on this plot, could mean in excess of 500 more cars on the road, with more carbon emissions to threaten a clean air environment.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

I feel that the Council have not been helpful or transparent about the inclusion of Greetland Green Belt being re-introduced into the Local Plan.

Suggested Modifications:

Do not build on the Green Belt.

Comments:

Additional Evidence Link:

Comment ID **HRU469**

Site ref (if applicable):

Person ID: **1242431**

Name: **Mrs Nicola Boon**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

1) Disproportionate amount of building in the Greetland area. The latest revisions to the local plan are deeply unsustainable development particularly the fact that a disproportionate amount of new homes are proposed on four sites in Greetland which for the plan is grouped under Elland. Within the plan 1,708 new housing sites have been proposed within the Elland area with 1,041 of these units (over 60%) proposed in Greetland when there are other sites available which won't place as much collective strain on one village.

2) Additional Flood risk LP0026 -Currently this site provides a natural overland flow storage area prior to it flowing over Saddleworth road down into Black Brook. It was evident on Sunday 9/2/20 following the rainfall similar to the 2015 Boxing Day floods that any hard landscaping/alterations to the natural characteristics of this area would provide further runoff onto Saddleworth Road and subsequently Black Brook. This land is vital absorption area to prevent overland flow therefore it is strongly advised not to develop on this piece of land. LP0177 / LP0952 / LP1625 All three of these parcels have demonstrated their unsuitability for development during Storm Ciara 8/2/20 & 9/2/20 whereby rainfall levels were close to the 2015 Boxing Day floods. Water has been visibly running over ground and within the ground down the sloping nature of the land down to Black Brook causing flooding to the properties along Black Brook and also contributing to the already at capacity River Calder causing extensive flooding. Parcel LP0177 which clearly lies with Flood Zone 3a has been particularly affected today with extensive flooding. Development will not ease or mitigate this flood risk as there is no substitute for nature's only defence within periods of rainfall which is a floodplain which this last is! The other two parcels did not necessarily flood to the same extent however the flow of water which these fields were taking today, from higher up the valley and Saddleworth Road runoff, provided important lag time to this flow further working with this natural defence mechanism which the valley holds currently. Development would destroy this natural defence barrier and also disturb the watercourses which aren't visible above ground such as the minefield of uncharted natural springs ; which from local knowledge have been re-routed following excavation for developments causing issues elsewhere in the village. No amount of development engineering will be able to improve the hydrology of this valley. See photos below of Black Brook from 9/2/20

3) Sustainable

development These pieces of land are clearly within an area of Greenfield and is a natural break in the boundary of the village into the countryside leading up to Barkisland with only existing farmsteads currently situated on the land. If these parcels are to be developed it would not be a sustainable development, it would merely be urban spawl of a village. Sustainable development would be re-using Brownfield sites not Greenfield sites which are available in West Vale or less sensitive areas in Stainland which were removed from the previous Local Plan. 4) Traffic impacts West Vale is currently at breaking point with the amount of traffic which passes through on a daily basis therefore why would the situation improve with a further 600 homes. West Vale is a vital access route for the valley and surrounding towns and villages and with additional vehicles, a natural bi-product of development, would become dangerously congested. There is no obvious solution to ease the pressures of traffic on West Vale and despite attempts in process of improving the A629 junction, Rochdale Road crossroads still this doesn't make it acceptable to subject near double the number of vehicles as research shows below. WSP Parsons Brinckerhoff Report on Transport Network states that: "£ This report identifies that traffic congestion at the junction of Stainland Road-Saddleworth Road would increase by approximately 105% "£ This report also identifies that traffic congestion at the juncture of Stainland Road-Rochdale Road would increase by over 100% 5) Impact on Air Quality This undoubtedly will deteriorate with the development of any of these parcels due to increased traffic from both construction and occupants. This is why there is a need to plant more trees within the Ward. This will be negated by the building of so many houses. The current air quality needs to be assessed. 6) Infrastructure As a resident of Greetland who drives along Saddleworth Road and Brian Royd Lane daily I believe that the existing infrastructure of the village would not cope with the additional development proposed. Over the last few years there has not been a month gone by whereby there has not been a water main burst on Saddleworth Road due the aging cast iron water main which has still not been upgraded fully causing regular traffic disruption. The road itself is poorly maintained by the council and now you are wishing to subject to road to all the construction related traffic which would be as a result of development and furthermore the occupants upon its completion. Local Schools are all full - both Greetland Academy and Brooksbank, Elland. The land allocation has not made any reference to providing land for expansion of the Key Stage 1 site on Saddleworth Road which would be effectively surrounded by LP0177. Our children of Greetland would lose the rural outlook and ability to be taught about this vital wildlife corridor and would end up being brought up and educated in an urban environment ; as a parent of a Key Stage 1 pupil this outlook and important wildlife corridor was one of the attractive qualities of the Greetland Academy. With a proposed 600 houses, using Calderdale MBC's figure for school places of .36 per household (IDP section 9.14) this indicates another 206 places would be needed. Local Dentist has a waiting list of 600 for NHS places. The nearest NHS dentist was recently found (July 2019) 11 miles away in Kirklees. The GP Surgery would be strained to take this proposed capacity given when the practice is already on a waiting list basis for new patients with patient levels already at 11,334 patients in 2019 covered by 5 doctors. There would also be a further strain on local Hospitals. On the basis of the above points I strongly advise that the greenfield sites within Greetland are removed from the Local Plan in favour of more suitable sites.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5602887>

Comment ID **HRU477**

Site ref (if applicable): **LP0952**

Person ID: **1242401**

Name: **Mr graeme britteon**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Please read this section of the Consultation Portal in conjunction with the comments I have made in the other two sections as many comments are relevant to all sections available on the Consultation Portal. The Local Plan does not address the implications of the National Planning Policy Framework, especially, NPPF Para 177 and the associated PPG in the Sustainability of Greenbelt Sites. The site assessment for LP0026 shows that out of 17 Sustainability Assessments, the allocation has 10 Uncertain Assessments and 1 Negative Assessment. According to the NPPF Para 143 under 'Proposals affecting the Green Belt' it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' Those very special circumstances simply do not exist and all other more appropriate sites should be included in the Plan before Green Belt sites such as this one. There are no justifiable exceptional circumstances for change of use of this area of Greenbelt land. Although Calderdale Council do recognize some (but by no means all) elements harmful to the Green Belt in their plan, they offer only feeble mitigation against that harm. Calderdale Council need to demonstrate that the Local Plan will enhance those areas where development is proposed and that the development will not negatively affect the existing local communities and the environment in which they live. They have singularly failed to do this. I feel that these plans have not been properly considered and I strongly believe that they will negatively impact upon the environment and the quality of life in the community for years to come.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Please read this section of the Consultation Portal in conjunction with the comments I have made in the other two sections as many comments are relevant to all sections available on the Consultation Portal. Calderdale Council is basing its estimate of the future need for houses on out-dated information. As we are no longer members of the EU it should revisit those estimates. I do not believe that overall requirement for housing will be as great as stated. In reference to this site reference number, LP0952, and sites LP0177, LP1625, and LP0026, there are a number of issues which apply as a result of the scale of proposed development in the Greetland area. There seems to be a grossly disproportionate emphasis that the Plan has upon some communities, particularly Greetland, which are accommodating far in excess of a fair, reasonable and balanced share of development given their relative size. The resulting 'Urban Sprawl' that this plan would create in the Greetland area will have many negative consequences for residents and the environment, such as higher water and air and noise pollution, increased traffic fatalities and congestion, and increased car dependency. The traffic congestion issues, already evident on Saddleworth Road and Stainland Road, do not appear to get any significant recognition in the plan and adding 600 houses at the side of Saddleworth Road will only serve to exacerbate the problems. The potential increase in car journeys in the area will undoubtedly contribute to increased air pollution, particularly affecting vulnerable young children walking to and attending the local school at the side of Saddleworth Road. The existing infrastructure barely meets the needs of the current population of Greetland so increased capacity of schools, dentists, and GP surgeries would be needed to service such a significant increase in the local population. The development of these sites would be against all five functions of Green Belt and, most decisively, would mean the coalescence of Greetland and West Vale and the deterioration of the identity

of both places, thus undermining the Council's Settlement Hierarchy. This area of Greetland has an abundance of wildlife due to the natural and undisturbed environment. When walking up the valley I have seen heron, kingfishers, dippers, nut hatches, kestrels, owls, pheasant, and woodpeckers. I have seen foxes, deer, moles, and field mice in the fields above Black Brook and observed brown trout in the brook itself. We have also watched the bats flying around our garden in the late summer evenings. Development here would eradicate a number of species who are reliant upon the Eco system which currently exists here. There are also ecological constraints with regards to Black Brook as it is a UK Biodiversity Action Plan Priority Habitat. In addition, the Woodland Trust has recently supported an application for the donation of over 100 indigenous trees specifically recommended for this area. There are many natural springs on the hillsides above Black Brook which run down through sites LP0026, LP0952, and LP1625, and site LP0177 (a high risk flood area) is partly situated on a natural flood plain. Any development on these sites, which act as a natural and essential soak away, would add to the run off of rain and spring water and would exacerbate potential flood damage further down the valley, into West Vale and beyond. To comply with current legislation on flooding these sites should be removed from the plan. Large open spaces are needed for the mental and physical health and well being of all. Urban sprawl has many negative consequences for residents and the environment. The wooded valley walkway along the side of Black Brook provides a popular area for many of the local residents to enjoy leisure activities (walking, running, cycling etc.) away from the rigors of everyday life and free from traffic and air and noise pollution, yet within walking distance of existing communities. This is an invaluable asset to the community and must be safeguarded from any future development.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Please read this section of the Consultation Portal in conjunction with the comments I have made in the other two sections as many comments are relevant to all sections available on the Consultation Portal. I have significant concerns about the way in which the process of producing the Local Plan has been conducted. I believe that Calderdale Council should have made more of an effort to communicate the process of the Local Plan to residents and raise awareness of the consultation. I also think that Calderdale Council have produced a website which is not fit for purpose. It is far too difficult and time consuming process for people to respond to the proposals online, a point which may significantly reduce the number of objections and comments about the plan.

Suggested Modifications:

That the 4 sites in Greetland (LP0952, LP0177, LP0026, and LP1625) be removed from the plan.

Comments:

Additional Evidence Link:

Comment ID **HRU500**

Site ref (if applicable): **LP0952**

Person ID: **1241765**

Name: **Mrs Sandra Britteon**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

The plan involves allowing development housing in our Green Belt areas. Areas that have been, and should always be, protected. Protected from the conglomerate developers that seek to destroy our communities, steal our green tranquil spaces, and make profits at all costs. The site assessment for LP0952 shows that out of 17 Sustainability Assessments, the allocation has 11 Uncertain Assessments and 2 Negative Assessments. Under 'Proposals affecting the Green Belt' NPPF Para 143 it states that, 'Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' There are no justifiable exceptional circumstances for change of use of this area of Greenbelt land. Calderdale Council do appear to recognize some harmful elements harmful to the Green Belt in their plan but they offer little in the way of mitigation against that harm. The plan seems to give little value to 'The value of 'Open Space and Recreation' and 'Access to a network of high quality open space' and the Environmental Health section of the Site Assessment Report states that 'There is no significant detrimental effect that cannot be mitigated against'. How can Calderdale Council mitigate against the loss of Greenbelt land, the loss of open spaces and valuable countryside on our doorstep, and the decimation of all the environmental benefits that are provided by them and which are currently enjoyed by your local community? These green spaces are very very important to me and my family and I would hope that they can be valuable to generations to come.

Do you consider the plan to be Sound?: **No**

Sound Reason:

There are several issues with the soundness of the plan for this site which are also applicable, individually and in total, to all these sites (LP0026, LP0177, LP0952, and LP1625) in the Greetland area: All these sites are marked as Greenfield but should, in truth, be marked as Green Belt sites. All perform strongly against the 5 Green Belt purposes. As such they should be designated as 7th or 8th on the list of suitable sites according to Calderdale Council's own Sustainability Appraisal 2018 document. The land earmarked for housing in the Greetland area falls within the wider Elland region and there is a disproportionate allocation to Greetland than other parts of the Elland region, with Stainland not being allocated any housing at all. There is a significant risk that 'Urban Sprawl' will further nibble away at the surrounding countryside and there will be many negative consequences for residents and the environment, such as higher water, air, and noise pollution, increased traffic fatalities and congestion, and increased car dependency. The traffic congestion is already a major problem at the junction of Saddleworth Road and Stainland Road and at the junction of Rochdale Road and Stainland Road. Recent road works have a major devastating effect on travel times through these two overstretched junctions. Adding 600 houses at the side of Saddleworth Road will only serve to exacerbate these problems. Air pollution is another issue that will be affected by such a large scale addition of houses in a relatively small space along side a single main road. The potential increase in car journeys in the area will undoubtedly contribute to increased air pollution which will particularly affect vulnerable young children walking to the local school at the side of Saddleworth Road. The existing infrastructure struggles to meet the needs of the current population of Greetland so increased capacity of schools, dentists, and GP surgeries would be needed to service such a significant increase in the local population. Sewers are already prone to flooding and overflowing causing further health hazards. The area around these four sites is mainly Grade 3 agricultural land which by Calderdale's own recognition in the Sustainability Report will become an increasingly important commodity in the light of climate change. The Woodland Trust has recently supported an application for the donation of over 100 indigenous trees specifically recommended for this area. The hillsides above Black Brook are riddled with natural springs from the moors which run down through sites LP0026, LP0952, and LP1625, and site LP0177 (a high risk flood area) into Black Brook and to a natural flood plain along side it. Any development on these sites, which act as a natural and essential soak away, would add to the run off of rain and spring water and would exacerbate potential flood damage further down the valley, into West Vale and beyond. To comply with current legislation on flooding these sites should be removed from the plan. Large open

green spaces are required for the mental and physical health and well being of all and Urban sprawl has many negative consequences for residents and the environment. The wooded valley walkway along the side of Black Brook provides a popular area for many of the local residents to enjoy leisure activities (walking, running, cycling etc.) away from the rigors of everyday life and free from traffic and air and noise pollution, yet within walking distance of existing communities. This is an invaluable asset to the community and must be safeguarded from any future development.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

There are significant concerns about the way in which the Local Plan has been formulated and worries too about the involvement and influence of major developers on the selection of suitable sites. I feel that Calderdale Council should have made a better effort to communicate the process of the Local Plan to residents and done more to raise awareness of the consultation. I also think that Calderdale Council's website is a maze of screens, reports, and links, that are very difficult to navigate through and to fully understand. Their user guidelines are minimal and provide no real help in getting you to the right place to make a comment. It is far too difficult and time consuming process for people to respond to the proposals online, a point which may significantly reduce the number of objections and comments about the plan.

Suggested Modifications:

That the 4 sites in the Greetland area (LP0026, LP0952, LP0177, and LP1625) be removed from the plan.

Comments:

Additional Evidence Link:

Comment ID **HRU504**

Site ref (if applicable): **LP0952**

Person ID: **1242754**

Name: **Mr Warren Goodall**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **Yes**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

No proper account is taken of the following Flood risk - we are all aware of the devastation caused in Elland in 2015 and 2020. Development on this site would increase the risk of future flooding lower down the valley and into Elland. Preservation of wildlife corridor - this area is home to many species of wildlife deer, foxes, rabbits, squirrels, heron, owls, sparrow hawks and bats are all frequently seen and should be protected. Congestion in West Vale leading to further reduction in air quality and potential health risks for this and future generations. Lack of infrastructure- local schools are already oversubscribed, GP and dental facilities would be unable to accommodate the increase in population. The bus service in this area is infrequent and would not serve an increased population adequately, the lane at the side of this site is not wide enough for 2 cars to pass which would cause further congestion and for most of the lane there is no

footpath for pedestrians so totally unsuitable access to a housing development. There is a public footpath through this and other sites in the development plan which are used by groups and individuals (many from outside the area) enjoying the beauty of open space, and enhancing their physical and mental wellbeing, even if these paths are preserved they would simply become snickets through a housing estate! The Defra 25 year environment plan clearly states we will protect ancient woodlands and grasslands, high risk flood areas and our best agricultural land. Protect our green belt to make this land a breathing space for our urban populations to enjoy and our wildlife to flourish. NPPF explains in paragraph 80 the 5 purposes of green belt land I think this speaks for itself, any development on this site goes totally against those 5 functions and against the Defra 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 **HRU506**

Site ref (if applicable): **LP952**

Person ID: **956607**

Name: **Mr David Scott**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

See attached word document.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Please see attached word document.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

The council, to my knowledge, gave any information to residents as to why these site were re-entered into the Local Plan and why.

Suggested Modifications:

Please see attached word document.

Comments:

Additional Evidence Link: <http://calderdale-consult.objective.co.uk/file/5604896>

Comment ID **HRU513**

Site ref (if applicable): **LP0952**

Person ID: **1241652**

Name: **R Graham Maslen**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Do you consider the plan to be Sound?: **No**

Sound Reason:

Calderdale's Review of the Green Belt in 2017 showed that this plot performed well in the three (out of 5) relevant key purposes of Green Belts as identified in the NPPF. -to check the unrestricted sprawl of large built-up areas; -to prevent neighbouring towns from merging into one another; -to assist in safeguarding the countryside from encroachment; This parcel also meets five of the six objectives for the Green Belt identified by the Local Authority: -to provide opportunities for access to the open countryside for the urban population; -to provide opportunities for outdoor sport and outdoor recreation near urban areas; -to retain attractive landscapes, and enhance landscapes, near to where people live; -to improve damaged and derelict land around towns; -to secure nature conservation interest; and, -to retain land in agricultural, forestry and related uses. Given that this parcel performs well as part of Calderdale's and Greetland's Green Belt the Local Authority has not specified the exceptional circumstances that must be present to develop green belt land. Whilst the Local Authority states it has adopted a sequential approach to identifying potential sites for housing development. It is not exactly specified what the sequence was but the following is included in 'Addendum for Exceptional Circumstances Technical Paper' 2019. Regeneration and brownfield sites near town centres Sites which can be delivered quickly Sites with a creative mixed use New allocations in sustainable locations close to existing or planned transport investments and established transport corridors It is not clear that all the brownfield sites were considered before sites which could be delivered quickly or whether these conditions were considered together. This site would clearly come under the last category. The Local Authority has not demonstrated that it has examined all other options. We need a list of all the potential brownfield sites available in Calderdale and whether they are being developed and if not why not? Anyone walking around Halifax would be aware of the number of disused and derelict sites that have remained undeveloped for years. Why are Green Belt sites even being considered for development when these sites remain vacant? We, as residents in this Local Authority, deserve transparency in relation to this issue. Building 246 houses on this land would extend the built-up area of Greetland and undermine one of the fundamental objectives of Green Belt designation. The development of this site would further contribute to the extension of Greetland towards Barkisland and Norland compromising the integrity of Greetland as a community. This is sloping land and in its site assessment the Council state that the land has -"experienced land drainage problems in the past" The writer of this report should have inspected the site on Sunday February 9th when they would have seen that drainage problems are an ongoing problem as described by Lord Shutt of Greetland in the House of Lords on Monday February 10th (-"I saw the floods yesterday; I saw the Black Brook rise and come over its banks, and I saw it flood into several fields in front of my house from my own front window. I saw the same thing on Boxing Day in 2015." Lord Shutt lives on Saddleworth Road. The site is poorly drained and no amount of SuDS and green roofs will compensate for the loss of an area of agricultural pasture and being replaced by 246 houses. The loss of this land will promote run-off into Black Brook and increase flooding frequency and extent. 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'. The site assessment claims that the ecological survey was -"satisfactory" What does that mean? Part of this plot is

part of the Wildlife Habitat Network and the Site Report states that this should stay together with a 20m buffer. The kestrels, bats, deer, Canada geese, herons, jays, green woodpeckers, barn owls, foxes squirrels, amphibians, tits, finches, sparrow-hawks and marshland newts mentioned in the Site Report will be very grateful for their narrow corridor. With regard to other issues. Highways The comments on the site assessment about highways relate to strategic motorway developments. This is at odds with the Council's own analysis of future work and commuting patterns. In its assumptions it does not envisage any increase in commuting in/out of Calderdale and the increased employment forecast is to meet the expected need within the Local Authority area. The Council should not be concerned about the addition of another junction on the M62 but rather it should prevent adding to the traffic bottleneck at West Vale by advocating this development of 246 houses. In the draft Infrastructure Delivery Plan it states, 'There is a need to provide improvements to the West Vale junctions as a while given their proximity and interaction. This will likely be in the form of upgrades to the signal operation and localised traffic management such review of waiting resulting and rationalisation of traffic movements'. Apart from not making sense this is an inadequate response to existing problems before the addition of 600 houses in Greetland of which 246 are designated on this site. A roundabout at the junction of Scar Bottom Lane and Gate Head Lane completely misses the point. Environmental Health In relation to environmental health again in its site assessment it states that with regard to environmental health it would not recommend residential development on this site because of the proximity of industrial premises which have unacceptable noise and emissions. However the Site Report concludes, 'There is no significant detrimental effect that cannot be mitigated against'. The Report is silent about the form of that mitigation. Infrastructure The NPPF recommends that developments should have regard to the supply of school places and services. There is currently no provision in the Infrastructure Delivery Plan for the expansion of primary school places in Greetland and provision for only an additional 75 secondary places. There are no plans for additional surgeries.

Do you consider that the plan complies with the Duty to Co-operate?: **No**

Duty to Co-operate Reason:

Suggested Modifications:

Preserve this site as Green Belt and do not build houses on it.

Comments:

Additional Evidence Link:

Comment ID **HRU517**

Site ref (if applicable): **LP0952**

Person ID: **1242903** Name: **Mr Martin Moorman** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

This plan in the Greetland area under application numbers LP0952, LP0177 and LP1625 cannot be justified on the grounds of flooding risk, infrastructure concerns including local school and medical practice places and for traffic congestion and climate concerns.

Do you consider the plan to be Sound?: **No**

Sound Reason:

The housing plan for approximately 60 new houses in the Greetland area is unsound. The areas identified are flood plains and have been proven to flood both in December 2015 and as recently as 9 February 2020. Houses built in this area will flood: FACT

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU522**

Site ref (if applicable): **LP0952**

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 & Countryside 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.

Comments:

Additional Evidence Link:

Comment ID **HRU532**

Site ref (if applicable):

Person ID: **1242842** Name: **Mr Simon Matthews** Organisation:

Agent ID: Name: Organisation:

Do you consider the plan to be Legally Compliant?:

Legal Compliance Reason:

The proposals do not fit the spirit, or specific detail of many paragraphs, of the National Planning Policy Framework. However, i do not feel qualified to comment on the legality of the document.

Do you consider the plan to be Sound?: **No**

Sound Reason:

Green Belt The site LP01952 does not meet the requirements of the five tests for use of Green Belt land NPPF (para 134) or show any exceptional circumstances (para 144) where such building could be allowed, but would not maintain openness and instead contribute to urban sprawl (para 133). This is at odds with government's claim to protect the Green Belt ; as reflected in Esther McVey's suggestion that once Green Belt land is built on, it will be gone, probably forever. NPPF para 145 suggests that new building should be

focussed on affordable housing for new-entry purchasers, concentrate on sustainable development and use of brownfield sites wherever possible (para 63), and seek to avoid harm to the openness of the Green belt; however, plans already advertised for local building refer only to 4-6 bedroom luxury houses, not starter homes (as less profit?). Current figures for new housing are built on out-of-date predictions on economic growth in the area; further, if development 18/01189/FUL at West Vale goes ahead to build housing for elderly people, this would free up housing locally so that fewer new houses would be required. Environment and Wildlife NPPF para 174 describes the need to protect enhance biodiversity, habitat and wildlife corridors. This proposed development would do unknown harm to many species ; we regularly see deer, bats, foxes, herons, woodpeckers in the woods by our property, and hear owls most nights, and proposed developments in the area will also lead to loss of mature trees. In addition, the ability to enjoy the environment and walk in green areas is acknowledged to be beneficial to mental & physical health and social well-being (para 8) ; there is a public footpath that runs up the side of this site. Flooding NPPF para 155 states that -“inappropriate development in areas at risk of flooding should be avoided” and that - “development should be safe without increasing the flood risk elsewhere” and also -“to seek to use more sustainable locations where flood risk is likely to be increased” (para 157). When our house was flooded in 2015/16 (on the hill above LP0026), the council engineer told us at that time there is no comprehensive plan or knowledge of the many springs and steams on the land in this area, and a Yorkshire water engineer said the land should not be built on! We already have issues with run-off every time there is a major storm (this week, the storm run off has shattered our waste water pipe and washed away the topsoil, leading to flooding of the bottom of our garden to knee depth) and this water all has to go somewhere. The removal of large areas of grassland reduces the ability of the land so act as a sink for this water as well as leading to an increased risk of flooding to properties and land below us ; part of the the field to be used for LP0026 has visibly suffered from water damage and becoming waterlogged for much of the last four years. Ironically, the junction of Saddleworth Road and Scar Bottom Lane has needed to be dug up for long periods at least three times in this period due to water mains failure leading to our loss of water supply! Yet the council proposes building on this land and other sites sitting on a flood plain - where will the water go? Given that this problem is, and will be exacerbated, by climate change, how does this constitute making provision to mitigate the effects of climate change and increased flood risks? [unable to load video and photographs of the recent flooding] Air Pollution NPPF para 181 talks about improving Air Quality management plans and Clean Air Zones. Given the likely increase in traffic expected due to potentially over 1000 new cars from the development proposed of 600 new houses, it is difficult to see these as being compatible; nitrogen oxides and particulate emissions are likely to increase, especially due to queues at peak traffic times in West Vale, leading to a decline in air quality in the village, including around the local primary school. Infrastructure NPPF 102 requires consideration of avoidance and mitigation of adverse effects of impact of any changes to transport infrastructure. With the building of 600 new houses along Saddleworth Road, the pressure on West Vale junctions is set to increase by over 100%; currently, a journey yesterday to Elland and back in the early afternoon involved over twenty minutes sat in queues for the traffic lights with Stainland Road. Improvements in the wider area, including a railway station at Elland and new M62 junction, will do nothing to alleviate the local situation in West Vale and will actually exacerbate the problem as many of the people relocating here will have to travel to the local cities for work. The inadequate nature of the local public transport means that the vast majority of commuters have to use private cars for journeys; as there are no local amenities within 500m of most of the new developments, this will also increase local journeys into West Vale (as outside the -“edge of centre” radius), putting further pressure on parking in the village. The roads off Saddleworth Road are very narrow and already heavily used ; I have witnessed accidents due to the lack of space, one involving the local small bus and another with a van. With the introduction of construction traffic, travelling around the area will become more difficult ; the proposed mini-roundabout is unlikely to have any effect unless the roads can be widened. Most of Scar Bottom Lane is unadopted and pot-holed, yet still used along with Brian Royd Lane, by some locals to cut through to Rochdale Road - this will be made a lot worse with the developments along Saddleworth Road if built, as drivers seek ways to avoid the congestion in West Vale.

Lack of capacity in the local schools and health centre/dentist provision is also of great concern to many of the local residents. There is no evidence of increased provision of school places (para 94), or shops close to the new developments. The new developments would lead to a loss of identity in the current village community, as well as a removal of green areas for social recreation. Ironically, residents would have to take more journeys to reach an area for walking or to enjoy wildlife etc.!

Do you consider that the plan complies with the Duty to Co-operate?:

Duty to Co-operate Reason:

I feel unable state whether the local Plan complies with the Duty to co-operate

Suggested Modifications:

Comments:

Additional Evidence Link:

Comment ID **HRU550**

Site ref (if applicable): **LP0952**

Person ID: **1241732**

Name: **Mr. Cory Greidanus**

Organisation:

Agent ID:

Name:

Organisation:

Do you consider the plan to be Legally Compliant?: **No**

Legal Compliance Reason:

Poor Public notification and little time allowed for proper consultation. This Portal is very confusing and hugely difficult to navigate. Many people will be unable to put forward their views on the plans. Many people wont even be able to find Where to complain, because these sites in West Vale and Greetland have been listed under Elland. West Vale and Greetland are not in Elland. Section 1.2 of the Calderdale SCI 2015 calls for Clarity. -“We need to be very clear about what we are asking people and we must be sure that people understand what will happen as a result of this engagement. This includes being clear about what decisions have been made, what have not, and who will make the final decision.” This clarity does not exist, people are confused about the whole process. Disproportionate growth of 33.8% to the Greetland Community which contradicts Greenbelt policy to restrict urban sprawl. Within the Potential Sites considered and rejected report CC37, LP1028, which is also in Greenbelt, had a planned site of 122 dwellings removed. One of the reasons stated is that it would give a "disproportionate increase to Barkisland village". The increase based on the same dataset above would have been 16.6%. If Barkisland can be pulled out of its grouping with Ripponden and Rishworth then we suggest that Greetland can be distinguished from Elland. If 16.6% is disproportionate to one village why is 22.4% or even 33.8%% not disproportionate to another?

Do you consider the plan to be Sound?: **No**

Sound Reason:

Main points of Objection : Flooding Risk Loss of large area of Green Belt and Wildlife Corridor Current Chronic Congestion in West Vale, and the effect on Air Quality Lack of Infrastructure Flooding Risk The risk of flooding to the Greetland and West Vale areas, as well as further downstream into Elland, are of paramount importance in my objections to development on this site. I have lived adjacent to the site in