

# Your Area, Your Plan

A new plan for jobs, homes, shops and green spaces

Core Strategy Preferred Options

Autumn 2012

## Feedback





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This feedback document provides a summary of the comments made during the Core Strategy Preferred Options Consultation which took place between 19 October 2012 and 14 December 2012, together with the actions that the Council intends to take in response to those comments. The consultation represented an early draft of the Core Strategy and therefore took the form of a document containing strategic policies on a wide range of issues.

Please Note : The full text of all comments made and the Council's considered response to each can be found at on the Council's website:

[http://calderdale.objective.co.uk/portal/planning\\_services/cspo/cspo](http://calderdale.objective.co.uk/portal/planning_services/cspo/cspo)

The document is structured in the same way as the main consultation document.

### **View of Halifax from Beacon Hill**



# 4 Awareness Raising


Raising awareness of the consultation is important to ensure the public become engaged in the consultation process. The methods used to raise awareness for the Preferred Options consultation included articles in the press, posters, letters, e-mails, formal press notices, Calderdale Council website and discussions with various groups.

**Table 1 Awareness raising methods**

Method	Details	Location
Press releases	Press releases and information were sent out through the Council's Corporate Communications Officer	Halifax Courier, Todmorden News, Brighouse Echo and Hebden Bridge Times all ran articles on the consultation.
Press adverts	Adverts were placed in the press announcing the consultation period, where to view documents and details of public information sessions.	Adverts were placed in Halifax Courier, Hebden Bridge Times, Brighouse Echo, Todmorden News, Valley Life Magazine and Huddersfield Examiner
Posters	Posters informing people of the consultation and how to get involved.	Posters were placed in: <ul style="list-style-type: none"> <li>● Planning reception</li> <li>● Libraries</li> <li>● Customer 1<sup>st</sup></li> <li>● Other Council buildings as appropriate</li> </ul>
Letters/e-mails	Letters and e-mails were sent informing people of the consultation.	Letters or emails were sent to: <ul style="list-style-type: none"> <li>● All 1900+ registered on the LDF database.</li> <li>● Letters sent through the schools pack</li> </ul>
Schools	Letters sent to all head teachers through schools pack and also separately by the Children and Young People's Voice and Influence Team.	All Calderdale schools
Calderdale website	Information provided on main page of Calderdale web-site	Web-site
Other websites	Links provided to the Council website	Calderdale and Kirklees Manufacturing Alliance  Calderdale Forward
E-Call	Council-wide email to provide staff and Councillors with a link to the consultation material and how to get involved. Occurred over several weeks.	Council email system
Leaflets	Summary leaflets	Leaflets were placed in: <ul style="list-style-type: none"> <li>● Planning reception</li> <li>● Libraries</li> <li>● Customer 1<sup>st</sup></li> <li>● Other Council buildings as appropriate</li> </ul>
Flyers	Information on the plan created by the North & East Neighbourhood Team.	North & East Area

Method	Details	Location
Ward Forums	Item on ward forums to sign-post the public to the consultation.	Ward forum meetings
Councillor Briefing Sessions	Two briefing sessions were held for Calderdale Councillors to inform members about the consultation	Calderdale MBC Councillors
Parish and Town Councils	Letters sent to all Parish and Town Councils informing them of the consultation.	Calderdale Parish and Town Councils
Calderdale Disability Partnership	Briefing to the partnership on 23rd October 2012	Calderdale Disability Partnership

### Core Strategy consultation poster




**Would you like to help plan the future of your town or village?**

**Calderdale Local Plan**  
12pm 19th October 2012 to 5pm 14th December 2012  
The Council are putting together a new plan for new jobs, homes, shops and green areas and need your views.

**Public events**  
(for times and venue visit: [www.calderdale.gov.uk](http://www.calderdale.gov.uk))

- Brighouse - Thursday 25th October
- Northowram - Tuesday 30th October
- Sowerby Bridge - Thursday 1st November
- Elland - Wednesday 7th November
- Todmorden - Tuesday 20th November
- Mytholmroyd - Thursday 22nd November
- Halifax - Monday 26th November
- Ripponden - Thursday 29th November
- Hebden Bridge - Tuesday 4th December



To find out more go online: [www.calderdale.gov.uk](http://www.calderdale.gov.uk) or visit your local library, customer first office or Planning reception, 2nd floor, Northgate House, Halifax.

**CALDERDALE LOCAL PLAN**

# 6 Consultation Methods

A wide variety of techniques were used working in partnership with other Council services including the Children and Young People's Voice and Influence Team as well as various groups and forums. The methods included on-line and hard copy consultation documents, summary leaflets, market stalls, drop-in sessions and presentations.

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The consultation documents generated 1,120 direct comments from 194 individuals, agents, groups or organisations. These comments were made either on-line, by e-mail or by letter.

**Table 2 Comments on the documents**

Document	Total Comments	Consultees
Core Strategy Preferred Options	1120	194
Reasons for Policies	14	8
Sustainability Appraisal	21	4

Over 495 individuals, groups and organisations attended various events that were arranged during the consultation period.

**Table 3 Methods of consultation used**

Event	Method	Date	No. of attendees
Disability Partnership Calderdale	Presentation and discussion	23/10/12	25
Brighouse	Drop-in, presentation and discussion	25/10/12	34
Park Ward Stakeholders	Presentation and discussion	29/10/12	12
Northowram	Drop-in, presentation and discussion	30/10/12	20
Halifax Stall (11am-2pm)	Drop-in	31/10/12	49
Sowerby Bridge	Drop-in, presentation and discussion	01/11/12	9
Elland	Drop-in, presentation and discussion	07/11/12	47
Todmorden	Drop-in, presentation and discussion	20/11/12	25
Todmorden Town Council	Presentation and discussion	21/11/12	Not recorded
Mytholmroyd	Drop-in and Luddenden Ward Forum	22/11/12	15
Halifax	Drop-in, presentation and discussion	26/11/12	22
North Halifax	Drop-in, presentation and discussion	27/11/12	41
Ripponden	Drop-in, presentation and discussion	29/11/12	27
Brighouse	Presentation and discussion	03/12/12	76
Hebden Bridge	Drop-in and Calder Ward Forum	04/12/12	58
Children and Young People's events	Group discussions	Various	35



**Document Section: Whole Document****Nature of Response**

General comment 5  
 Support 10  
 Support with conditions  
 Objections 11

**ID and Name:** PO54 Merrick; PO46 Greenwood; PO196 Homes & Communities Agency; PO180 Wells; PO497 Lambert; PO199 White; PO509 Spivey; PO583 Natural England; PO852 Friends Of The Earth (Calderdale); PO737 Manchester Airport plc; PO810, PO796 David Wilson Homes; PO797, PO812 Barratt Homes; PO815 Thornhill Estates; PO721 HTL Properties; PO717 Oldham MBC; PO830 Cockburn; PO851 Sport England; PO976 Topping; PO1010 Noremberg; PO1007 Dominiak; PO1008 Traviss; PO1018 Gaunt; PO1022 Cummings; PO1023 Mortimer

**Summary of comments**

Several comments of support received making the following points:

- The vision for Calderdale is supported;
- Acknowledgement of the key links and associated benefits that Calderdale provides between the Leeds City Region and Greater Manchester through the M62 corridor and the Trans-Pennine rail line is welcomed;
- The Core Strategy contains strong policies addressing environmental issues and provides comprehensive and useful background information addressing the specific characteristics of the borough;
- The level of job creation and housing growth, to include affordable homes, proposed in the Core Strategy is welcomed;
- The range of preferred options and policies proposed by the Council is supported; and
- The plan and its proposals are soundly based on the most up to date evidence and is positively planned to encourage sustainable development.

Several objections received making the following points:

- The plan and its proposals are based on outdated and discredited assumptions. Particular mention is made of the Open Space Sports and Recreation Study and the Playing Pitch Strategy;
- Proposals will result in the loss of trees and fields;
- Levels of proposed growth appear to be a fait accompli;
- A lack of provision of safeguarded land to ensure the identified need for new housing and employment can be met throughout the plan period and beyond, without the need for a further Green Belt review;
- Proposals will result in the loss of Green Belt;
- Existing infrastructure is insufficient to deal with the growth proposed in the plan;
- Lack of consultation;
- The positive national growth focus has not been carried forward into the Core Strategy; and
- Care must be taken so that proposed growth does not prevent the achievement of the district's vision due to embedded tensions between development and environmental issues.

**Actions**

- The Council will consider whether there is a need to include reference to safeguarded land within Core Strategy policies. The allocation of safeguarded land will be considered within the Land Allocations document.
- The Council are actively trying to reduce development within the Green Belt by identifying sites within urban areas. However, the Council must plan for its development needs over the plan period and ensure it makes sufficient land available to accommodate this need.
- The Council are working with infrastructure providers and have developed an Infrastructure Delivery Plan (IDP) which will co-ordinate infrastructure delivery in Calderdale and identify any future funding gaps. To assist in overcoming any anticipated funding gap the Council are considering the introduction of a Community Infrastructure Levy which would be chargeable against new development in Calderdale to overcome infrastructure issues.

# 8 Whole Document

- The Council widely advertised the consultation through the local press, web site, facebook, twitter, posters in Council buildings such as libraries and emails/ letters to interested parties. In addition 15 meetings were held across the district over the 8 week consultation period.
- The National Planning Policy Framework makes it clear that the Council must accommodate its objectively assessed development needs (including housing and employment) for the plan period. These objectively assessed needs have been used to identify the requirements in Calderdale.
- The Council is currently updating its Playing Pitch Strategy and Open Space, Sports and Recreation Study. The Core Strategy has been developed using an up to date evidence base which will continue to be updated as required.
- The plan aims to meet the objectively assessed needs for development identified in the evidence base, and in line with the requirements in the NPPF and this was the primary approach used in scenario testing. The Council's preferred option for growth, and policies put forward, represent a balance between meeting the needs of the district and minimising environmental impact. However further work will be undertaken to investigate the potential for assessment against carbon reduction, prior to the Publication version of the Core Strategy being produced.

## Document Section: Chapter 1 - all comments

### Nature of Response

General comment  
Support  
Support with conditions 1  
Objections 2

**ID and Name:** PO36 Cockroft; PO353 Mattok; PO344 Armstrong

### Summary of comments

A general objection was received to the limited nature of the extent and scope of the consultation process for the Core Strategy Preferred Options. Other comments/objections received against Section 1 (which set out the general purpose of the document) included more specific issues such as:

- The forecast number of jobs growth in the plan is optimistic;
- The micro-economic and retail assumptions in the plan are wrong; and
- The Core Strategy should be targeted on achieving as near to 100% of planned development from brownfield sites and the Green Belt should be protected at all costs.

### Actions

The comments regarding consultation are noted and efforts will be made to ensure wider dissemination of information and consultation for the publication version of the plan. To take account of the latest economic data the employment figures will be revised, and the Regional Econometric Model (REM) will be re-run, prior to Publication of the Core Strategy. The identification of a greater number of potential brownfield sites, to minimise the necessity to use both greenfield and Green Belt land, will be undertaken through the Land Allocations Document.

## Document Section: Chapter 2 overarching comments and Paragraphs 2.1 to 2.12

### Nature of Response

General comment 2  
Support 2  
Support with conditions 3  
Objections

**ID and Name:** PO60 English Heritage; PO294 Lane; PO345, PO347 Armstrong; PO583, PO584 Natural England; PO294 DPP; PO853 Friends Of The Earth (Calderdale); PO1103 Environment Agency

### Summary of comments

There have been a range of comments made against this section. There is support for the role that the historic environment has in the distinctive character of the district; together with the role of the M62; it is noted that environmental issues are addressed but further revisions are needed about SSSIs and other protected areas; issues about flood risk and the way it is described; issues around the evidence for housing growth.

**Actions :** Some amendments to the paragraphs will be made to reflect the comments particularly those of Natural England and the Environment Agency.

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## Proposed Settlement Hierarchy

### Document Section: Paragraphs 2.13 to 2.17 (including Table 2.1 and Map 2.3)

### Nature of Response

General comment 2  
Support 1  
Support with conditions 1  
Objections 2

**ID and Name:** PO763 B N P Paribas Real Estate; PO339, PO258 Tattersall; PO529 Shibden Valley Society; PO348 Armstrong; PO310 Procter

### Summary of comments

There have been a range of comments made about the settlement hierarchy which some respondents state should be revised in order to more properly reflect the current role, facilities and services provided.

### Actions

Further Action will be required to reflect the comments made as work is undertaken in preparing the Publication version of the Core Strategy. The Council has recognised that the Settlement Hierarchy produced in 2008, is now out of date, and will consider how best to revise this as part of the plan preparation process, taking account of the comments and changes that have occurred since 2008.

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## Travel

### Document Section: Paragraphs 2.30 to 2.37 (including Table 2.3)

### Nature of Response

General comment 2  
Support 1  
Support with conditions 3  
Objections

**ID and Name:** PO194, PO195 Lawton; PO122, PO123, PO124 Highways Agency; PO309 Tattersall

## Summary of comments

A range of comments have been made reflecting the assessment of the M62 and congestion within Brighouse arising from closure of the motorway; the desirability of increasing development in Brighouse; issues relating to congestion hot spots such as Salterhebble; improving public transport.

## Actions

- The Council will continue to work with the Highways Agency to minimise the impacts on the SRN and deliver solutions to current and future capacity problems. The description of the issues may be revised in the light of the comments made.
- The current congestion issues are noted, the Council are working closely with infrastructure providers to identify both solutions and funding mechanisms to assist in overcoming some of the congestion issues.
- There is need to show how the plan is going to deal with issues arising from congestion, public transport and access to railway stations. This will be developed as the publication version of the plan is prepared.
- There is a need to ensure consistency throughout the document. The table or text will be amended to reflect the correct position for congestion and air quality matters in later iterations of the Core Strategy.

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## Housing Stock

**Document Section: Paragraphs 2.45 to 2.52 (including Table 2.8)**

### Nature of Response

General comment 1  
Support  
Support with conditions 1  
Objections

**ID and Name:** PO349 Armstrong; PO512 Tattersall

## Summary of comments

There is a small stock of one and two bedroom properties available... Utilising old mills and large premises could be a solution for the property owner and the Council to fulfil it's obligation,... Additionally Government predictions indicate a possible increase in the over 75 population of 12,000 by 2033. We recommend Retirement/Nursing Homes be included within this table.

## Actions

- Issues relating to the type/size of dwellings required are addressed in the Core Strategy whilst bringing forward old mill sites for new housing development will be addressed within the Land Allocations & Designations DPD.
  - There is a need to further describe and expand upon the issues arising from an ageing population, both within the Spatial Vision and within the Housing specific sections.
-

## National Framework

### Document Section: Paragraphs 3.1 to 3.9

#### Nature of Response

General comment 12  
Support  
Support with conditions  
Objections

**Name and ID:** PO293 DPP; PO798, PO767, PO772 David Wilson Homes; PO774, PO768, PO802 Barratt Homes; PO758 Thornhill Estates; PO650 HTL Properties; PO1104, PO1105 Environment Agency; PO311 Procter

#### Summary of comments

Most of these comments quote directly from the National Planning Policy Framework (NPPF) rather than making specific points about the policy context. There is some concern expressed about protection of the Green Belt.

**Actions :** None arising directly from these comments. Compliance with the NPPF is a key part of the preparation and "soundness" of the plan.

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## Regional Policy

### Document Section: Paragraphs 3.10 to 3.29 (including Policy RS-YH 6 and Table 2.3)

#### Nature of Response

General comment 9  
Support 2  
Support with conditions 2  
Objections 2

**Name and ID:** PO125 Highways Agency; PO312, PO314 Procter; PO530 Shibden Valley Society; PO640, PO622 Directions Planning Consultancy; PO651 HTL Properties; PO670, PO702 Redrow Homes; PO808 David Wilson Homes; PO809 Barratt Homes; PO759 Thornhill Estates; PO855 Friends Of The Earth (Calderdale); PO956 Gregory Gray Associates; PO1085 Kirklees MC;

#### Summary of comments

These comments raise a broad range of issues. There is concern about the Duty to Cooperate and how Calderdale will work with Kirklees; support for the inclusion of policies from the RSS in the Local Plan; a need to protect and safeguard rural communities; and general support for the Vision, but concern about how this is translated into the detailed plans and proposals. There is a need to specify the carbon reduction target in the vision.

#### Actions

Further work will be undertaken within the Core Strategy and as part of the Duty to Cooperate to address these concerns.

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**Document Section: Vision - all comments****Nature of Response**

General comment 3  
Support 6  
Support with conditions 3  
Objections 6

**Name and ID:** PO61 English Heritage; PO126 Highways Agency; PO197 Lawton; PO230, PO232 Clifton Action Group; PO263 WYAAS; PO315 Procter; PO351 Tattersall; PO443 Yorkshire Wildlife Trust; PO531 Shibden Valley Society; PO585 Natural England; PO655 HTL Properties; PO760 Thornhill Estates; PO820 Barratt Homes; PO822 David Wilson Homes; PO857 Friends of The Earth (Calderdale); PO919 Whitwam; PO1106 Environment Agency;

**Summary of comments**

There was some strong support for the idea of a narrative vision, but also condemnation of the approach. Some representations want more focus on quantified long-term directions and outcomes whilst others focused on particular aspects of the vision and raised the issue of balancing development with protecting the environment. There are detailed comments within some representations which it is not possible to summarise adequately here. Please see the on-line Objective Consultation Portal for details.

**Actions**

Further consideration of the Vision and how it is expressed will be undertaken as the publication version of the Core Strategy is prepared, reflecting specific points raised by the representations.

---

**Document Section: Chapter 5 - overarching comments****Nature of Response**

General comment  
Support 1  
Support with conditions 2  
Objections

**ID and Name:** PO858 Friends Of The Earth (Calderdale); PO532 Shibden Valley Society; PO925 Barton Willmore Llp for Whitwam

**Summary of comments**

General support for the objectives, however a few comments suggested recommendations which were:

- Support these (although we would suggest that they are all expressed in the same formulation, beginning 'To [do something or other]) except in the following instances: SO1, SO2, SO3, SO4, SO7, SO10; and
- The objectives, particularly SO4: Housing, must be based upon a robust evidence base.

**Actions**

- The Council will consider amending the wording of the objectives.

**SO1: Sustainable Development****Document Section: Paragraphs 5.3 - 5.4****Nature of Response**

General comment 1  
Support 5  
Support with conditions  
Objections

**ID and Name:** PO266 WYAAS; PO384 Philip S. Ryley & Co. LLP; PO862 Friends of The Earth (Calderdale); PO373 Crosslee plc; PO1107 Environment Agency

**Summary of comments**

- Support for the recognition that the plan will need to protect and enhance Calderdale's natural, built and historic environment;
- Objective should recognise the economic and environmental benefits that rural development can bring; and
- The strategic objective should be amended to ensure a wider remit.

**Actions**

- Consider amending wording of objective.

**SO2: Climate Change****Document Section: Paragraph 5.11****Nature of Response**

General comment 1  
Support 2



Support with conditions  
Objections

**ID and Name:** PO865 Friends of The Earth (Calderdale); PO587 Natural England; PO1108 Environment Agency

### Summary of comments

- Support for the references to the protection and enhancement of the environment;
- Welcome the acknowledgement that the Local Plan should take account of water supply when considering adaption to climate change, as well as flood risk and changes to biodiversity; and
- The Local Plan cannot 'address the causes of climate change' which are much wider than local, but it can help 'reduce Calderdale's climate change emissions'.

### Actions

- Consider amendment to wording to reflect the impacts and influences the Local Plan can have.

---

## SO3: Economy and Enterprise

**Document Section:** Paragraphs 5.13 - 5.14

### Nature of Response

General comment 1  
Support 2  
Support with conditions 1  
Objections

**ID and Name:** PO316 Procter; PO871 Friends of The Earth (Calderdale); PO374 Crosslee plc; PO724 Tesco Stores Ltd

### Summary of comments

The suggestion was made to replace the word 'sustainable' in the Strategic Objective text with 'low-carbon' to present a clearer sense of direction and to better align the Calderdale Local Plan with the Leeds City Region priorities. Otherwise relevant comments gave general support to the proposed text.

### Actions

Amend wording to reflect comments.

---

## SO4: Housing

**Document Section:** Paragraph 5.17

### Nature of Response

General comment 1  
Support 2  
Support with conditions  
Objections 2

**ID and Name:** PO873 Friends of The Earth (Calderdale); PO295 DPP; PO375 Crosslee plc; PO761 Thornhill Estates; PO659 HTL Properties

### Summary of comments

Whilst there was support for this objective some representations wished to see wording amendments:

- To be consistent with paragraph 111 of the NPPF SO4 should say 'encourage' rather than 'maximise' the development of brownfield land;
- Request for the Inclusion of reference to 'energy efficient' dwellings.

5

**Actions**

Further consideration to determine the precise wording and emphasis to elements of SO4:

- Emphasis attached to brownfield sites and/or further explanation as to the Plan's approach;
- Whether to include reference to 'energy efficient' dwellings in SO4.

**SO5: Green Infrastructure and the Natural Environment****Document Section: Paragraph 5.21****Nature of Response**

General comment  
Support  
Support with conditions 1  
Objections 1

**ID and Name:** PO1109 Environment Agency; PO586 Natural England

**Summary of comments**

- Support was expressed for the inclusion of the Green Infrastructure strategic objective, however the wording was not felt to be strong enough and the following recommendations were made:
  - Protection and enhancement of areas of biodiversity importance should be mentioned;
  - Protection and enhancement of the District's landscape character and local distinctiveness should be mentioned;
- The Core Strategy should include a policy which provides a context for the protection and enhancement of designated nature conservation sites; affords protection for locally designated sites and areas of importance for the natural environment; refers to local distinctiveness; and sets a positive framework for the protection and enhancement of the landscape character of the district, including the requirement of new development to respect local distinctiveness; and
- The Core Strategy would benefit from separate objectives to promote all aspects of the natural environment, it should clearly set out the Council's intentions for the natural environment and should provide an appropriate framework for lower tier documents which follow the Core Strategy.

**Actions**

- The Council should consider making the Natural Environment a separate objective to that of Green Infrastructure;
- The Council should consider including further contextual information on the importance of the natural environment and landscape in Calderdale and also consider alternative wording to Strategic Objective 5 and other relevant policies to cover the points raised.

**SO6: Historic Environment and Design****Document Section: Paragraph 5.26****Nature of Response**

General comment  
Support 1  
Support with conditions  
Objections 1

**ID and Name:** PO62 English Heritage; PO267 WYAAS

## Summary of comments

Strategic Objective should reference the need to 'enhance' the historic environment, and there is concern that "conserving the District's heritage assets" will be at odds with "maximising their contribution to the wider economic and social objectives of the plan".

## Actions

Amend wording to address comments.

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## SO7: Transport

**Document Section:** Paragraph 5.28

## Nature of Response

General comment 1  
Support 2  
Support with conditions 1  
Objections

**ID and Name:** PO63 English Heritage; PO127 Highways Agency; PO874 Friends Of The Earth (Calderdale); PO588 Natural England

## Summary of comments

- Support the proposed Strategic Objective for Transport particularly the reference to minimising the harmful effects which transportation can have upon the environment and the communities of the plan area;
- Amend wording to include reference to reducing carbon emissions;
- Support references to the protection and enhancement of the environment; and
- Highways Agency support objective in principle. Need also to reflect need to try to ensure that employment and housing development go forward in parallel in a balanced way so that there is no adverse impact in the form of an increase in net out-commuting.

## Actions

- Amend Objective 5 to include reference to reducing carbon emissions.
- 

## SO8: Communities and Narrowing the Gap

**Document Section:** Paragraph 5.31

## Nature of Response

General comment  
Support  
Support with conditions  
Objections

**ID and Name:**

**Summary of comments** No comments made

**Actions** No further action

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**SO9: Minerals****Document Section: Paragraph 5.36**

5

**Nature of Response**

General comment  
 Support 3  
 Support with conditions  
 Objections

**ID and Name:** PO64 English Heritage; PO589 Natural England; PO1110 Environment Agency**Summary of comments**

- Support for the inclusion of a Strategic Objective to ensure a sustainable supply of minerals from the plan area;
- Welcome references to the protection and enhancement of the environment.

**Actions** No further action**SO10: Waste****Document Section: Paragraph 5.40****Nature of Response**

General comment 1  
 Support 1  
 Support with conditions 2  
 Objections 1

**ID and Name:** PO65 English Heritage; PO128 Highways Agency; PO875 Friends of The Earth (Calderdale); PO590 Natural England; PO1111 Environment Agency**Summary of comments**

- The plan, as a whole, should be seeking to reduce the amounts of construction waste that is generated by encouraging, in the first instance, the reuse or adaptation of existing buildings;
- Support for minimising the amount of waste sent to landfill and minimising the transport impact of waste disposal;
- Suggest minor amendments to the wording in order to reflect potential adverse effects that waste development can have on the landscape, biodiversity (including the water environment) and geodiversity, as well as more emphasis on reuse and recycling;
- Clarification requested as to the definition of 'sustainable location'.

**Actions**

- Consider amending wording of objective in order to establish a wider remit.

## Document Section: Chapter 6 - overarching comments

### Nature of Response

General comment 2  
 Support  
 Support with conditions 1  
 Objections 1

**ID and Name:** PO185 Wells; PO876 Friends of The Earth (Calderdale); PO533 Shibden Valley Society; PO1097 Environment Agency

### Summary of comments

A wide range of comments were generally made against this section. These included:

- No reference to wind turbines;
- Consideration work has been completed well but greater need to consider land outside of the Green Belt when drawing up the spatial option;
- General agreement with the approach being taken, however recommend reference to Northowram and Shelf as a growth location be removed; and
- Support the use of brownfield sites for new development over greenbelt land but it should be recognised that brownfield sites can be important habitats in heavily built up urban areas.

### Actions

- Work on wind turbines will be reflected in the final version of the Core Strategy;
- Further work will be undertaken to ensure adequate demonstration of publicly owned and brownfield land being brought into the equation to help reduce potential pressures on Green Belt; and
- The role and status of Northowram and Shelf will be considered further during the preparation of the draft plan.

## Consideration of Spatial Options

**Document Sections: Paragraphs 6.1 to 6.5 & Preferred Spatial Option for the Distribution of Development**

### Nature of Response

General comment 3  
 Support 3  
 Support with conditions 1  
 Objections 4

**ID and Name:** PO129 Highways Agency; PO202 Todmorden Town Council; PO260 Marshall; PO957 Gregory Gray Associates; PO296, PO297 DPP; PO317 Procter; PO174 Bottomley; PO208 Lawton; PO376 Crosslee plc; PO878 Friends of The Earth (Calderdale)

### Summary of comments

The discussion and analysis section concerning the four options consulted upon at Refined Issues and Options stage together with the Preferred Spatial Option raised a number of comments including objections. These were:

- Modelling of the four options by the Highways Agency notes that there was relatively little difference between the options in terms of traffic impact on the Strategic Road Network (SRN), although those weighting more in eastern areas did result in a greater increase in traffic impact;
- Welcome the enhanced role of Todmorden as listed in para 6.1 (Options considered at Refined Issues and Options subsection 2) provided that its status is that of 'Local Town' and not as 'Principal Town' which would be unsustainable. In addition to Walsden, Portsmouth should be listed as 'Local Centre' rather than 'Neighbourhood Centre' giving options for expansion of shopping and services, provided these are limited to small, independent retail enterprises;

- We fully support this approach, as it demonstrates the most sustainable option for growth. The locations support extensive rail and motorway links;
- Object to assertion that brownfield sites should be developed first as this is considered contrary to the NPPF;
- We welcome the recognition that the eastern parts of Calderdale District has the capacity for housing development whereas the western areas do not have a similar level of capacity as they are more environmentally sensitive with less services and facilities and limited prospects for economic growth;
- It is of concern that the development in Halifax would require the building of residential properties on Green belt in North Halifax;
- The issues of congestion and over-development without sufficient infrastructure need to be revisited; and
- Object to an approach to the distribution of growth that is influenced by proximity to the M62 and the strategic highway network, or the possibility of additional local highway infrastructure because this is contrary to the carbon reduction policies of this Local Plan and the Council's prior climate change strategy and target.

## Actions

The following actions will be undertaken to address the comments:

- The Council will continue to work with the Highways Agency regarding traffic impacts upon the SRN as it works towards the Publication version;
- The relationship between brownfield and greenfield land in respect of housing is addressed under specific representations to that part of the Plan;
- The Council are actively trying to minimise the release of Green Belt by trying to identify as many development opportunities as possible which are not within the current Green Belt; and
- The Infrastructure Delivery Plan (IDP) is addressing the infrastructure issues and will help the understanding of the implications of development upon communities and areas within Calderdale.

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## Document Sections: Policy CP1: Distribution of Growth (including Tables 6.1 & 6.2 and Map 6.1)

### Nature of Response

General comment 6  
Support 15  
Support with conditions 7  
Objections 11

**ID and Name:** PO30 Greenwood; PO32 Fraser; PO130 Highways Agency; PO184 Wells; PO879 Friends Of The Earth (Calderdale); PO565 Shibden Valley Society; PO359 METRO; PO298 DPP; PO318 Procter; PO377 Crosslee plc; PO388 Philip S. Ryley & Co. LLP; PO831 David Wilson Homes; PO828 Barratt Homes; PO744 Tesco Stores Ltd; PO674 Redrow Homes (Yorkshire) Ltd; PO614 Clugston Developments; PO1074, PO1076, PO1082, PO1084, PO1075 Kirklees MC; PO777 Thornhill Estates; PO1025 Anderson; PO623, PO624 Directions Planning Consultancy; PO958, PO973 Gregory Gray Associates; PO574 Coal Pension Properties; PO688 HTL Properties; PO687 Midgley; PO577 Lynn; PO1052 Environment Agency; PO591 Natural England; PO729 Lancashire County Council; PO1066 B N P Paribas Real Estate; PO773 Roger Lee Planning Ltd; PO791 CP Group Limited; PO931 Whitwam; PO499 Coy

### Summary of comments

Policy CP1 received diverse comments both in favour and against the proposed distribution of growth. The comments are summarised below:

- Halifax is the most important centre in the district and there is a need to concentrate new growth here, in order to enable the commercial expansion and regeneration of the town centre;
- Support the principles of a hierarchical approach to development which focuses growth according to the settlement hierarchy;

- Development should not be limited to just one part of the district and the policy should generally encourage development across the whole of Calderdale. It is essential that the Core Strategy delivers new homes across the district, not just in a single preferred approach location;
- This policy will create an imbalance, development needs an even spread across the borough, jobs, housing and retail etc. all need to be increased and should be 'pepper potted' into communities not in a lump in the Eastern band;
- Concentrating on a small number of areas puts pressure on local services and may mean that the original intended benefits are not realised;
- More housing development required in Elland to balance with the employment suggested in the plan;
- Support policy CP1 and consider that the distribution of housing growth, as proposed in this policy, is soundly based and justified and will effectively deliver housing;
- Amend: after the second and third paragraphs on Land Allocations and Infrastructure, include a fourth paragraph on 'Environmental Impacts' that identifies the intention to undertake an appropriate set of actions intended to minimise the environmental and biodiversity impacts of the proposed distribution;
- Seek deletion of the fifth bullet point in Policy CP 1, which makes explicit reference to Northowram and Shelf;
- It is important that those areas which Calderdale has already defined as separate communities or rural communities do not become mere extensions of the urban centres;
- It is important that sites not currently available for development in Halifax are released for residential development to meet housing needs. Particular importance should be placed on sites with good transport links to Halifax and surrounding major towns and cities;
- The 'potential growth area' of Elland should be extended to include the whole of Elland given that the areas identified on the map are not necessarily the most appropriate areas for development and there are sequentially preferable areas that are currently excluded by the hatched areas on the map;
- With regards the requirement for land allocations, the policy suggests that larger housing sites will include a full range of supporting uses. For the policy to be sound it needs to describe the threshold for 'larger housing sites';
- Further discussion required following Calderdale's completion of its selective green belt review in order to clarify the effect of development proposals on green belt separation between the built-up areas of Kirklees and Calderdale;
- Calderdale has seen a tremendous emphasis on housing in the last 15 years, many on brownfield sites. However the proposed rate of 800 per year is I believe unrealistic without putting a strain on infrastructure schools, health etc.;
- Development of brownfield sites should take account of the impact upon densely populated urban areas where such sites may provide valuable open spaces; and
- The Key Diagram needs to include the Rochdale Canal, Calder & Hebble Navigation and the Halifax Arm to ensure that the Core Strategy is effective and meets the soundness test.

## Actions

The following actions will be undertaken in response to the comments:

- The issue of environmental impacts will be considered, particularly through the Sustainability Appraisal process;
- The Council will refine the growth areas to ensure they provide adequate coverage whilst protecting the identity of individual settlements;
- The Council are actively seeking to increase the number of sites within Halifax and other areas. This will assist in reducing the need for Green Belt release. Whilst the Core Strategy will identify the general areas of growth the sites will be identified through the Land Allocations document;
- The issue of a definition of 'larger housing sites' is noted and needs further consideration, however, this may be included in the Land Allocations document;
- The Council will continue discussions with neighbouring authorities over issues of mutual interest as the plan progresses;
- Infrastructure is a key concern for the plan and more work will be undertaken on this issue through the Infrastructure Delivery Plan (IDP) as the plan develops;

- The Council will need to ensure that appropriate assessments of individual sites are made as part of the Land Allocations document and that the importance of brownfield sites to open space provision within urban areas is taken into account; and
- Amendments to the key diagram to include reference to the Rochdale Canal, Calder & Hebble Navigation and the Halifax Arm as well as the River Calder will be considered prior to the next iteration of the Core Strategy.

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## Scale of Development Proposed - Jobs

**Document Sections: Policy CP2: Employment Floorspace Requirements (including Paragraphs 6.9 & 6.13)**

### Nature of Response

General comment 2  
Support 3  
Support with conditions 1  
Objections 2

**ID and Name:** PO498 Carlton; PO877, PO880 Friends of The Earth (Calderdale); PO252 Mattok; PO378 Crosslee plc; PO849 Thornhill Estates; PO756 HTL Properties; PO1067 B N P Paribas Real Estate

### Summary of comments

A number of comments discussed Policy CP2 which sets out the employment floorspace requirements for the district until 2029. The comments made are briefly summarised below:

- The Employment Land Review (ELR) does not appear to take into consideration the increase of people working from home and the increase of more advanced industrial buildings;
- Concerns that the economic assumptions could be artificially pushing up the housing requirement;
- Include a 'brownfield first' sequential requirement;
- Support for the level of job growth and use of existing RCUDP sites; and
- Requests that either the Local Plan Core Strategy does not identify an additional 20% supply of employment sites above identified needs, or provides flexibility (in Policy TPE2 - see comments under TPE2) to allow for the release of employment sites for alternative uses if it is evident that there is no demand for the re-use of the site for employment uses.

### Actions

The comments are likely to require a number of actions outlined below:

- The ELR will be updated as the plan progresses; and
- The Council are considering amending Policy TPE2 in light of the comments above.

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## Scale of Development Proposed - Retail and Town Centres

**Document Sections: Policy CP3: Provision of Town Centre Floorspace (including Paragraphs 6.15 to 6.17)**

### Nature of Response

General comment 1  
Support 1  
Support with conditions 4  
Objections 2

**ID and Name:** PO253, PO254 Mattok; PO381 Crosslee plc; PO745 Tesco Stores Ltd; PO739 Asda Stores Ltd; PO1081 Kirklees MC; PO578 Coal Pension Properties; PO793 CP Group Limited



## Summary of comments

Although the majority of comments received in relation to Policy CP3: Provision of Town Centre Floorspace were in support, many of these were conditional. A wide range of comments were received in objection, or in relation to potential improvements to the policy wording:

- Current market trends suggest that the assertions regarding new retail floorspace and new jobs are incorrect;
- The range of potential floorspace provision provides uncertainty and means that establishing likely impacts on neighbouring districts and centres is difficult;
- Explicit reference should be made to the fact that the need for additional floorspace will be subject to regular review and therefore may change;
- The balance between 'need' and 'provision' should be clarified;
- Clawback of expenditure must be located sequentially in town centres and acknowledge the role of town centres outside Calderdale;
- Clarification in the policy is required as to the future role of District Centres;
- Additional floorspace that would result, should only come forward if it can compliment existing provision and would not put at risk the vitality and viability of existing facilities in the Town Centre such as the Woolshops Shopping Centre;
- An element of the retail growth identified in the above figures could be accommodated through the redevelopment and reconfiguration of existing sites and premises; and
- Supermarkets have resulted in increasing closures of high street shops - butchers, bakers, etc simply cannot compete.

## Actions

- Re-run REM model in the context of retail jobs;
- Review Retail Needs Assessment in light of latest population and expenditure forecasts;
- Consider out-of-centre retail locations and their inclusion within the formal retail hierarchy; and
- Consider amending wording of Policy CP3 in line with comments received.

## Scale of Development Proposed - Housing

**Document Section: Paragraph 6.18**

### Nature of Response

General comment 4  
 Support 2  
 Support with conditions  
 Objections

**ID and Name:** PO775, PO769 David Wilson Homes; PO770, PO794 Barratt Homes; PO1112 Thornhill Estates; PO677 HTL Properties

### Summary of comments

- Support the proposed approach to set the housing requirement above the RSS requirement figure of 670 dwellings per annum to ensure there is sufficient housing to support the planned economic growth; and
- It is considered justifiable based on the recent completions to include a 5% buffer.

## Actions

- The Council intends to ensure that the next SHLAA Review (the first following publication of the NPPF) makes reference to an additional 5% of housing land

## Local Evidence for Housing

Document Section: CP4: Provision of Housing (including Paragraphs 6.19-6.35)

6

### Nature of Response

General comment 4  
Support 6  
Support with conditions 8  
Objections 18

**ID and Name:** PO527 Rossendale BC; PO1077 Kirklees MC; PO757 Green Watch/Residents Group/Road Safety Committee; PO625 Directions Planning Consultancy; PO299 DPP; PO209 Lawton; PO778 Roger Lee Planning Ltd; PO256, PO255 Mattok; PO319 Procter; PO884, PO885, PO882, PO888 Friends of The Earth (Calderdale); PO680 Redrow Homes (Yorkshire) Ltd; PO269 WYAAS; PO805, PO834 David Wilson Homes; PO806, PO832 Barratt Homes; PO280, PO278 David Storrie Associates; PO764, PO776, PO821 Thornhill Estates; PO727 HTL Properties; PO946, PO943 Whitwam; PO566 Shibden Valley Society; PO667, PO678, PO968, PO966 Gregory Gray Associates; PO714, PO383 Crosslee plc; PO1068 B N P Paribas Real Estate

### Summary of comments

A range of comments were received relating to the overall housing requirement figure, the phasing approach and the brownfield target. The views polarised between wishing to see greater levels of housing unconstrained by phasing or prioritising brownfield land to those advocating a more restrained approach, both in view of the current recession and the impact on the district including on its Green Belt .

### Housing Requirement Figure

- How reliable are the projections for housing need given the latest economic data and the forecast that the current recession will last for at least a further five years? Other than in desirable green belt areas there will not be a demand for housing and the current traffic congestion etc will dissuade people from living in the eastern part of the District;
- Strongly support the decision to use a requirement above the RSS figure which would allow for the anticipated economic and population growth in the district;
- Any housing requirement be set as a minimum to allow for added flexibility and growth when the market improves;
- Object to the proposed housing requirement figure of 16,800 dwellings (800 dwellings per annum). Whilst there is some evidence to support the proposed housing requirement figure of 800 dwellings, equally there is evidence to suggest the need for housing within the District will be higher;
- Support the preference for 'a balanced approach' (whereby both housing and economic needs are met) but there remains the question of the extent to which housing supply should be constrained to achieve the optimum sustainable balance between economic, social and environmental outcomes;
- The statement that 'Setting the requirement around 16,800 represents a balanced approach that should not hinder economic growth *whilst minimising any adverse effects on the character of the district* including the features which make it an attractive place in which to live and work ...' cannot truthfully be consistent with the percentage of Green Belt land take required;
- WYAAS supports the statement that heritage assets are one of the factors that mean that Calderdale cannot compensate for under provision of housing in neighbouring Districts;
- Insufficient consideration given to other measures including Government initiatives which may increase the demand for housing;
- No harm would result in identifying sufficient supply to meet objectively assessed needs year on year;
- Housing requirement figure represents an ambitious housing target which is supported as it will assist to encourage a high level of housing growth in Calderdale including allowing for the development of a wider range of housing;
- In view of consecutive years of under-delivery it is essential sufficient land is made available and identified for release to meet housing targets;
- The recession does not reduce levels of demand for new housing, nor does it affect the need to address years of undersupply;

- Rather than pointing to the recession as a reason to provide fewer houses the Core Strategy should incorporate a policy to positively deliver development and to achieve this a balanced portfolio of sites will be required including green and brownfield sites;
- Housing requirement should reflect the upper end of the range in the GVA Report in order to meet objectively assessed housing need;
- Given the number of houses locally on sale over long periods, the number of conversions of large buildings which are under-occupied and the number of people who have had to withdraw their properties from sale due to lack of offers, the figures of likely housing needs seem wildly overestimated in a recession which is forecast to last perhaps for several years, with banks unwilling to lend and full time jobs in both public and private sectors being difficult to hold on to or acquire thus precluding mortgages for many;
- Support the proposals to set a delivery level of 800 new houses per annum with concentration on the use of brownfield land, but in accordance with the policies in the National Planning Policy Framework, not precluding development of greenfield sites in sustainable locations;
- Support the identification of an overall housing target of 16,800 new dwellings to be provided during the plan period to 2029;
- Object to the start date of the plan being 2008; and
- Recommend a continual housing requirement of 1,000 dwellings per annum from 2014 – 2029, which equates to an overall housing requirement of 15,000.

## **Phasing**

- Object to the proposal to split the housing requirement into two phases and to lower the requirement over the period 2008 - 2015;
- Phasing will not deliver the full, objectively assessed needs for market and affordable housing resulting in under delivery in the first part of the Plan period;
- The reliance on delivering above average rates in the second phase may not be achievable;
- The stepped phasing of housing development is the most practical method to meet the assessed housing need up to 2015, whilst allowing for an appropriate provision following this period to meet anticipated growth. It is essential to the delivery and flexibility of the plan that phasing is not restrictive to development and this needs to be made clearer;
- Release of Green Belt sites for housing should be not restricted (i.e. phased) to later in the plan process, as this will instead provide greater flexibility in meeting the housing targets;
- Support the establishment of two phases for housing delivery (with the second set at a higher level);
- Whilst a phased approach to achieving the housing target is supported, it is considered that the policy should also make clear that suitable and sustainable housing sites should also be encouraged to come forward in Phase 1 of the plan period;
- Policy CP4 should be amended to include a requirement for the phased release of sites in order to prevent Green Belt/greenfield sites being released prematurely;
- To reflect the 'realities of delivery', the figure of 600 houses p.a. in Phase 1 be extended until at least 2020, and that thereafter the figure for Phase 2 be reduced to 700 p.a. This would give an overall total of 13,500 new dwellings by 2029. New housing allocations would fall with over 3000 houses not needing to be built in the Green Belt;
- An alternative and pro-active approach would be to plan for a higher housing requirement in the earlier years to enable the Council to show to the market that they are "open for business" by actively aiming to kick start the economy and ensure that housing needs are met;
- The two phases appear to have missed the year 2015 – 2016, therefore phase 2 should be 2015 – 2029 (not 2016 – 2029); and
- Phasing could result in outmigration and continued price pressure.

## **Brownfield**

- The data presented for brownfield development will have included many garden areas that were classed as brownfield sites before the change introduced in PPS3 brought them into the greenfield category;
- Much of the district's housing supply has historically been delivered from gardens. Many garden sites are located in sustainable locations. It would be wrong to downgrade the potential development of these sites because of their greenfield status. Their development should not be thwarted by imposing an unnecessarily high brownfield target;

- Support the statement that the Council considers it remains appropriate to achieve 'as high a proportion of development on brownfield land as possible. A preference for brownfield land is supported by the NPPF and will contribute to sustainable development;
- The RCUDP already has a target of 85% of development being on brownfield and in recent years has exceeded that. Why set a target which at 55% is significantly lower than the current target and is a significant reduction in recent performance?
- Object to the setting of a target so much lower than recent performance given there is no categorical evidence that brownfield land in sufficient quantity is no longer available to maintain past higher proportions of brownfield development;
- In the light of the historic figures, the present availability of derelict sites and empty mills and the stagnant state of the economy in the medium term [resulting in more industrial premises falling vacant], a figure of 55% is unduly pessimistic and should be reconsidered. A higher figure of 60% or more would better meet Sustainability objectives;
- The 55% target does not take account of the windfall opportunities that will arise from the closure of sites such as the Interface site in Shelf. The target should be 100% and only if demand meets or exceeds forecast and if insufficient brownfield sites are available should the target be flexed on an annual basis;
- 55% brownfield target supported and in particular vacant employment sites should be considered for housing development where there is no or little prospect of employment development on the site;
- Target for 55% of new housing to be built on brownfield land overly ambitious;
- Object to the proposed brownfield land target as there is insufficient evidence to support the target proposed and it is evident a target is being proposed specifically as a measure of restraint on greenfield development, when the primary aim should be to ensure sufficiency of supply without prioritising brownfield development over greenfield sites;
- The NPPF does not give priority to the development of previously developed land;
- A target of 55% as set out in Policy CP4 is a realistic aim in contrast to previous policy (i.e. policy H9 of the Replacement Unitary Development Plan) which has served to restrain potential development opportunities that could have assisted in reinvigorating the local economy; and
- No objections to the 55% brownfield target in Policy CP4 provided the overall target is 1,000 per annum.

## Actions

Given the availability of more recent evidence since the Housing Requirements Report was published the intention remains to update it prior to publication of the next iteration of the Plan. This will address many of the concerns raised in the consultation whilst the phasing and brownfield elements of the Plan will also be reviewed having regard to the latest evidence:

- As programmed the Housing Requirements Study is to be updated before the Publication version is published and this will also have the effect of making the base date for the housing requirement figure closer to that of the Plan's adoption date.
- Further work, including Sustainability Appraisal, to be undertaken to consider the balance between economic, social and environmental factors leading to the most appropriate housing figure that will meet the housing needs of the district.
- Consideration to be given to the wording of the text regarding the effect development on Green Belt land may have on the character of the district.
- Phasing to be re-assessed in the light of the most recent evidence, including that of Government initiatives relating to housing provision announced in the March 2013 budget. The boundary between these 2 phases will be re-assessed and clarified during preparation of the Publication version.
- The brownfield target will be refined as the Land Allocations document progresses to reflect the relative proportions of brownfield and greenfield land available to be allocated. In doing so the Council to ensure all suitable brownfield sites are utilised for housing.
- A further policy be added to the Core Strategy addressing the principles that will apply to the phasing of sites in the Land Allocations Document.

## Implications for our Places

**Document Section: Paragraph 6.36**

### Nature of Response

General comment  
Support  
Support with conditions 1  
Objections

**ID and Name:** PO358 METRO

### Summary of comments

- Office locations - Metro agree with the sequential approach but not sure if locating offices on the edge of town centres will achieve the most sustainable locations in terms of public transport accessibility. Where sites are developed out of town the development needs to fund public transport improvements;
- Industry and warehousing – accept sites close to SRN are preferable. These are not always the most accessible sites for public transport but the nature of the business often means employees travel to these uses early morning before peak traffic levels;
- Retail – support the retail hierarchy approach;
- Housing – broadly support the distribution of housing suggested.

### Actions

- The comments made by Metro to be utilised in preparing the Publication version of the Core Strategy.

## Distribution of new Employment

**Document Section: Paragraphs 6.37 to 6.48**

### Nature of Response

General comment 2  
Support 1  
Support with conditions  
Objections 1

**ID and Name:** PO893, PO894 Friends of The Earth (Calderdale); PO131, PO132 Highways Agency

### Summary of comments

- Support for the overall approach to the location of employment uses - towards the main towns;
- Office development should be accommodated outside town centres only in exceptional circumstances;
- Concern over the impact of the RCUDP allocation at Clifton and Ainley Top on the M62;

### Actions

No specific actions have been identified however the Council will continue to work with infrastructure providers regarding the transport concerns identified.

## Distribution of Housing Allocations

Document Section: Paragraph 6.51 to 6.56 including Table 6.12

### Nature of Response

General comment 10  
Support 3  
Support with conditions 1  
Objections 2

**ID and Name:** PO493 Dowson; PO626 Directions Planning Consultancy; PO595 Natural England; PO321 Procter; PO897 Friends of The Earth (Calderdale); PO681 Redrow Homes (Yorkshire) Ltd; PO133 Highways Agency; PO836, PO840, PO930 David Wilson Homes; PO947 Whitwam; PO835, PO927, PO837 Barratt Homes; PO597 Clugston Developments; PO385 Crosslee plc

### Summary of comments

Views polarised between increasing and decreasing the amount of development shown in the distribution:

- Not clear how the higher figure of 10,500 is derived (unlike the 8,500 figure);
- Profoundly disagree with the implications of the distribution given the environmental, biodiversity and local impacts. The argument that only around 1% of Green Belt will be affected is misleading because the distribution between settlements will create very damaging impacts in each localised case;
- When preparing the Land Allocations Document it should be demonstrated that the proposed Green Belt amendments will not have an adverse effect on any designated sites or distinctive/sensitive landscapes;
- Why does Table 6.12 suggest the proportion of brownfield land is lower than the target of 55%?
- Should there be a higher percentage increase in the number of dwellings in Elland compared with Halifax and Brighouse given its poor infrastructure?
- Object to the identified level for 2,100 new dwellings within the wider Brighouse area since this means that the level of housing proposed for Hipperholme is now significantly below that previously identified in the New Growth Point;
- The Plan, via a Policy rather than the supporting text, should clearly set out the proportion of development to be distributed to settlements although not the exact number of dwellings as the targets are not intended to be ceilings;
- Matching housing and employment growth needs to be assessed through the Sustainability Appraisal, particularly in relation to Elland;
- There is little/no explanation of the percentage distribution of the housing requirement to the various settlements;
- An alternative (higher) housing requirement should be adopted and the distribution figures amended both to reflect this higher figure but also other factors;
- Support the need for Green Belt release but this must be properly evidenced
- Highways Agency traffic modelling shows that the distribution of new housing proposed in Table 6.12 has reduced the increase in pressure on M62 Junction 24 (Ainley Top) compared with previous options.

### Actions

Aspects of the distribution will be re-assessed during preparation of the Publication version and in light of the latest evidence including early work on the LAADs document. Specifically:

- Further clarity/signposting to be provided on the reasoning behind the actual level of land allocations required during preparation of the Publication version;
- In preparing the Land Allocations document every attempt to be made to moderate the impacts of new housing allocations including any effects on designated sites or distinctive/sensitive landscapes;
- Further work on increased levels of housing and requisite infrastructure improvements to be progressed through the Infrastructure Delivery Plan;

- The potential of the whole Brighouse area including Hipperholme will be examined, and in particular the opportunities to use brownfield sites and sites within the urban area, during preparation of the Land Allocations document;
- Consideration of the relationship between Table 6.12 and Policy CP1 and their presentation to take place during preparation of the Publication version of the Plan;
- To ensure housing and employment growth compliment one another so far as is possible having regard to the opportunities for each of these land uses;
- Consideration to be given to including greater clarity regarding the distribution of housing within the Publication version or signposting this information; and
- Consideration to be given to including the table of housing distribution at the start of the Areas Section of the Plan.

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## Infrastructure

### Document Section: Paragraph 6.57 & 6.58

#### Nature of Response

General comment 4  
 Support  
 Support with conditions  
 Objections 1

**ID and Name:** PO445 Yorkshire Wildlife Trust; PO899 Friends of The Earth (Calderdale); PO134 Highways Agency; PO570 Luddenden Conservation Society; PO1086 Kirklees MC

#### Summary of comments

The infrastructure section of the proposed growth chapter raised a number of issues relating to infrastructure. These included:

- A need to include Green Infrastructure projects;
- Concern over the lack of road schemes identified;
- Transport issues around the Luddenden Valley;
- The Highways Agency has produced an Infrastructure Study based on new modelling that shows the combined impact on the operation of the Strategic Road network and its junctions with the local primary road network of growth in strategic traffic and additional traffic generated by Core Strategy development proposals across West Yorkshire; and
- The need for continued dialogue with Kirklees regarding infrastructure issues of joint interest.

#### Actions

The Council will continue to work with infrastructure providers and neighbouring authorities as the Core Strategy and Land Allocations documents develop. The Infrastructure Delivery Plan (IDP) is an evolving document which provides background information for the Local Plan on infrastructure. The IDP will be updated as new schemes are developed and new issues are raised. This will include studies such as the work undertaken by the Highways Agency.

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**Document Sections: Policy CP5: Presumption in favour of sustainable development (including overarching comment and Paragraphs 7.1 & 7.2)****Nature of Response**

General comment 6  
 Support 5  
 Support with conditions  
 Objections 1

**ID and Name:** PO1053 Lambert; PO1098 Environment Agency; PO379 DPP; PO261 Marshall; PO257 Mattock; PO691 Midgley; PO900 Friends of The Earth (Calderdale); PO274 WYAAS; PO282 David Storrie Associates; PO949 Whitwam; PO534 Shibden Valley Society; PO389 Crosslee plc

**Summary of comments**

- Scepticism as to what the needs of future generations will be, therefore impossible to know if they had been compromised;
- The presumption in favour of sustainable development must be viewed in light of the continued importance of protecting Green Belt land;
- The policy should properly reflect the importance of protecting and enhancing the historic environment;
- Concern that there is no recognition that the environment is not purely the natural environment but also includes built and historic environment;
- Clarity as to whether the policy would support greenfield development in sustainable locations;
- Support for the presumption in favour of sustainable development;
- Policy for sustainable growth needs 'tight' legislation, through a framework for sustainability that all developments have to work to, if the applications don't meet the requirements they cannot go ahead; and
- Generally we welcome the Local Plan's commitment to genuine sustainable development.

**Actions**

- Consider amendments to policy wording, within the constraints of the model policy.

**Document Sections: Policy CP6: Sustainable development (including Paragraph 7.7)****Nature of Response**

General comment  
 Support 1  
 Support with conditions 4  
 Objections 3

**ID and Name:** PO592 Natural England; PO1099 Environment Agency; PO360 METRO; PO275, PO276 WYAAS; PO66 English Heritage; PO534 Shibden Valley Society; PO390 Crosslee plc

**Summary of comments**

- Objection to the exclusion of the built & historic environment from the paragraph where it mentions categories of sites worthy of Environmental Protection;
- The policy should properly reflect the importance of protecting and enhancing the historic environment (including archaeological sites);
- Better links could be made to the Local Transport Plan and a definition of what is meant by 'accessible locations';
- The policy should provide flexibility in relation to future development opportunities and sustainability should not be a reason to hinder new development coming forward;
- Recommend that reference to protection and enhancement of the landscape should be included;
- In relation to reducing waste, the policy should refer to both the construction and occupation phases.



## Actions

Consider amendments to policy wording concerning the following topics:

- historic environment;
  - accessibility;
  - reducing waste;
  - landscape and flexibility.
-

## Document Sections: Chapter 8 - overarching comments and Policy CP7: Climate change

### Nature of Response

8

General comment 3  
Support 3  
Support with conditions 1  
Objections 3

**ID and Name:** PO189 McManus; PO536 Shibden Valley Society; PO308 Tattersall; PO436 Sandford; PO423 Yorkshire Wildlife Trust; PO1100 Environment Agency; PO901 Friends of The Earth (Calderdale); PO682 Redrow Homes (Yorkshire) Ltd; PO627 Directions Planning Consultancy; PO593 Natural England

### Summary of comments

- The policy should also include and refer to good services and facilities as without these there is greater car usage;
- Support for inclusion in the policy of the need to protect and enhance biodiversity as well as considering the way wildlife moves through the landscape;
- The policy could be improved by making reference to the particularly important role which trees can play both in climate change mitigation and adaptation;
- Support for reference in the policy to attractive, well-linked cycling and walking routes, the protection and enhancement of Green Infrastructure networks (and the acknowledgement of their benefits);
- The Council has not demonstrated how the proportions of development will deliver the policy considerations set out under Policy CP7; and
- Concern over the lack of reference to the Council's 40% carbon emissions reduction target.

### Actions

Consider amendments to policy wording concerning the following:

- include the 40% carbon emissions reduction target;
  - Reflect the role of trees;
  - Review the impacts of the levels of development proposed.
-

## Document Sections: Policy CP8: Locations for Sustainable Growth and Paragraph 9.1

### Nature of Response

General comment 6  
 Support 5  
 Support with conditions 7  
 Objections 7

**ID and Name:** PO226 Blackshaw Parish Council; PO137 Fox; PO1051 Lambert; PO684 Midgley; PO683 Redrow Homes (Yorkshire) Ltd; PO628 Directions Planning Consultancy; PO135 Highways Agency; PO842 David Wilson Homes; PO841 Barratt Homes; PO789 Thornhill Estates; PO703 HTL Properties; PO771 Roger Lee Planning Ltd; PO285 David Storrie Associates; PO73 English Heritage; PO567 Shibden Valley Society; PO997 Whitwam; PO392 Crosslee plc; PO386 DPP; PO594 Natural England; PO1069 B N P Paribas Real Estate; PO361 METRO; PO620 Mackay; PO322 Procter; PO15 P Casey Enviro Ltd; PO752 Asda Stores Ltd

### Summary of comments

Comments ranged from supporting the Policy through supporting it in principle but requiring specific amendments to objecting to it altogether, largely as it was perceived that by giving priority to brownfield sites development opportunities will be restricted:

- Is there a risk in seeking to utilise locations with good transport accessibility that ribbon development ensues thus linking up settlements?
- Table 6.12 suggests that across the whole of Calderdale, more than 60% of new housing will be built on Greenbelt land. At face value, this appears to be in conflict with maximising the use of brownfield sites. How do you reconcile the information in the table with the preferences for the location of sustainable development?
- An obvious way to minimise the take of Green Belt land is to allow development on greenfield sites in sustainable locations (bullet point 2 in Policy CP8) and therefore a more specific commitment to allowing such development should be included in the Plan;
- Whilst Policy CP8 sets out an appropriate methodology for the sequential selection of sites, it does not provide a sensible basis for determining planning applications;
- Prioritising development on previously developed land within existing urban areas will ensure the delivery of sustainable patterns of development and facilitate urban renewal and regeneration in line with the provisions of the NPPF;
- Support intent of Policy but in implementing it the most efficient use of brownfield and urban sites should be made having regard to density levels/height of buildings etc.
- Approach not considered conducive in assisting the Council to achieve its proposed housing growth targets;
- No objections to this proposed policy. It appears to be a logical approach to locating new development sites;
- Object to the approach in Policy CP8 as it proposes a 'brownfield first' approach when the priority should be ensuring sufficiency of supply whilst achieving sustainable development objectives.
- Policy CP8 sets out a sensible and sustainable approach to the location for development, promoting use of brownfield land first and then infill sites in urban areas which are well connected to public transport, walking and cycling routes, and are also in close proximity to local services;
- The sequence of locational preferences could influence the allocation of sites but a strict adherence to this approach should not be applied to assessing development proposals, which would be unduly onerous, as it goes beyond national policy;
- Natural England welcome the sequential approach set out in the policy, particularly the prioritisation of brownfield sites for delivering growth. The potential biodiversity value of brownfield sites should also be reflected in the policy wording;
- Support Policy subject to deletion of the third preference (referring to settlements on transport corridors);
- Support Policy CP8 and the land being promoted at Crosslee would meet the overall aims of the Policy;
- The policy should not include a hierarchy of locational preferences but should seek to promote sustainable development irrespective of the site's relationship with the main urban areas and higher order settlements;

- The NPPF seeks to encourage development and in order to achieve this a balanced portfolio of land is needed which includes urban extension sites and brownfield sites;
- Metro welcome the policy in principle but require more information to clarify what is meant by 'accessible locations' and 'good public transport' or better references to other policies within the core strategy or cross references to the LTP3.
- Presumably preference 2 includes greenfield sites. How does this sit with the proposed brownfield target?
- The currently unused sites of Callis Mill and The Woodman Pub on the A646 between Callis and Hebden Bridge might be suitable for sustainable development as they meet the criteria of being close to public transport routes, are brownfield sites and are currently dilapidated;
- The Highways Agency support the proposed sequence of locational preferences as it offers the best prospect of making best use of existing infrastructure and services and encouraging the use of public transport and the other sustainable modes instead of the car;
- English Heritage support the sequential approach to identifying sites for development and, in criterion 2, the requirement that the development of infill sites would need to conserve and enhance the character of the area; and
- The policy is inconsistent with other policies in the plan since other policies encourage the use of inert waste to restore former mineral sites which are unlikely to be within those areas referred to in Policy CP8. The policy needs to be amended to indicate that development in the form of inert waste used to restore old mineral workings is not covered by this policy.

## Actions

Some of the actions required to address concerns raised will come through the preparation of the Land Allocations document. Actions through the Core Strategy include:

- Greater clarification of brownfield targets and relationship with Table 6.12;
  - Consider whether bullet point 3 requires greater clarification;
  - Reference to potential biodiversity value of brownfield sites to be added to bullet point 1 of the Policy;
  - Accessible locations and good public transport to be more clearly defined/referenced; and
  - Ensure the sentence at the end of Policy CP8 also includes a cross-reference to the Waste Section of the Plan.
-

## Document Sections: Chapter 10 - all comments

### Nature of Response

General comment 5  
 Support 10  
 Support with conditions 8  
 Objections 18

**ID and Name:** PO313, PO519 Tattersall; PO352 Armstrong; PO742 Green Watch/Residents Group/Road Safety Committee; PO708 Battye; PO971, PO959, PO961 Gregory Gray Associates; PO320 Scargill; PO169, PO178 Marshall; PO240 Foster; PO323 Procter; PO537, PO538 Shibden Valley Society; PO393 DPP; PO287 David Storrie Associates; PO902, PO911 Friends of The Earth (Calderdale); PO845, PO848 David Wilson Homes; PO843, PO847 Barratt Homes; PO686, PO693 Redrow Homes (Yorkshire) Ltd; PO629, PO630 Directions Planning Consultancy; PO1083 Kirklees MC; PO792 Thornhill Estates; PO709 HTL Properties; PO692 Midgley; PO1054 Lambert; PO1070 B N P Paribas Real Estate; PO999, PO1000 Whitwam; PO34 Brundell; PO16 P Casey Enviro Ltd; PO175 Bottomley; PO596 Natural England; PO3 Woodcock; PO170 Marshall

### Summary of comments

Policy CP9: Green Belt Extent and the associated paragraphs received a number of comments. These included:

- Support for amending the boundaries due to reasons such as a lack of alternative areas and that such a review is 'long overdue';
- Objections on the basis that such amendments are considered unnecessary and the impact upon the character of the district;
- Brownfield sites to be prioritised before Green Belt release was considered; and
- Lack of exceptional circumstances identified for amending the Green Belt as required by the NPPF.

Policy CP10: Development in the Green Belt and its associated paragraphs received some support but many considered the policy superfluous as it is considered to repeat the NPPF.

Policy CP11: Development in the Area Around Todmorden received a number of comments the majority of which were concerned that it is not currently covered by Green Belt policy and many wanted this changed because they consider it would provide greater protection from development within the countryside surrounding the town.

Other comments included were the need for a phasing policy to stop developers 'cherry picking' Green Belt sites and references to a number of specific sites.

### Actions

The evidence base for the Core Strategy indicates a clear need to review the Green Belt if the Council is to fulfil its development needs as identified within the NPPF. In addition during the examination of the RCUDP, 2006 the inspector noted that at the next phase of plan making Calderdale's Green Belt boundary needs to be amended to fulfil likely development requirements:

The actions in respect of the Green Belt the Council will take to fulfil its requirements are:

- Actively seek new sites outside of the Green Belt, including those in public ownership, to minimise the amount of Green Belt land required;
- Undertake a review of the Green Belt to consider, in areas of development pressure, whether current Green Belt boundaries are fit for purpose and if they fulfil the requirements of Green Belt as set out within the NPPF;
- Consider the merits of including the Area Around Todmorden within the Green Belt. In doing this an assessment of how the area performs against the tests set out within paragraph 82 of the NPPF will need to be considered; and
- Consider the need for Policy CP10 in light of para. 89 of NPPF (Policy varies marginally from NPPF).

Issues such as individual sites, detailed Green Belt boundaries and phasing of sites will be considered within the Land Allocations and Designations document.

## Document Sections: All Policies and Paragraphs

### Nature of Response

11

General comment 1  
Support 4  
Support with conditions 5  
Objections 3

**ID and Name:** PO 751 Asda Stores Ltd; PO631 Redrow Homes (Yorkshire) Ltd; PO694 Directions Planning Consultancy; PO1101 Environment Agency; PO1055 Lambert; PO362 METRO; PO707 Midgley; PO324 Procter; PO912 Friends of The Earth (Calderdale); PO492 WYAAS; PO74 English Heritage; PO593 Shibden Valley Society; PO434 Crosslee plc

### Summary of comments

The majority of comments to this section on 'High quality inclusive design' were in support of the policy. However a number of comments were received suggesting improvements:

- Contemporary, innovative design should consider the impact on all heritage assets not just listed buildings and conservation areas;
- Amend wording of policy to include reference to public transport accessibility, and include reference to incorporating public transport and design toolkits in the preceding justification text; and
- Inclusion of a reference to "water efficiency" of new development design in the text in paragraph 11.2 and in the Policy CP12 under the sustainability heading.

Specific objections to the policy relate to the following matters:

- The policy is overly onerous, introduces requirements over and above national planning policy requirements, and addresses matters that are not related to planning policy; and
- The wording of the policy infers that developers will have to maintain large development sites for a minimum of 5 years. It is not clear from the policy what this actually means.

### Actions

- Consider the amendment/clarification of wording in Policy CP12 to address the issues raised.
-

## Document Sections: Policy CP13: Sustainable Design and Construction and Table 12.1

### Nature of Response

General comment 2  
 Support 2  
 Support with conditions 3  
 Objections 10

**ID and Name:** PO447, PO448 Yorkshire Wildlife Trust; PO632 Directions Planning Consultancy; PO598 Natural England; PO1102 Environment Agency; PO1056 Lambert; PO418 DPP; PO522 McCarthy & Stone (Developments) Ltd; PO710 Midgley; PO913 Friends of The Earth (Calderdale); PO695 Redrow Homes (Yorkshire) Ltd; PO856 David Wilson Homes; PO854 Barratt Homes; PO825 Thornhill Estates; PO738 HTL Properties; PO617 Clugston Developments; PO795 CP Group Limited

### Summary of comments

- The policy is over burdening the developer by increasing restrictions and subsequently jeopardising the financial viability of developments;
- Support for inclusion of green infrastructure and the need to protect and enhance biodiversity within this policy;
- Request for further guidance on how to achieve delivery of green infrastructure and the protection and enhancement of biodiversity;
- It would be useful to have a method of monitoring how successful the policy is in delivering green infrastructure and new habitats;
- Question over the deliverability and priorities of the policy when considered in line with the other local plan requirements;
- Recognition of the role that urban design can play in creating sustainable places is welcomed, along with reference to BREEAM and the Code for Sustainable Homes;
- Support for identifying the opportunities that low density suburban/rural areas will offer in relation to large-scale strategic green space infrastructure and flood storage;
- As currently worded the policy provides for a scale of obligation that threatens the ability of development to be delivered viably;
- Building Regulations are the appropriate means for ensuring energy efficiency standards are met, there is no reason why planning needs to repeat those standards.
- Developers should aim for efficiencies in fabric first;
- Local design guides should be established that shape inward investors and developers requirements;
- No justification for the council's proposal requiring greenfield sites to be built to a higher Code for Sustainable Homes level than brownfield sites;
- The whole policy is too specific and inflexible, bearing in mind how quickly this area of regulation changes at a national level;
- The policy framework should aim to secure high quality contemporary design, whilst preserving the historic character of the district; and
- Recommend the policy includes reference to water efficiency.

### Actions

- Further work will be carried out in relation to the viability assessment of policies and to establish the impacts of the recent changes (Dec 2012) to the Building Regulations;
- Further work will be carried out on the monitoring indicators.

**Document Sections: Paragraphs 13.1 to 13.3****Nature of Response**

General comment 3  
 Support 1  
 Support with conditions  
 Objections 1

**ID and Name:** PO29 Mobile Operators Association; PO225, PO227 Blackshaw Parish Council; PO326, Procter; PO914 Friends of The Earth (Calderdale);

**Summary of comments**

A wide variety of comments were received to this section including:

- The need for a specific policy for telecommunications;
- Detailed comments upon locationally specific infrastructure requirements;
- Improvements to broadband provision;
- Support for the continued use of section 106 for infrastructure improvements; and
- Objections to the assertion that no 'show-stoppers' to development were identified in the infrastructure study particularly with regards the M62.

**Actions**

Whilst the comments make valid points most are already being dealt with through the Core Strategy or will be matters for other documents or decision makers, such as Parish Councils and how they may wish to use their proportion of any CIL monies. The issue of a specific policy for telecommunications will be given due consideration.

Regarding infrastructure deficits which would be a 'show-stopper' to development, the Core Strategy reflects conversations with infrastructure providers. It does not mean there are no infrastructure deficits simply that these could be overcome providing the correct mitigation and funding can be found.

**Document Section: Policy CP14: Infrastructure Provision****Nature of Response**

General comment 5  
 Support 2  
 Support with conditions 2  
 Objections

**ID and Name:** PO327 Procter; PO138 Highways Agency; PO363 METRO; PO449 Yorkshire Wildlife Trust; PO864 David Wilson Homes; PO860 Barratt Homes; PO711 Midgley; PO1057 Lambert; PO599 Natural England

**Summary of comments**

The Policy was generally supported. There was specific support for the inclusion of the range of infrastructure types identified within the policy. Issues were raised regarding its introduction including:

- Inclusion of specific infrastructure work provided by the Highways Agency and commitment to continue to work with the Council on infrastructure issues by Metro and others; and
- The Council need to consider development viability and the impact of other policy requirements in its consideration of CIL.

**Actions**

The Council are currently updating an infrastructure study to support CIL which will include any new information from infrastructure providers. In addition the Council are undertaking the viability work required for CIL, alongside an assessment of other policy requirements. The outcomes of these studies will provide evidence upon whether and when CIL can be implemented within Calderdale.



**Document Sections: Paragraph 14.1****Nature of Response**

General comment 2  
Support 1  
Support with conditions  
Objections 1

**ID and Name:** PO728, PO730 Lancashire County Council; PO863 Sport England PO915 Friends of The Earth (Calderdale);

**Summary of comments**

A number of comments were received regarding the economy generally and are summarised below:

- The defining references to the economic objectives should include references to the need for the future economy to be 'low carbon';
- Remove reference to Lancashire City Region and replace with Lancashire;
- Support for inclusion of cross boundary issues with Lancashire; and
- Need to consider the importance of sport and sport related activities to the economy.

**Actions**

A number of actions resulting from the comments were identified:

- The inclusion of reference to a low carbon economy will be considered within the strategic objectives section of the Core Strategy;
- In future the document will refer to Lancashire rather than 'Lancashire City Region'; and
- Consideration will be given as to whether proposed policies within this section adequately reflect the importance of sport and related activities to the economy.

**Document Sections: Paragraphs 14.5 & 14.6****Nature of Response**

General comment 2  
Support  
Support with conditions  
Objections 1

**ID and Name:** PO139 Highways Agency; PO607 Clugston Developments; PO916 Friends of The Earth (Calderdale);

**Summary of comments**

A few comments considered the introductory paragraphs to Employment Land requirements in the district. A variety of comments were made including:

- Objections to siting significant employment provision near the M62 due to knock-on effects on the M62 and carbon emissions; and
- Other comments relating to specific sites.

**Actions**

The issue of carbon emissions and traffic generation are important, however these must be balanced against the need to attract inward investment and new jobs into the area. The Council will continue to work with the Highways Agency, Metro and other bodies to identify solutions to improving traffic flows and reducing traffic demand from new developments.

## Document Sections: Policy TPE1: Providing employment land and premises for future need

### Nature of Response

General comment 4  
Support 4  
Support with conditions 3  
Objections 2

**ID and Name:** PO140 Highways Agency; PO364 METRO; PO396 Crosslee plc; PO713 Midgley; PO753, PO754 HTL Properties; PO799 CP Group Limited; PO833, PO846, PO839 Thornhill Estates; PO917 Friends of The Earth (Calderdale); PO1058 Lambert; PO1078 Kirklees MC;

### Summary of comments

Many of the comments made supported Policy TPE1 some did, however, raise concerns. These were:

- Requests for office development in and on the edge of Huddersfield town centre to be specified as a factor in the sequential test;
- Discourage low density development and encourage re-use of over the shop accommodation;
- Improve the definition of good quality transport in the policy;
- Recommend amending 'Outside of town centres large-scale office development will usually be restricted to ...' - delete 'usually' and add at start of sentence 'Except in exceptional circumstances ...';
- Objection to locating on brownfield rather than greenfield, unless local circumstances dictate otherwise because it is considered that both greenfield and brownfield sites will be required to provide levels of employment envisaged; and
- Recommend re-wording policy to more closely reflect full range of centres in the retail hierarchy.

### Actions

A number of actions which will assist in improving Policy TPE1 were identified through the comments. These were:

- The issue of including specific reference to Huddersfield in the policy is considered inappropriate. The policy will, however, be reworded to include reference to relevant centres in adjacent districts;
- The Council will consider improving the definition of good quality transport in the policy; and
- The policy will be re-worded to better reflect the full range of retail centres.

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## Document Sections: Policy TPE2: Safeguarding existing employment sites

### Nature of Response

General comment 2  
Support 1  
Support with conditions 1  
Objections 1

**ID and Name:** PO394 Crosslee plc; PO1071 B N P Paribas Real Estate; PO1059 Lambert; PO715 Midgley; PO277 WYAAS

### Summary of comments

The proposed policy only attracted minimal comments which are summarised below:

- Objections to the policy as it is considered too restrictive concerning the release of employment sites the objector considers this contrary to the NPPF;
- Discourage low density development and encourage re-use of over the shop accommodation; and
- Site specific issues.

**Actions**

To make the policy more compliant with the NPPF the policy will be amended so that bullet 4 is a separate reason for release in addition to bullets 1 to 3.

**Document Sections: Policy TPE3: Diversifying the economy****Nature of Response**

General comment 2  
Support  
Support with conditions 1  
Objections

**ID and Name:** PO190 McManus OBE; PO600 Natural England; PO451 Yorkshire Wildlife Trust

**Summary of comments**

Limited discussion on this policy, however, the following comments were made:

- Should introduce a new Calderdale currency;
- Opportunities for nature tourism should be further discussed; and
- Suggest additional statement within the policy regarding impact upon countryside with regards economic activity outside of the main urban areas and definition of unacceptable levels of unsustainable transport.

**Actions**

The policy will be amended to provide reference to the protection of the open countryside and define unacceptable levels of unsustainable transport.

**Document Sections: Policy TPE4: Calderdale retail hierarchy****Nature of Response**

General comment 1  
Support 4  
Support with conditions 1  
Objections 2

**ID and Name:** PO540 Shibden Valley Society; PO259 Tattersall; PO365 METRO; PO405 DPP; PO397 Crosslee plc; PO918 Friends of The Earth (Calderdale); PO746 Tesco Stores Ltd.; PO799 CP Group Limited

**Summary of comments**

The majority of comments made were generally in support of proposed Policy TPE4 some did, however, raise a few areas of concern over specific centres identified within the hierarchy. These were:

- Stainland and Holywell Green should be split into separate settlements and reclassified within the retail hierarchy;
- Northowram has unaccountably been promoted up the retail hierarchy; and
- Ovenden and Illingworth and the hierarchy in general should be reconsidered within the North Halifax masterplanning process.

**Actions**

The hierarchy will be re-considered in light of comments received. Improvements to the quality and quantity of retail facilities (and services) in North Halifax in particular will be key to the positive, regenerative effects of future

development in the area. The wording of Policy TPE4 and the proposed retail hierarchy will therefore be reconsidered prior to the publication version of the Core Strategy being complete.

## Document Sections: Policy TPE5: Retail impact assessments and local thresholds

### Nature of Response

General comment 1  
Support  
Support with conditions  
Objections 3

**ID and Name:** PO219 Turley Assoc; PO610 Clugston Developments; PO 749 Asda Stores Ltd; PO747 Tesco Stores Ltd.;

### Summary of comments

The majority of comments received in relation to Policy TPE5 were objecting to various different aspects. Reasons for concern were as follows:

- Such low thresholds could result in an onerous requirement for an applicant at best or a barrier to development at worst;
- There is no tangible evidence to support a zero threshold for retail impact assessment outside existing District Centres;
- The expenditure approach put forward does not explain why 10% of current expenditure is an important 'trigger point' for undertaking a detailed analysis;
- The blanket requirement for major applications to assess impacts up to 10 years from the time the application is made does not accord with the NPPF;
- Impact assessments should only relate to sites over and above any allocated within forthcoming Local and Neighbourhood Plans and this should be made clear within the policy;
- There should not be different thresholds for convenience and comparison goods; and
- Issues of 'scale' and 'local markets' should not be considered as relevant local impacts and should be removed from the policy criteria.

### Actions

Further investigations are required to consider the likely impacts of the policy requirements of TPE5, particularly the zero thresholds on 'all other centres'. Re-consider the impact assessment thresholds in the policy in light of findings and comments received. Expand justification text where necessary to justify the approach taken.

## Document Sections: Policy TPE6: General town centre principles

### Nature of Response

General comment  
Support  
Support with conditions 3  
Objections

**ID and Name:** PO75 English Heritage; PO279 WYAAS; PO366 METRO;

### Summary of comments

Although few comments were received in relation to this policy (all of which were generally in support) some suggested improvements to the policy wording were made:

- The accessibility aspect of the policy could be strengthened to include better references to the LTP for example proposals for the introduction of transport HUBs; and
- With regards to amenity, applicants should be required to do more than 'consider' distinctiveness and the sense of place.

### Actions

Amend wording in line with suggested improvements

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### Document Sections: Policy TPE7: Local retailing and service provision outside of centres

#### Nature of Response

General comment 1  
Support  
Support with conditions  
Objections 1

**ID and Name:** PO220 Turley Assoc.; PO750 Tesco Stores Ltd.

#### Summary of comments

Comments received in relation to Policy TPE7 expressed the following concerns:

- 'Scale' referenced in the second criterion is no longer a relevant policy test;
- The third criterion is unduly prescriptive, complicated and very difficult to assess; and
- The fourth criterion needs to be reviewed within the context of the threshold criteria, and small scale proposals.

### Actions

Reword Policy TPE7 to clarify the link between TPE7 and TPE5: Retail Impact Assessments and Local Thresholds. Also further work to be undertaken to review policy TPE7 in light of comments on the second, third and fourth criteria.

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### Document Sections: Policy TPE8: Hot food takeaways

#### Nature of Response

General comment  
Support 3  
Support with conditions  
Objections

**ID and Name:** PO76 English Heritage; PO281 WYAAS; PO920 Friends of The Earth (Calderdale)

#### Summary of comments

All comments received to Policy TPE8 were in support of the policy approach and intentions.

**Actions** No further action

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### Document Sections: Policy TPE9: Cultural provision

#### Nature of Response

General comment  
Support 1

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Support with conditions  
Objections

**ID and Name:** PO215 The Theatres Trust

14

## Summary of comments

The only comment received to Policy TPE9 was in support, and clarified the role that cultural provision has within the district.

**Actions** No further action

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**Document Sections: Chapter 15 - overarching comments****Nature of Response**

General comment 2  
Support  
Support with conditions  
Objections 1

**ID and Name:** PO162 UCVR Sustainable Transport Group; PO568 English; PO237 Baslington

**Summary of comments**

General comments regarding the transport section including wide ranging support to fund and lobby for new infrastructure to improve public transport and reduce congestion. Some specific ideas for new infrastructure were also provided.

A more radical suggestion was to introduce a congestion tax.

**Actions**

No specific actions were identified. The Council will however continue to work with transport providers and the Highways Agency to identify solutions to congestion and ways to reduce reliance on the private car.

**Document Sections: Paragraphs 15.1 to 15.4****Nature of Response**

General comment  
Support  
Support with conditions 1  
Objections 3

**ID and Name:** PO621, PO641, Mackay; PO921, PO923 Friends of The Earth (Calderdale)

**Summary of comments**

The introductory paragraphs to the transport section attracted a number of comments. These are summarised below;

- Need for a freight strategy;
- The section requires greater emphasis on how the need to travel will be reduced; and
- Recommend lowering carbon emissions should be a strategic aim of the transport section.

**Actions**

The issue of lowering carbon emissions is important to the Council and consideration will be given to amending the relevant strategic objective. The Council will also consider whether a freight policy is required in the Core Strategy.

**Document Sections: Policy TPT1: Making sure places are properly connected (including Paragraphs 15.8 to 15.15, Map 15.1)****Nature of Response**

General comment 11  
Support 6  
Support with conditions 3  
Objections 3

**ID and Name:** PO14 Knott; PO141, PO142, PO143, PO144, PO145 Highways Agency; PO172 Bottomley; PO328 Procter; PO367, PO368, PO369 METRO; PO602 Natural England; PO643, PO644, PO645, PO646, PO648 Mackay; PO720 Midgley; PO723 Lancashire County Council; PO924, PO928 Friends of The Earth (Calderdale); PO399 Crosslee plc; PO1060 Lambert;

## Summary of comments

Policy TPT1 and the supporting paragraphs received a number of comments many of which supported the general principles, however a number of specific comments were received:

- Support for improvements to Calder Valley Line improvements including stations at Elland and Hipperholme;
- Inconsistency between the text, the map and regional documents regarding priority routes and appear to be few priority routes in the west of the district;
- Travel demand on roads should be discouraged by types and locations of development, Network Rail has to be 'made' to up the inclusion of new stations and transport/freight nodes in our district;
- Need for a parking policy;
- Need to improve our transport infrastructure by dealing with 'bottlenecks', improving cycling provision etc.; and
- Concern regarding congestion on the M62 and effect of new road infrastructure on carbon emissions.

## Actions

A number of actions have been identified from the comments including;

- Continued discussion with Metro, regional partners and transport providers to improve public transport and provide mechanisms to fund new transport infrastructure; and
- The Council will review the priority routes and check compatibility with regional documents.

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## Document Sections: Policy TPT2: Sustainable travel (including Paragraphs 15.16 to 15.20)

### Nature of Response

General comment 2  
Support 5  
Support with conditions 4  
Objections 5

**ID and Name:** PO147, PO148, PO149 Highways Agency; PO370 METRO; PO500 Coy; PO603 Natural England; PO400 Crosslee plc; PO541 Shibden Valley Society; PO649, PO652, PO654 Mackay; PO616 Clugston Developments; PO804 CP Group Limited; PO929, PO932, PO934 Friends of The Earth (Calderdale);

## Summary of comments

Policy TPT2 drew both support and objection and the comments made are summarised below:

- Towpaths are an important sustainable transport network which should be included in the policy;
- Recommend that the policy should include wording which seeks to protect National Trails, footpaths, bridleways and cycle networks;
- Need to identify the Core Bus Network;
- Need for a parking strategy;
- Object to a Travel Plan being the only identified way of mitigating against travel demand as this will not always work, sometimes the development should not proceed; and
- Recommend amend wording to 'electric car charging points will be supported for all new major developments, where it can be shown to be viable to provide for such facilities'.



**Actions**

- Rewording of the policy will be considered to deal with the issues of towpaths, national trails and electric car charging points noted above; and
- The Core Bus network will be clarified with Metro and included in the supporting text to this policy.

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**Document Sections: Policy TPT3: Transport requirements for site allocations and development proposals (including Paragraphs 15.21 to 15.28 and Map 15.4)**
**Nature of Response**

General comment 1  
 Support 1  
 Support with conditions 6  
 Objections 2

**ID and Name:** PO150, PO151, PO152, PO153 Highways Agency; PO283 WYAAS; PO371, PO372 METRO; PO402 Crosslee plc; PO408; PO660 Mackay;

**Summary of comments**

Policy TPT3 was generally supported by those commenting, however a number of concerns were raised including:

- Policy TPT3 sets out a sound and justified policy base for the allocation of sites in the Land Allocations DPD but is not sufficiently flexible and could be interpreted in such a way as to mean that sustainable sites are not allocated for development;
- Support for the accessibility standards however the compatibility of the Public Transport Accessibility Map with the LTP needs to be re-examined;
- Applications for proposed developments that could generate traffic that will impact on the operation of the Strategic Road Network must be supported by robust and enforceable travel plans
- The policy could be strengthened to include an 'Influencing Travel Behaviour' section;
- Only lip service provided to the 'user hierarchy'; and
- The indication in Policy TPT3 to be more restrictive than the parking standards set out in the saved RCUDP policy T18 where circumstances permit is welcomed.

**Actions**

- The compatibility of the Core Bus Networks and growth areas will be re-examined together with the accessibility standards; and
  - The impacts of traffic growth created by a development will be factored into policy TPT3.
-

## Document Sections: Chapter 16 - overarching comments and Paragraphs 16.1 to 16.10

### Nature of Response

General comment 3  
Support 9  
Support with conditions 1  
Objections 2

**ID and Name:** PO4, PO5, PO6, PO7, PO8, PO9 Clayton; PO1096 Environment Agency; PO726 Lancashire County Council; PO452 Yorkshire Wildlife Trust; PO214 Todmorden Town Council; PO284, PO286, PO288 WYAAS; PO78 English Heritage; PO542 Shibden Valley Society

### Summary of comments:

- Recognition of the importance of minerals to the economy is supported and welcomed;
- Support the text stating that mineral workings must be undertaken in accordance with the principles of sustainable development;
- Calderdale Council has a responsibility in determining mineral applications to protect the natural, built and historic environment;
- Support for highlighting the benefits of locally sourced extraction;
- Recognition of the importance of locally sourced building stone, including the reinforcing of local identity and quality of built environment is welcomed and supported;
- Supporting comments for the recognition of the need to maintain the economic viability of some quarries to ensure an adequate supply of local building stone to ensure the repair of important historic buildings; and
- Recognition of the link between local building stone and conservation/employment is welcomed and supported.

### Actions

- A review of the BGS/English Heritage County Building Stone Study will be carried out in relation to the built heritage and local mineral supply.

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## Minerals Strategy

### Document Sections: Policy TPM1: Minerals strategy (including Table 16.1)

### Nature of Response

General comment  
Support 2  
Support with conditions  
Objections 3

**ID and Name:** PO10 Clayton; PO50 The Coal Authority; PO77 English Heritage; PO926 Mineral Products Association; PO936 Friends of The Earth (Calderdale);

### Summary of comments

- Calderdale has been and continues to be a major supplier of building stone, therefore support the overall thrust of policy TPM1;
- The policy does not address the potential need to reopen disused quarries for specific sources of stone related to the repair of a particular historic building;
- The content of the two policies is confusing since some matters which we would judge as strategic are found in the policy on safeguarding;
- The national importance of the Dimension Stone production in the District is not sufficiently highlighted. Its continuation as a centre for Dimension Stone production is crucial to the continued health of the industry;

- Clarification is needed in the distinction between aggregate minerals and non aggregate minerals;
- Provision needs to be made for Dimension Stone as an industrial mineral, and for a contribution to the sub regional aggregates apportionment, together with the appropriate minimum duration of reserves;
- Designating Mineral Safeguarding Areas (MSAs) should be carried out in accordance with the 2011 BGS guidance;
- Objection to the exclusion of sand and gravel from MSAs;
- Support for the definition of a Mineral Safeguarding Area (MSA) for surface coal resources; and
- Add a policy criterion providing for environmental protection.

#### Actions:

- The policy will be amended to clarify the minerals strategy;
- Further work will be carried out in relation to including criteria concerned with historic quarries;
- The policy and supporting text will emphasise the national importance of Dimension Stone;
- A review of the BGS 2011 MSA guidance will be carried out;
- Consideration will be given to including Sand and Gravel within MSAs;
- A Local Aggregate Assessment will be carried out, in order that a contribution to the sub regional aggregates apportionment can be established; and
- Inclusion of environmental protection criteria in the policy.

## Minerals Safeguarding Areas

**Document Sections: Policy TPM2: Minerals Safeguarding Areas (including Paragraphs 16.14 to 16.24 & Table 16.2)**

#### Nature of Response

General comment

Support 2

Support with conditions 8

Objections 7

**ID and Name:** PO11, PO12, PO13 Clayton; PO51, PO52 The Coal Authority; PO67, PO68, PO69, PO70, PO71 Rathmell; PO270, PO272, PO273 Brewer; PO300 WYAAS; PO605 Natural England; PO944, PO948 Mineral Products Association;

#### Summary of comments

- There should be a positive obligation on developers to demonstrate that they have considered prior extraction and if it is not proposed, to justify the reasons why;
- There are no reasons why any areas where shallow coal reserves are present they should be excluded from the coal / clays MSA, including urban areas or heritage/environmental designations;
- Approach to coal MSA not in line with neighbouring MPAs, or MPAs in other parts of the country, or the NPPF;
- Prior extraction should be considered in all such cases and urban areas should thus be included within the coal/clays MSA;
- Objection to the absence of other designated heritage assets from the list of areas to be excluded from coal & clay MSA;
- List should be extended to include all categories of designated heritage assets, Class II archaeological sites, and areas of regional archaeological importance;
- Prior extraction should not be limited to sites of 5ha or above within the urban area. There have been numerous examples of successful small prior extraction schemes on sites down to 0.2ha in size;
- The thresholds are not justified;
- The distinction between the two thresholds is not at all clear;
- Support the intention in Policy TPM1 not to grant permission for peat extraction;

- It should be noted that bird species for which the South Pennine Moors SPA is designated may use areas outside of the SPA boundaries for roosting and feeding, therefore important to protect the designated areas and functionally connected land from mineral extraction;
- The potential for impacts of mineral extraction on off-site habitats important to the SPA should be considered through the Habitats Regulations Assessment for the Land Allocations document;
- Support for identifying areas valued for biodiversity within the Land Allocations document, but would like to see this extended to include areas valued for their geodiversity;
- Repetition in the first line of the policy;
- References to site allocations are strategic in nature and should not be linked to a policy on mineral safeguarding;
- National guidance is that MSAs should be designated without recognition of environmental designations;
- Clarity required on the proposed buffer zones;
- Amendments have been proposed to the policy to clarify the difference between the potential for prior extraction, and the potential for sterilisation by proximal development;
- Abnormal development costs should be excluded from the policy criteria as this is not recommended as a reason for the preference for non mineral development;
- Support for excluding urban areas from the sandstone MSA because it will not be appropriate to consider prior extraction in the case of this mineral; and
- Objection as the MSA policy in the Core Strategy is predicated on utilising the methodology set out in the 2007 BGS study, this has been updated in 2011.

## Actions

- Further work will be carried out on the methodology for identifying Mineral Safeguarding Areas, including:
    - Environmental designations;
    - Buffer zones;
    - Difference between potential for extraction and potential for sterilisation by adjacent development;
    - Thresholds;
    - Other proposed exclusion criteria.
  - Review the proposals for surface coal and sand and gravel.
  - Clarify the policy to avoid repetition.
  - Amend the policy wording to avoid confusion between site allocations and MSAs.
  - A review of the BGS 2011 MSA guidance will be carried out.
-

**Document Sections: Policy TPW1: Planning for sustainable waste management (including Paragraph 17.4)****Nature of Response**

General comment 1  
 Support 1  
 Support with conditions 3  
 Objections 1

**ID and Name:** PO17, PO18 Enviro Ltd; PO154 Highways Agency; PO301 WYAAS; PO606 Natural England; PO1092 Environment Agency;

**Summary of comments:**

- Uncertain as to how the Waste Planning Authority (WPA) plan to deal with residual waste;
- The distance that waste must be carried to landfill or treatment sites should be one of the criteria used in policies relating to the area of search and locational decisions for waste facilities;
- At present it is not at all clear in the core strategy how the residual element of non inert waste will be managed;
- The policy approach to using the valuable resource of inert waste in the restoration of mineral sites or landraising with clear benefits is welcomed and supported;
- The wording of the last bullet point of item (c) in policy TPW1 for new landfill facilities seems to misinterpret national policy as set out in the Framework. The use of the word "environmental risks" is blurring what national policy says. The test is not environmental risk but rather significant harm or adverse impacts;
- Support the exclusion of conservation area consents & listed building consents from non waste development proposals that must provide evidence as to the arrangements for onsite waste management;
- We welcome the inclusion of this policy addressing sustainable waste management and the hierarchy of development it imposes, although propose amending the wording slightly concerning the environment and groundwater sources. We would also welcome additional wording stating that proposals for new landfill facilities will not be permitted if there will be an adverse impact on European, nationally or locally designated sites or the land that supports their function;
- We support the inclusion of this policy, and the fact that the waste hierarchy is put at the heart of decision making on new and extended facilities; and
- Clarification needed against Part C of the policy as to whether all or one of the criteria are required to be met.

**Actions**

- Update of the Waste Data Evidence Report;
- Clarify how non inert residual waste will be dealt with; and
- Clarify part C of the policy concerning landfill.

**Waste Data Evidence****Document Sections: Policy TPW2: Broad areas of search for new waste facilities (including Paragraph 17.9 to 17.18)****Nature of Response**

General comment 3  
 Support  
 Support with conditions 2  
 Objections 1

**ID and Name:** PO19 Enviro Ltd; PO608 Natural England; PO1093, PO1095 Environment Agency; PO938 Friends of The Earth (Calderdale); PO543 Shibden Valley Society

## Summary of comments:

- We find the data sources used to be appropriate and the assumptions made to be reasonable;
- Object pending further clarification of Municipal Solid Waste (MSW) projections;
- Important to emphasise the importance of rigorous application in the future of the tests in Policy TPW2 C and TPW3 for New Waste Management Facilities;
- We welcome the inclusion of this policy and the requirement for proposed waste management facilities outside the Core Areas/Safeguarded sites to demonstrate that they are acceptable, although recommended that part C is reworded to avoid any ambiguity as to what 'unacceptable adverse impacts' are; and
- Under part b the requirement for existing waste facilities to provide evidence of suitability is unclear.

## Actions

- Update of the Waste Data Evidence Report, including MSW projections if available; and
- Consider amending the wording of the policy to provide clarity, specifically in parts B and C.

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## Document Sections: Policy TPW3: Proposals for new waste management facilities and Table 17.4

### Nature of Response

General comment  
Support 1  
Support with conditions 1  
Objections 3

**ID and Name:** PO20 Enviro Ltd; PO609 Natural England; PO1094 Environment Agency; PO79 English Heritage; PO302 WYAAS; PO72 Rathmell

### Summary of comments

- The opening line of this policy needs amended to make it consistent with the phrase used in TPW2, and to clarify the impact needs to be adverse, which would align the policy with the approach set out in NPPF;
- The first bullet point sets out that proposals will be required to avoid adverse impacts, but the wording should be amended to read 'unacceptable adverse impacts', since there may be adverse impacts that in the overall balance of a decision are acceptable or that can be mitigated to an acceptable degree;
- The NPPF makes it clear that development proposals need to take account of the potential impact that they might have upon the setting of heritage assets. This applies to all heritage assets, not only Conservation Areas and Listed Buildings. The relevant criterion could be shortened by simply referring to 'heritage assets';
- Recommend the wording of the policy is amended to ensure the proposal will not give rise to any adverse impacts on people, transport routes or the environment';
- Support for the inclusion of the nine criteria with which proposals must demonstrate compliance, particularly bullet points one and four, however the protection of European sites should also be included;
- Pleased to see reference is made to ensuring that proposals do not create adverse impacts on water resources and the water environment and biodiversity; and
- Consideration is needed to be given concerning the potential of a safeguarded minerals or waste site to constrain development on adjoining land.

### Actions

- Review the policy wording concerning adverse impacts and heritage assets;
  - Include European nature sites in the policy criteria; and
  - Consider potential of minerals and waste development to constrain adjacent development.
-

**Document Sections: Paragraphs 18.1 to 18.21 (including Maps 18.1 & 18.2)****Nature of Response**

General comment 5  
 Support  
 Support with conditions 1  
 Objections 1

**Name and ID:** PO191, PO192 McManus OBE; PO941 Friends of The Earth (Calderdale); PO325, PO515 Tattersall; PO868 Sport England; PO811 CP Group Limited

**Summary of comments**

A number of varied comments were received concerning the background text to the well-being section. Not all were directly relevant to planning or were about individual settlement issues. The more general comments relevant to planning included:

- Want more allotments to be provided due to long waiting lists;
- Need to include indoor sports facilities; and
- Request that appropriate recognition be given to the role to be played by the full range of accommodation for the elderly from flats for independent living, to extra care, to care home facilities.

**Actions**

- Allotments are an important part of well being and are being considered;
- The inclusion of sports facilities in this section will be considered; and
- Further work regarding need identified within SHMA.

**Document Sections: Policy TPC1: Community, health and education****Nature of Response**

General comment 4  
 Support  
 Support with conditions  
 Objections

**Name and ID:** PO39 CAMRA; PO501 Coy; PO722 Midgley; PO1061 Lambert

**Summary of comments**

The comments made on this policy included:

- The need for a separate policy to protect the loss of public houses;
- The Canal and Rivers Trust wish to be further involved as towpaths and waterways form a valuable resource for a 'natural health service'; and
- Need to identify targets with regards the policy.

**Actions**

Further engagement with the Canal & River Trust as the Core Strategy continues to be developed. Targets will also be developed as the plan progresses.

## Document Section: Chapter 19 - overarching comments

### Nature of Response

General comment 2  
Support  
Support with conditions  
Objections 1

**ID and Name:** PO357 Scargill; PO859 Sport England; PO1113 Environment Agency;

### Summary of comments

A number of general comments were made relating to housing provision:

- Site of Shelf Interface Factory should be retained for employment use and the associated jobs provided;
- All developments including housing are required by the NPPF to provide the necessary sport and recreational facilities; and
- Greater explanation of how flood risk has been taken into account in arriving at the locations for growth.

### Actions

Many of these general comments relate to matters most appropriately addressed in the Land Allocations Document and/or the Infrastructure Delivery Plan:

- Re-appraisal of evidence in relation to flooding and more detailed explanation of how this was taken into account in arriving at the broad distribution of development both for housing and also for other land uses;
- Consideration be given to adding a further criterion to Policy TPH1 (Allocating Land for Housing) regarding the need to take account of flooding;
- Valuable employment land will be protected via Policy TPE2 (Safeguarding Existing Employment Sites) and the selection of sites for the Land Allocations document; and
- Sport and recreational facilities will be required as part of housing provision in order to meet the types of needs set out in the representation and will be reflected in the Infrastructure Delivery Plan.

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## Delivering the housing requirement figure

**Document Section: Policy TPH1: Allocating Land for Housing (including Paragraph 19.2 and Table 19.1)**

### Nature of Response

General comment 9  
Support 6  
Support with conditions 6  
Objections 15

**ID and Name:** PO171 Bottomley; PO453 Yorkshire Wildlife Trust; PO762 Green Watch/Residents Group/Road Safety Committee; Associates; PO136 Fox; PO633 Directions Planning Consultancy; PO696 Redrow Homes (Yorkshire) Ltd; PO1062 Lambert; PO391, PO409 DPP; PO781, PO783 Roger Lee Planning Ltd; PO425 METRO; PO329, PO342, PO343, PO490 Procter; PO725 Midgley; PO401 Philip S. Ryley & Co.LLP; PO951, PO952 Friends of The Earth (Calderdale); PO303 WYAAS; PO80 English Heritage; PO872 David Wilson Homes; PO867 Barratt Homes; PO289 David Storrie Associates; PO788, PO790 Thornhill Estates; PO690, PO704 I D Planning for HTL Properties; PO601 Clugston Developments; PO1072 B N P Paribas Real Estate; PO544 Shibden Valley Society; PO977 Gregory Gray Associates; PO1001 Whitwam; PO403 Crosslee plc; PO817 Cockburn



## Summary of comments

A range of comments were made from supporting the approach set out in the Preferred Options document to questioning the approach and some of the assumptions made, particularly regarding the contribution existing sources of land supply may make. Views polarised around the priority to be attached to brownfield sites and the role of settlement extensions:

- Housing target justified but should be expressed as a minimum;
- Requirement insufficient to meet objectively assessed needs, particularly as figure for Brighthouse similar to that originally for Hipperholme in New Growth Point. South Edge Quarry promoted as suitable site to help meet needs;
- Support approach to indicative quantum of land needed to meet housing target as long as review of deliverability of extant planning permissions taken;
- Explanation of methodology for distributing housing requirement requested;
- Confirmation of how sites in SHLAA will be incorporated into Land Allocations Document sought;
- Completions - unnecessary to include completions from 2008 – 2012. If the base date is moved forward to the time of adoption, no need to include this period of completions;
- Windfalls - figure needs more justification whilst historic trends may not be repeated in the future given policy changes in relation to the emphasis to be placed on brownfield land. Needs to be clear how garden sites have been categorised;
- Extant planning permissions - not all planning permission are implemented and therefore a discount should be applied to consented schemes;
- RCUDP allocations - if not delivered under the previous plan there must be a question about their deliverability;
- Taking account of the comments on the sources of supply as set out in Table 19.1 the amount of land to be found through allocations has been underestimated;
- The higher allocations figure will require more Green Belt land and should be refined further and hopefully reduced;
- Why does the Plan include both Policy CP8 and TPH1 given they address the same matter? How do the principles and priorities described in TPH1 relate to Policy CP8 (Locations for Sustainable Growth) and in the event of conflict, which policy takes precedence?
- The proposed 'brownfield first' approach is not compatible with the NPPF which promotes ensuring sufficiency of supply whilst achieving sustainable development objectives. The emphasis should be on whether the site is developable and deliverable, not whether it is greenfield or brownfield. To ensure delivery and regeneration a balanced portfolio of sites needs to be allocated;
- Where a green field site exists in a sustainable location and is adjacent to a brownfield site the green field site could and should be given the same status as the brownfield site thus allowing lower development costs leading to the achievement of more affordable housing;
- Support the principles that will be adhered to in identifying sites for new housing as set out in Policy TPH1 including prioritising brownfield and infill sites above extensions to settlements and the requirement to respect the environmental and historic character of settlements within the district;
- Support the general principles set out in policy TPH1, however more detail is required on the other sources of supply that will inform the scale of allocations and thereby the need to redefine green belt boundaries and allow extensions to existing settlements;
- Whilst supporting the approach set out in Policy TPH1 the question was raised as to how the Council will ensure this approach is adhered to and the best sites not simply 'cherry picked' because they are already available?
- The views expressed at the Halifax consultation meeting were quoted. These were essentially that all brownfield sites including those owned by the Council and empty or derelict property be explored first. Land banking and cherry picking should be avoided by developers building out existing permissions before being granted new ones. A strictly phased release of sites with greenfield or Green Belt sites as a final option should form policy;
- Specific wording changes were suggested to ensure brownfield sites are developed first. These are to include the 'priority use of brownfield land' in the Second and Third priorities as well, so as to ensure that Green Belt/greenfield sites in those second and third category locations are not developed before brownfield sites;
- Further wording changes were suggested including adding to the principles: 'minimise the use of Green Belt land' and 'seek to ensure that all possible brownfield sites are located and surveyed for potential use, and their owners encouraged to consider offering them for development'. This would

enable the Council to explore whether appropriate 'redensification' and regeneration were possible in specific areas;

- In prioritising brownfield land consideration should be given to the re-use/redevelopment of vacant employment sites for housing where the employment use is no longer viable, attractive to modern business or suitable;
- Extensions to the urban area are likely to involve the loss of Green Belt or countryside land, some of which may be of environmental or landscape quality;
- Extensions to settlements would reduce the accessibility of new housing developments as residents of such developments will be located away from existing community services and facilities located within the urban area, as well as employment opportunities and frequent public transport services. New housing development on urban extension sites may require the development of new community facilities, and this may not always be viable in the current economic climate;
- Local communities need to be involved in the land allocations process rather than it being driven by landowners. The proportion of development apportioned to settlements needs to be appropriate in terms of scale, location and contribute to the development of those communities rather than being perimeter development occupied by in-migrants who commute out of the district for work and do not really become part of the community;
- The inclusion within the policy to give due consideration to public transport accessibility requirements is welcomed; and
- Housing on a large scale is not appropriate in Calderdale and any developments should be on brownfield sites, within existing settlement limits whilst green spaces within housing developments should be retained.

## Actions

A range of responses are appropriate to the comments made including in some cases no further action and in others further work either on the Core Strategy or other related documents such as the Land Allocations Document. Some of these concern actions that would be undertaken anyway as they relate to ongoing monitoring but listing them here provides a useful indication of what is required to reach a Publication version of the Core Strategy:

- Core Strategy - the various sources of housing supply will continue to be monitored and inform the next iteration of the Plan with Table 19.1 (Sources of housing land supply) updated accordingly. This will then determine the actual level of supply to come from new land allocations;
- Core Strategy - Consideration to be given to adding the wording 'minimise the use of Green Belt land' and 'seek to ensure that all possible brownfield sites are located and surveyed for potential use, and their owners encouraged to consider offering them for development' to the principles set out in Policy TPH1;
- Core Strategy - In referencing the housing requirement figure consideration to be given to whether this should be worded as 'in the order of' or as a 'minimum';
- Core Strategy - The Housing Requirements Study be updated including its base date;
- Core Strategy - Include a phasing policy setting down the principles covering the order of site release;
- Land Allocations Document - Sites identified in the SHLAA together with other sites not yet identified to be subject to more detailed and rigorous assessment appropriate to the preparation of the Land Allocations document. This will include the detailed views of more consultees and the assessment of any environmental effects along with the outcomes of Sustainability Appraisal and consultation;
- Land Allocations document - To include a balanced portfolio of deliverable sites (both brownfield and greenfield) whilst maximising the opportunities to utilise brownfield sites;
- Land Allocations document - Green Belt boundaries to be re-defined in accordance with both the development strategy set out in the Preferred Options and the Green Belt Review methodology;
- Land Allocations document - site assessments to address the issue of the wildlife value of brownfield sites; and
- Land Allocations - In allocating land to meet housing needs every attempt to be made to mitigate any adverse effects.

## Non Allocated Sites

### Document Section: Policy TPH2: Non-Allocated Sites

#### Nature of Response

General comment  
Support 3  
Support with conditions 1  
Objections 5

**ID and Name:** PO634 Directions Planning Consultancy; PO697 Redrow Homes (Yorkshire) Ltd; PO784 Roger Lee Planning Ltd; PO304 WYAAS; PO290 David Storrie Associates; PO953 Friends of The Earth (Calderdale); PO545 Shibden Valley Society; PO404 Philip S. Ryley & Co.LLP; PO81 English Heritage

#### Summary of comments

Policy TPH2 was generally supported in principle with comments relating to the criteria included within the policy along with concerns that the policy in its current form would not provide a mechanism to address oversupply as has occurred in the past:

- Criteria for assessing non-allocated sites including greenfield sites supported;
- Policy TPH2 simply repeats the NPPF or else overlaps with other Policies in the Plan, such as CP8 and should be deleted because it adds nothing to the meaning of the Plan;
- Wording of criterion 7 needs to be amended to more closely reflect national policy guidance and include reference to other heritage assets and their settings as opposed only to listed buildings; and
- Clearer definition of targets is required to avoid over supply. Additional wording and bullet points suggested to make the policy more closely related to the housing target and objectives of the Plan.

#### Actions

The actions resulting from representations to this policy concern amendments to the wording of the criteria contained in the policy.

- The suggested amendments to criterion 7 to be incorporated into the Plan; and
- Consideration to be given to the suggested amendments relating to more clearly defining the relationship between this policy and the overall housing target.

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## Provision of Good Quality Residential Developments - Density

### Document Section: Policy TPH3: Residential Density (including Paragraphs 19.6, 19.7 & Table 19.4)

#### Nature of Response

General comment 2  
Support 8  
Support with conditions 4  
Objections 8

**ID and Name:** PO428 Yorkshire Wildlife Trust; PO635 Directions Planning Consultancy; PO698 Redrow Homes (Yorkshire) Ltd; PO785 Roger Lee Planning Ltd; PO426 METRO; PO330, PO331 Procter; PO954, PO955 Friends of The Earth (Calderdale); PO890, PO892 David Wilson Homes; PO889, PO891 Barratt Homes; PO155, PO156 Highways Agency; PO406 Crosslee plc; PO83 English Heritage; PO291, PO292 David Storrie Associates; PO514 Tattersall; PO945 Whitwam; PO546 Shibden Valley Society

#### Summary of comments

Comments ranged from not wanting the density figures set out in Table 19.4 at all to views that they were too low resulting in a greater land take:

- The principle of using higher densities as a starting point in considering proposed new housing development is welcomed by the Highways Agency as it will make it easier for transport providers to deliver more attractive public transport services that are financially viable and sustainable. This, in turn, will help to reduce reliance on the car and negative impacts on local roads and the Strategic Road Network. It will also make travel planning initiatives like car sharing less difficult to deliver;
- Metro support higher density development in areas that have good public transport accessibility. Sites located close to the core bus network and rail stations should be built to high densities. Consideration also has to be given to capacity on the public transport network. Developers need to help mitigate the impact of their developments on the public transport network where there are capacity constraints both in the immediate area and on route to the final destination;
- The density standards are out of date and unnecessary. Table 19.4 should therefore be deleted. The criteria in Policy TPH3 are appropriate in their own right and without need for Table 19.4;
- Housing density ratio of 50 dwellings per hectare in Hipperholme is considered an appropriate target in this location;
- Support the provisions of this Policy. It is essential that provision is made within the Policy to enable the densities shown in Table 19.4 to be varied in those circumstances where lower densities would help to ensure that the character of the surrounding area is safeguarded or that the new development better integrates with its surroundings;
- The biodiversity value of the site should also be taken into consideration. Sites with a high value may require lower density housing to reduce the impacts;
- Object to this policy and consider the density range too high and prescriptive. Topography and infrastructure constraints need to be taken into account and specifically referenced in any density policy. A number of sites will deliver half of what is expected due to topography/infrastructure issues.
- Welcome the fact that the Council aims to balance the efficient use of land and the provision of high quality residential development but consider the proposed density requirements will not meet this aim;
- Object to the reduction in densities in most categories for sites larger than 2 ha and to proposals that net densities in 'rural areas' be set as low as 35/32/26 dwellings per hectare;
- Support provision of a local density target to replace the national approach lost in NPPF; and
- All the reasons set out as exceptions are the very reason why density policies do not work and the policy should be deleted.

## Actions

- Core Strategy - Consideration to be given as to what extent to include Table 19.4 in the Publication version given this level of background detail is more appropriate to the Preferred Options stage than the Publication stage, whilst retaining information on indicative densities for forward planning purposes without which it would be impossible to calculate the amount of land required to be allocated; and
- Land Allocations document - more detail to be provided on indicative densities reflecting site size and location as well as local factors.

## High Quality Housing

### Document Section: Policy TPH4: High quality housing

#### Nature of Response

General comment  
 Support 2  
 Support with conditions 2  
 Objections 5

**ID and Name:** PO636 Directions Planning Consultancy; PO699 Redrow Homes (Yorkshire) Ltd; PO414 DPP; PO690 Friends of The Earth (Calderdale); PO896 David Wilson Homes; PO895 Barratt Homes; PO305 WYAAS; PO84 English Heritage; PO547 Shibden Valley Society

#### Summary of comments

Concerns largely relate to the imposition of additional burdens on developers.

- There is no planning policy requirement for the Council to set minimum standards for the size of dwellings in the private housing stock, especially as the Council has not assessed the impact of the requirement on house prices and, therefore, affordability. Such matters should be left to market demand;
- Policy TPH 4 may be hard to operate but reflects reasonable aspirations;
- Object to the overly prescriptive minimum space standards in Policy TPH4. The space standards are based on the minimum space standards in the London Interim Housing Guide (August 2010). These standards are not comparable to Calderdale district and any standards should be used as a guide rather than a prescriptive minimum standard;
- House builders have ranges of market tested house types of varying sizes that they only build because they know households will buy and live in them. The house types that developers build are continually changing to reflect the current market. Therefore essentially the market dictates the house sizes;
- Support the recognition that the requirement for a 30% improvement to the energy efficiency of existing residential properties may be relaxed where this can be demonstrated to be inappropriate or not feasible. There may well be circumstances where the measures necessary to deliver the required improvement in energy efficiency would be incompatible with the appropriate conservation of the special interest of a historic building. Amended wording suggested;
- Agree all new housing developments should be of a high standard of design but policy is over specific and increases the burden on developers and further constrains the ability of a developer to provide a range and choice of sizes of new houses to meet identified needs.
- In view of the small window sizes in modern housing developments policy should explore the opportunity to set a minimum window size; and
- Compensatory energy efficiency measures - Difficult to demonstrate how a 30% improvement could be achieved whilst the need to determine the existing energy performance of the host dwelling would be a further burden on developers.

### Actions

These centre around further justification/evidence along with the programmed visibly testing of the Local Plan:

- Further evidence in relation to appropriate house sizes;
- Viability testing of the Local Plan (to address concerns in relation to the potential impact on developers); and
- Government policy on compensatory energy efficiency measures and the current position in relation to Building Regulations to be monitored with a view taken as to whether this part of the Policy be retained.

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## Provision of of range of dwellings of varying types, sizes and prices

### Document Section: Policy TPH5: Mix of house types and sizes

#### Nature of Response

General comment 1  
Support 2  
Support with conditions 2  
Objections 7

**ID and Name:** PO963 Friends of The Earth (Calderdale); PO898 David Wilson Homes; PO903 Barratt Homes; PO548 Shibden Valley Society; PO826 Thornhill Estates; PO741 HTL Properties; PO307 Tattersall; PO637 Directions Planning Consultancy; PO700 Redrow Homes (Yorkshire) Ltd; PO807 CP Group Limited; PO818 Cockburn; PO417 DPP

#### Summary of comments

The comments ranged from considering the policy too prescriptive and leaving the type and size of houses built to the market to supporting the policy in its aims of meeting the identified and specified housing needs (as evidenced in the SHMA) of the district:

- A mix of dwelling types is generally provided on sites above this threshold and therefore the need for the particular wording of this policy is questionable. Generally the market dictates the mix of housing on individual sites. A developer will only develop a mix that they consider is appropriate and will sell in the current market. The market should dictate the housing type mix not a policy. The favourable market mix will also evolve during the course of the plan period, rendering the specific percentages of house types in table 19.7 meaningless. Any proposed house type mix should be a guide rather than a prescriptive requirement;
- Policy TPH5 may be hard to operate but reflects reasonable aspirations;
- Support the inclusion of TPH5 in the Local Plan in view of the changing demographics and the ever-increasing need for the most efficient use of housing;
- Policy TPH5 should have regard to Table 19.8 given that 90% of the properties identified as being required within table 19.8 are 1 or 2 bedroom properties;
- A larger housing requirement would increase the likelihood of meeting the identified deficient property types within the zones identified in table 19.7 including housing for elderly people aged 64-75;
- Whilst developments should seek to provide a range and choice of house types policy should not be interpreted in an overly restrictive manner. Reference to an indicative figure gives sufficient flexibility;
- The additional requirements for housing developments to meet Lifetime Homes standards and for renewable energy will have an associated cost resulting in a conflict with the approach to affordable housing and raises questions about what is to take priority;
- In relation to meeting Lifetime Homes standards and renewable energy requirements it is maintained that as with the Code for Sustainable Homes there should be a caveat that the provisions are to be met unless evidence is provided which demonstrates these requirements cannot be met;
- Flexibility needs to be built into this policy and cross referenced to other policies to allow for the cumulative costs associated with the various requirements on development sites to be dealt with collectively;
- Those properties which are built should be small terrace developments or conversions, prioritising homes for single people, the retired, and affordable starter homes for local people;
- The brownfield developments should include alongside housing, space for small scale economic activity, workshops, and shared office facilities in order to encourage sustainable local employment; and
- Support Policy TPH5 which recognises that the amount of housing suitable to meet the needs of the elderly will be increased through the positive consideration of proposals for residential development on suitable sites and where this will further speed up the delivery of sustainable, inclusive and mixed communities. The supporting text be amended to include reference to the need to consider the full range of appropriate accommodation including flats for independent living, extra care and care home facilities.

## Actions

Further work required centres around further evidencing the policy and the outcomes of the viability testing of the Local Plan:

- Explore the possibility of incorporating more detailed information from the Housing Needs Statements prepared by Housing Services;
- Viability test the Local Plan to determine whether the percentage of Lifetime Homes along with other requirements results in sites remaining viable;
- Explore the most appropriate means of providing homes fulfilling the purpose of Lifetime Homes having regard to more recent research published by the Department for Communities and Local Government;
- Ensure all sources of housing supply are reflected in the Local Plan; and
- Consideration, and subject to the level of detail included in the Publication Version generally, to be given to including further text regarding the housing needs of the elderly such as reference to the full range of appropriate accommodation including flats for independent living, extra care and care home facilities.

## Affordability

### Document Section: Policy TPH6: Affordable Housing

#### Nature of Response

General comment 1  
Support 3  
Support with conditions 5  
Objections 1

**ID and Name:** PO965 Friends of The Earth (Calderdale); PO905 David Wilson Homes; PO904 Barratt Homes; PO549 Shibden Valley Society; PO786 Roger Lee Planning Ltd; PO604 Clugston Developments; PO2 Jupiter Investments Ltd; PO824 Thornhill Estates; PO732 HTL Properties; PO1002 Whitwam

#### Summary of comments

Generally the Policy was supported with comments relating to detailed aspects of the policy wording:

- Support the Council's approach to establishing the proportion of affordable housing that can be delivered and the proposal for the viability of delivering affordable housing to be assessed at the time of the submission of a planning application;
- Do not support part of the wording of Policy TPH6 which advises that housing developments will be required to make the maximum viable contribution to the provision of affordable homes. It is maintained the proportions set out in Table 19.11 should be stated to be the maximum proportion that will be sought and the starting point for negotiation, with a lower figure being agreed in the event it is demonstrated the target figure is unviable at the time an application is submitted;
- Policy TPH6 must explicitly recognise the need for competitive returns in all developments and affordable housing provision will take into account normal costs of development and mitigation;
- TPH 6 may be hard to operate but reflects reasonable aspirations;
- Support the recognition that viability of development is an important factor in any schemes which are at the affordable housing threshold;
- A caveat must be included in the Policy to ensure that the affordable housing can be met through off-site provision if necessary;
- Do not object to the affordable housing proportions and differing thresholds relating to the 9 housing market zones contained in Table 19.11 subject to the viability on a site by site basis where necessary. This is an intelligent evidence based approach to take, which relates well to the findings of the SHMA. Make clear that the percentage requirement is the proportion of dwellings to be affordable rather than any alternative understanding e.g. percentage of development floor space;
- Proposed open-book financial appraisals appropriate only where a proposal falls short of the guideline provision in Table 19.11 and this should be made clear in the policy;
- Useful if Policy TPH6 provided some guidelines as to the tenure split of affordable housing provision or at least make reference to tenure within the Policy; and
- No need for affordable housing in Calderdale.

#### Actions

These tend to be concerned with the viability testing of the Policy and clarifications of the policy wording:

- Consideration be given to making the relationship between the first sentence of Policy TPH6 and the figures in Table 19.11 clearer;
- Consideration be given to the suggestion that it is made clear whether the proportion of affordable housing relates to the number of dwellings or floorspace;
- Consideration be given to making reference to the fact that where a development proposal meets the affordable provision in Table 19.11 a financial appraisal will be unnecessary;
- Consideration be given to the inclusion of guidelines regarding tenure split of the affordable housing provision;
- Consider including reference to off-site provision and when this may be appropriate; and
- The programmed viability testing of the Local Plan.

## Travellers

**Document Section: Policy TPH7: Meeting the needs of gypsies and travelling show people**

19

### Nature of Response

General comment  
Support 1  
Support with conditions 2  
Objections 2

**ID and Name:** PO526 Rossendale BC; PO306 WYAAS; PO85 English Heritage; PO550 Shibden Valley Society; PO1123 Environment Agency

### Summary of comments

The Policy was generally supported although amendments were requested to the wording of criterion 6 (historic environment):

- May be hard to operate but reflects reasonable aspirations;
- Supported as long as sites are not located in the Green Belt;
- Support the provision of 8 pitches for gypsies and travellers (including 1 transit pitch) and 8 pitches for travelling showpeople as this will help resolve some of the longstanding accommodation issues for members of the Gypsy and Traveller communities;
- Criterion 6 - too narrow a definition of the historic environment and the wording needs to be amended to more closely reflect national policy guidance and include reference to other heritage assets and their settings; and
- Environment Agency suggest reference to 'area at high risk of flooding including functional floodplain' be re-worded to 'sites will not be allowed in flood zone 3' to make policy clearer.

### Actions

- Amendments to criterion 6 to reflect the concerns of WYAAS and English Heritage; and
  - Consider amendments to criterion 8 to reflect concerns of Environment Agency.
-



## Document Section: Chapter 20 - overarching comments, Paragraph 20.4 & Map 20.1

### Nature of Response

General comment 4  
Support  
Support with conditions 1  
Objections

**ID and Name:** PO164 UCVR Sustainable Transport Group; PO26 Butterworth; PO354 Armstrong; PO1122, PO1114 Environment Agency;

### Summary of comments

- Following the flooding experienced in the Calder valley last year, more stringent policy for future flood risk management should be implemented.
- It is essential to reduce run off from hill tops by proper management. The Environment Agency and Calderdale Council need to do more alleviation work which could include raising the floors of houses in the flood plain where possible and preventative maintenance of drains and gullies.
- The Environment Agency has stated that the Strategic Flood Risk Assessment (SFRA) needs to be updated, particularly the maps. This can help inform any future SHLAAs.

### Actions

- The Council should consider implementing more stringent flood risk policy. Comments received as part of the Preferred Options consultation exercise will assist in this process.
- Flooding and Water Environment policies in the Core Strategy predominantly deal with new development. The Council's Drainage section and the Environment Agency are primarily responsible for maintenance and flood alleviation work. A number of projects are on-going in the moorland areas of the district such as Live Moor Learn Moor and the South Pennines Project. The impact of moorland grips is being investigated and better moorland management instigated. However, the role of the Planning System in this work is limited.
- The Council should consider if it is necessary to update the Strategic Flood Risk Assessment (SFRA). Any additional work that is carried out will be used to inform and support relevant Core Strategy policies and the Land Allocations Document.

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## Flood Risk

### Document Section: Policy TPF1: Flood risk management and Paragraph 20.6

### Nature of Response

General comment 1  
Support 2  
Support with conditions 2  
Objections 2

**ID and Name:** PO430 Yorkshire Wildlife Trust; PO861, PO967 Friends of The Earth (Calderdale); PO551 Shibden Valley Society; PO611 Natural England; PO1115, PO1116 Environment Agency;

### Summary of comments

- The inclusion of Policy TPF1: Flood Risk Management is widely supported;
- There is a need for a third policy on River Catchments;
- Policy TPF1 or the supporting text should be expanded to include requirements for developers to undertake a site specific flood risk assessment for all sites in flood zones 2 and 3, and all sites over 1 hectare in flood zone 1;

- Policy TPF1 should be stricter in terms of surface water runoff rates and the protection of flood plain storage; and
- Contributions to habitat enhancements further upstream to help reduce flood risk could also be included within this policy.

## Actions

- Further reference should be made to the benefits of Green Infrastructure provision for flood risk and water quality in this policy or the supporting text;
- The Council should consider expanding paragraph 20.6 to mention requirements for developers to undertake a site specific flood risk assessment for all sites in flood zones 2 and 3, and all sites over 1 ha in flood zone 1;
- The Council should consider setting stricter criteria in Policy TPF1 in terms of surface water runoff rates and the protection of flood plain storage; and
- The Council disagrees that there is a need for a dedicated river catchment policy as relevant criteria are already contained in Policies TPF1 and TPF2. However, it is agreed that river catchments should be specifically mentioned in the narrative text to provide a better context for the Flooding and Water Environment policies.

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## Water Environment

### Document Section: Policy TPF2: Water Environment and Paragraph 20.8 to 20.11

#### Nature of Response

General comment 1  
 Support 3  
 Support with conditions 6  
 Objections

**ID and Name:** PO222 Yorkshire Water plc; PO552 Shibden Valley Society; PO421 Sandford; PO969 Friends of The Earth (Calderdale); PO866 Calder Future; PO612 Natural England; PO1117, PO1118, PO1119, PO1120 Environment Agency;

#### Summary of comments

- The inclusion of Policy TPF2: Water Environment is widely supported;
- The Council's recognition of the importance of the Water Framework Directive (WFD) is welcomed;
- The use of Sustainable Drainage Systems should be encouraged except where it can be demonstrated that they are impractical or would present an unacceptable pollution risk;
- Policy TPF2 should refer to groundwater as well as surface water. The emphasis of the policy should also be changed from controlling pollution to preventing pollution;
- There is a need for further policies on River Catchments and the treatment of minewater; and
- Policy TPF2 could be improved by making reference to the role which tree planting and woodland creation play in improving water quality and alleviating certain types of flooding.

## Actions

- The Council disagrees that there is a need for a dedicated river catchment policy as relevant criteria are already contained in Policies TPF1 and TPF2. However, it is agreed that river catchments should be specifically mentioned in the narrative text to provide a better context for the Flooding and Water Environment policies;
- The Council should consider a policy introducing schemes to treat minewater;
- The Council should consider amending the wording of paragraph 20.10 to acknowledge that SUDS techniques are impractical in some locations;

- The Council should consider making reference to groundwater as well as surface water in Policy TPF2. The emphasis of the policy could also be changed from controlling pollution to preventing pollution; and
  - Reference to the beneficial impact Green Infrastructure can have on flood risk and the water environment should be included in the Flooding and Water Environment section of the Core Strategy. A direct reference to the benefits of increased tree cover will be added to the supporting text and reference to the benefits of all Green Infrastructure in general will be added to Policy TPF1.
-

**Document Sections: Chapter 21 - overarching comments and Paragraph 21.1****Nature of Response**

21

General comment 3  
Support 2  
Support with conditions 1  
Objections 1

**ID and Name:** PO972 Friends of The Earth (Calderdale); PO528 Rossendale BC; PO733 Lancashire County Council; PO886 Sport England; PO489 Yorkshire Wildlife Trust; PO242 Keep Roberttown & Hartshead Rural; PO355 Armstrong

**Summary of comments**

- Green Infrastructure should be managed in an holistic manner. This should include collaborative working with other organisations and cross-boundary working with other local authorities;
- Whilst general support is shown for the Green Infrastructure policies in the Core Strategy, further policies should be included on Local Wildlife Sites and habitat networks. Sport and the important role this plays in Green Infrastructure should also receive policy support;
- The Council's aspiration to develop and protect a network of Green Infrastructure is supported. Wildlife Corridors and Green Infrastructure should be enhanced, maintained and protected; and
- Ecosystem services should be referred to when setting the context for Green Infrastructure policies.

**Actions**

- Green Infrastructure should be managed in an holistic manner. The Council should therefore consider adding reference to cross-border issues relating to Green Infrastructure which will be considered under the Duty to Co-operate;
- The Council should consider the inclusion of specific policies on wildlife/biodiversity in the Core Strategy; and
- Ecosystem services should be referred to when setting the context for Green Infrastructure policies.

**Document Sections: Policy TPNE1: Define a hierarchy of green infrastructure (including Table 21.1)****Nature of Response**

General comment 3  
Support 4  
Support with conditions 2  
Objections 1

**ID and Name:** PO432, PO433 Yorkshire Wildlife Trust; PO974 Friends of The Earth (Calderdale); PO553 Shibden Valley Society; PO613 Natural England; PO1088 Environment Agency; PO869 Sport England; PO494 WYAAS; PO387 Sandford; PO350 Tattersall

**Summary of comments**

- Calderdale already meets the targets set relating to access to woodland and should increase these accordingly;
- Whilst the inclusion of a policy which seeks to define the hierarchy of Green Infrastructure within the borough is widely supported, concerns have been expressed regarding the release of under-utilised assets. As a minimum, additional criteria are needed to set out how sites that do not meet current needs will be determined. The release of sites should be seen as a last resort;
- Formal sport and the important role this plays in Green Infrastructure should receive policy support;
- The Council should consider updating its Biodiversity Action Plan before the Land Allocations document is completed; and
- The outcomes of Policy TPNE1 should also include that strategic green infrastructure needs are identified and mapped.

## Actions

- The Council should consider revising its Access to Woodland Standards upwards if evidence shows that Calderdale's current performance exceeds existing targets;
- Reference should be made to formal sport/recreation when defining a hierarchy of Green Infrastructure.
- The Council should consider updating its Biodiversity Action Plan;
- The Council should consider removing the point relating to the release of Open Space sites or provide additional criteria setting out how such sites will be identified; and
- The Council should consider mapping any Strategic Green Infrastructure needs that are identified.

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## Document Sections: Policy TPNE2: Identify the functional role of green infrastructure

### Nature of Response

General comment 1  
Support 3  
Support with conditions 5  
Objections 2

**ID and Name:** PO454 Yorkshire Wildlife Trust; PO975 Friends of The Earth (Calderdale); PO554 Shibden Valley Society; PO653 Natural England; PO1089 Environment Agency; PO870 Sport England; PO398 Sandford; PO1063 Lambert; PO731 Midgley; PO505 Firman; PO173 Marshall

### Summary of comments

- The inclusion of a policy which seeks to identify the functional role of Green Infrastructure is widely supported;
- The Council's aspiration to better manage woodland is supported. Whilst increasing tree cover in the district is important, managing woodland should be seen as a priority;
- Calderdale already meets the targets set relating to access to woodland and should increase these accordingly.
- A wider variety of habitats should be considered when setting Green Infrastructure delivery targets;
- Whilst the reference to informal sports and recreation is welcomed, Policy TPNE2 also needs to provide policy support for formal sport. Further, Sport England should be acknowledged as a statutory consultee; and
- The evidence base is incomplete and out of date in terms of the Open Space, Sport and Recreation Study and the Playing Pitch Strategy. These documents are out of date and prevent policy TPNE2 being implemented as planned.

## Actions

- The Evidence base is currently being updated with a revised Playing Pitch Strategy and Open Space Study which will assist in identifying the functional role of Green Infrastructure;
- The Council should consider revising its Access to Woodland Standards upwards if evidence shows that Calderdale's current performance exceeds existing targets;
- Clarification needs to be provided that woodland management involves more than tree planting;
- The Council should consider the inclusion of indicators and targets for wildlife habitats in addition to woodlands; and
- Reference should be made to formal sport/recreation when identifying the functional role of Green Infrastructure. The role of Sport England as a statutory consultee should also be mentioned.

**Document Sections: TPNE3: Securing green infrastructure provision (including Table 21.3)****Nature of Response**

General comment  
Support 3  
Support with conditions 6  
Objections 2

**ID and Name:** PO455 Yorkshire Wildlife Trust; PO506 Firman; PO978 Friends of The Earth (Calderdale); PO555 Shibden Valley Society; PO656 Natural England; PO1090 Environment Agency; PO881 Sport England; PO407 Sandford; PO1064 Lambert; PO734 Midgley; PO813 CP Group Limited

**Summary of comments**

- Whilst the inclusion of a policy which seeks to secure Green Infrastructure provision is widely supported, reference should be made in Policy TPNE3 to Community Infrastructure Levy and specific GI projects and sites should be identified through the Infrastructure Delivery Plan;
- Clarification is requested with regards to the means by which the Council will; "Encourage the protection, enhancement and creation of green infrastructure within the development management system."
- A wider variety of habitats should be considered when setting Green Infrastructure delivery targets;
- Whilst the strong commitment this policy makes to the protection of ancient woodland and veteran trees is welcomed, Calderdale already meets the targets set relating to access to woodland and should increase these accordingly;
- Policy TPNE3 should include a target for increasing the overall provision of green infrastructure in the district each year to 2021; and
- The evidence base is incomplete and out of date in terms of the Open Space, Sport and Recreation Study and the Playing Pitch Strategy. These documents are out of date and prevent policy TPNE3 being implemented as planned.

**Actions**

- Reference should be made in Policy TPNE3 to Community Infrastructure Levy. Further, the Council is currently working on the Infrastructure Delivery Plan. Much of the detail of how the Council will secure Green Infrastructure provision will be determined during this work and will be published in due course;
- The Council should consider revising its Access to Woodland Standards upwards if evidence shows that Calderdale's current performance exceeds existing targets;
- The Council should consider the inclusion of indicators and targets for wildlife habitats in addition to woodlands;
- The Council should consider including a target for increasing the overall provision of green infrastructure in the district each year to 2021; and
- The Evidence base is currently being updated with a revised Playing Pitch Strategy and Open Space Study which will assist in securing Green Infrastructure provision in the district.

**Document Sections: Policy TPNE4: A joined up green infrastructure network (including Table 21.4)****Nature of Response**

General comment 1  
Support 5  
Support with conditions 3  
Objections 3

**ID and Name:** PO456 Yorkshire Wildlife Trust; PO507 Firman; PO979 Friends of The Earth (Calderdale); PO556 Shibden Valley Society; PO657 Natural England; PO1091 Environment Agency; PO883 Sport England; PO412, PO415 Sandford; PO1065 Lambert; PO736 Midgley; PO346 Tattersall

## Summary of comments

- The inclusion of a policy which seeks to facilitate a joined up Green Infrastructure network is widely supported. Specific support is given to the connection of biodiversity habitats, the provision of long-term security for critical biodiversity assets and the connection of urban and rural communities through green travel routes;
- Policy TPNE 4 should make specific reference to Wildlife Corridors;
- Policy TPNE4 should be fully considered during preparation of the Land Allocations document;
- A wider variety of habitats should be considered in relation to indicators and targets. Also, references to 'accessible woodland' should be replaced with 'accessible natural greenspace' with more appropriate and established accessibility targets such as ANGST used;
- Reference should be made to protecting as well as extending access to the Green Infrastructure Network; and
- Calderdale already meets the targets set relating to access to woodland and should increase these accordingly.

## Actions

- The Council should consider changing references to accessible woodland to accessible natural greenspace. The Council should also consider if it would be more appropriate to base targets on ANGST;
- The Council should consider revising its Access to Woodland Standards upwards if evidence shows that Calderdale's current performance exceeds existing targets;
- Policy TPNE4 will be fully considered during preparation of the Land Allocations document;
- Specific reference should be made to Wildlife Corridors in policy TPNE4 and/or supporting text; and
- Reference should be made to protecting as well as extending access to the Green Infrastructure Network.

## Pollution Control

### Document Sections: Policy TPEP1: Pollution control

#### Nature of Response

General comment 1  
Support 3  
Support with conditions 1  
Objections 2

**ID and Name:** PO557 Shibden Valley Society; PO980 Friends of The Earth (Calderdale); PO766 Green Watch/Residents Group/Road Safety Committee; PO188 Ryle; PO21 Enviro Ltd; PO1087 Environment Agency; PO658 Natural England

#### Summary of comments

- The inclusion of a policy on Pollution Control is widely supported;
- Consideration should be given to the designation of a new Air Quality Management Area (AQMA) at Brookfoot Lane, Brighouse due to dust and emission issues;
- Policy TPEP1 should be amended so that the potential for pollution to have an adverse impact on bio- and geological diversity is considered;
- Bullet point three of Policy TPEP1 is inconsistent with NPPF paragraph 123 which indicates that in respect of health the issue is one of avoiding "significant adverse impacts." The test applied in this policy in respect of health does not accord with national policy; and
- Noise pollution is one aspect of Pollution Control that has the potential to have a big impact on the quality of people's lives.

#### Actions

- The Council should consider amending Policy TPEP1 so that the potential for pollution to have an adverse impact on bio- and geological diversity is considered.

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## Environmental Protection

### Document Sections: Policy TPEP2: Environmental Protection

#### Nature of Response

General comment  
Support 3  
Support with conditions  
Objections

**ID and Name:** PO53 The Coal Authority; PO558 Shibden Valley Society; PO981 Friends of The Earth (Calderdale)

#### Summary of comments

The inclusion of a policy on Environmental Protection is widely supported.

**Actions** No further action

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## Generation of renewable and low carbon energy

**Document Section: Policy TPRE1: Renewable and low carbon energy (including Paragraphs 23.1 to 23.3)**

### Nature of Response

General comment 4  
 Support 1  
 Support with conditions 6  
 Objections 8

**ID and Name:** PO525 Rossendale BC; PO457 Yorkshire Wildlife Trust; PO559 Shibden Valley Society; PO982 Friends of The Earth (Calderdale); PO661 Natural England; PO523 McCarthy & Stone (Developments) Ltd; PO907, PO909 David Wilson Homes; PO906, PO908 Barratt Homes; PO829 Thornhill Estates; PO743 HTL Properties; PO495 WYAAS; PO638 Directions Planning Consultancy; PO701 Redrow Homes (Yorkshire) Ltd; PO427 Sandford; PO332 Procter; PO816 CP Group Limited; PO740 Manchester Airport

### Summary of comments:

- The main reference to Calderdale's 40% carbon reduction target should be made in section 8 on climate change;
- The council should consider how to address the fact the residents living close to a wind farm or single turbines experience negative impacts whilst much of the economic advantage vests with the developer or owner of the facility;
- Calderdale should develop a policy that places restrictions on the development of turbines etc which are close to other properties;
- Agreement that it is important to consider a range of renewable energy technologies, which should include wood fuel, especially if the emphasis is on smaller locally based schemes;
- Wood fuel operations would benefit woodland owners, helping to deliver economic, environmental and social benefits from their woods to society;
- The cumulative impacts from single wind turbines should also be taken into consideration as well as wind farms;
- Support for the consideration of cumulative impacts and the impact on landscape and biodiversity;
- Heritage assets should also be included with landscape and biodiversity;
- There are many potential problems associated with on-site renewable energy generation;
- Suggestion that the thermal efficiency of the fabric / construction of the building is a more sustainable option than an insistence on renewable energy generation, especially as this area of policy is continually evolving at national level and is moving towards a Fabric Energy Efficiency Standard;
- Recommend that what is most important is the implementation of carbon mitigation measures in developments and not how this carbon reduction is achieved;
- The Council's insistence for on-site renewable energy generation is an overly prescriptive approach to the application of the Code for Sustainable Homes and overlooks the benefits provided by other proven and approved approaches to carbon mitigation;
- The requirements set out in the policy will be costly and will place a significant financial burden on the development industry;
- Robust evidence is an essential pre-requisite for any local standards of building sustainability in advance of those set by the Building Regulations;
- We consider that the deliverability of this policy needs to be much better researched and considered in line with the other local plan requirements;
- We support the use of renewable energy technologies under Policy TPRE1, provided that proposals demonstrate that any potential harmful impacts can be satisfactorily mitigated;
- The policy should refer to 'wind farms' or 'wind turbines';
- It is welcome that the definition of areas of search should take into account the impact on biodiversity and the landscape and the cumulative impact of single turbines;
- Unable to support the policy as concerned over the potential proliferation of small turbines, and of major wind farm proposals on the plateau around Shibden Valley;
- Oppose the way the Council has simply carried forward Policy ENV5 of the RSS in terms of the decentralised renewables and low carbon targets. And object to the Policy on the basis that it is out of date and not based upon local evidence;

- Support the inclusion of this policy and its identification of the amount of renewable energy to be delivered by the end of the plan period;
- The adverse impact that wind turbines can present to aviation and air traffic systems is not currently acknowledged and due to the potentially significant implications of this, awareness of this issue should be raised through the supporting text and the policy to help ensure that appropriate processes are followed;
- Whilst there is no statutory requirement to consult the Safeguarding Authority for Manchester Airport (Manchester Airport), it is recommended that it would be generally good practice to consult when the development is close to the safeguarded area to enable safeguarding assessments to be carried out;
- Object to the Council's approach to meeting requirements for Renewable Energy as it is unclear what would take priority in the event there are viability issues with the delivery of a scheme;
- The policy should incorporate some flexibility in order to avoid a detrimental impact on the viability of a development; and
- The policy should be linked with policy CP13 'Sustainable Design and Construction'.

**Actions:**

- The concerns over the impacts on viability will be addressed through the viability assessment of the Local Plan;
  - The cumulative impacts of wind farms and single wind turbines will be informed by studies carried out;
  - Amend the policy to address concerns over priorities - e.g. Renewable and Low Carbon energy, Affordable Housing, Lifetime Homes etc.
  - Review the national policy direction; and
  - Review links and consistency with policy CP13.
-

## Historic Environment

### Document Sections: All comments

#### Nature of Response

General comment 2  
 Support 3  
 Support with conditions 3  
 Objections 7

**Name and ID:** PO27, PO28 Butterworth; PO243, PO245 Keep Roberttown & Hartshead Rural; PO496, PO504 WYAAS; PO86, PO87, PO88, PO90, PO91, PO92, PO93 English Heritage; PO983 Friends of The Earth (Calderdale); PO560 Shibden Valley Society;

#### Summary of comments

A significant number of comments were received in relation to the Historic Environment section of the Plan, the majority commenting directly on Policy TPHE1: Protect and Enhance the Historic Environment. General criticisms included that the policy should be placing a greater emphasis on the aspects of the local historic environment that give Calderdale its distinct character which the Council will seek to preserve (but which may not actually be protected as designated heritage assets). Also that it should set out a more positive strategy for the conservation and enjoyment of the historic environment in line with the NPPF.

Specific proposed improvements to the policy include:

- References to 'New development' should be replaced by 'development proposals' to cover all forms of application;
- Include reference to the 'settings' of assets;
- Any proposals in or affecting a Conservation Area should preserve or enhance those elements which contribute to its special architectural or historic interest;
- Where a significant development affects a Conservation Area where an appraisal is not in place then the Council will in advance prepare a development brief which the scheme should respond to;
- The Policy should set out a requirement that the important buildings and structures listed in paragraph 3 of the policy are actually conserved, not just have 'special regard to';
- Class II archaeological sites are sufficiently important to warrant preservation in-situ and reference should be included in the policy;
- Well preserved historic landscapes should be referenced;
- Add in reference to the creation of a local list of heritage assets;
- Any assets that are removed from the heritage at risk list are done so by positive means, with an attempt to secure a sustainable future prior to loss of an asset;
- Development proposals that potentially may affect a heritage asset should require the preparation of a heritage statement or archaeological evaluation (as appropriate);
- Ensure that all archaeological remains are covered by the policy, not just those within the historic cores of Calderdale's settlements;
- Clarify the actual approach which should be taken to archaeology and that investigation and evaluation is not only necessary where destruction of archaeological remains is likely;
- Make clear that policy requirements apply to development outside, but immediately adjacent to, the district with equal vigour as those within the borough boundary;
- Calderdale's policy on Listed Buildings overrides that of addressing climate change, policy should be amended to correct this; and
- Reference to the wider benefits, public understanding and enjoyment of the historic environment and consideration of these aspects in decision making.

#### Actions

- Consider the amendment/clarification of wording in Policy TPHE1 to address the issues raised.

## Area Based Policies

### Document Sections: Chapter 25 - overarching comments

#### Nature of Response

General comment 3  
Support 1  
Support with conditions  
Objections

**ID and Name:** PO922 David Wilson Homes; PO910 Barratt Homes; PO1121 Environment Agency; PO662 Natural England;

#### Summary of comments

A number of overarching comments regarding the area policies were made:

- Include table outlining the proposed distribution of housing within individual settlements;
- Protection and enhancement of the environment should be mentioned in all Area sections; and
- Consider flood risk issues should be raised in all area policies.

#### Actions

- The Council will consider whether an additional housing distribution table at this point would assist the presentation of the document; and
- The issues of flood risk and water quality should be discussed in each area based policy section. Enhancement of the environment should also be a consistent theme in each of the policy areas. However, any issues raised in the area based policy sections should not simply involve repetition of core or thematic policy but should only be included where it can demonstrate how that policy will address flood risk and other related issues at a local level.

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## 25.1 Halifax

### Document Sections: Policy HX1: Halifax delivering the vision (including Paragraphs 25.4 to 24.24 and Table 25.1)

#### Nature of Response

General comment 10  
Support 3  
Support with conditions 9  
Objections 6

**ID and Name:** PO458, PO459, PO460 Yorkshire Wildlife Trust; PO429 METRO; PO333, PO334, PO335, PO341 Procter; PO58 Bradley; PO984, PO985, PO986, PO987, PO988 Friends of The Earth (Calderdale); PO508, PO510 WYAAS; PO94, PO95, PO96 English Heritage; PO561 Shibden Valley Society; PO935 David Wilson Homes; PO933 Barratt Homes; PO236 SustainEnable Ltd; PO579, PO580, PO581 Coal Pension Properties; PO157 Highways Agency; PO1073 B N P Paribas Real Estate.

#### Summary of comments

Policy HX1 and the background paragraphs elicited both support and objection on a number of issues. These are summarised below:

- Support for the level of growth, areas of growth proposed and types of infrastructure project discussed;
- Object to the possibility that a significant proportion of the new housing may be within the Green Belt;
- Concern over the amount of development distributed to Halifax (48% of housing) with more being distributed to Brighouse and Elland;

- The vision is not considered to be sufficiently focused and recommended that these parts should be removed from the policy;
- Recommend a masterplan for the town centre;
- Support for strengthening and expanding the town centre offering in Halifax providing it compliments, rather than competes with, the existing offer of the town centre;
- Need to ensure that the different settlements are kept separate to ensure they retain their identity;
- Support for the concept of improving access to the M62 from all parts of Halifax. However, there is clearly a need to be realistic and aware of the resource implications. Some commented that this statement was too generalised;
- Recommendations that specific mention be made to a number of historic assets within the Halifax area;
- Recommend changing the policy to read 'The environment and heritage assets of the area will be protected, and wherever possible, enhanced';
- We would like to see important habitat corridors/GI networks included within the maps, more emphasis on connecting habitats and targets relating to biodiversity/green infrastructure included; and
- A number of potential sites were raised which will be given due consideration within the Land Allocations document.

## Actions

The comments made have resulted in a number of actions being identified. These main actions include:

- The Council will give further consideration to the proposed growth areas to ensure that impact upon existing settlements and the Green Belt is kept to a minimum and that the character of settlements is retained;
- The Council will undertake further work prior to the next stage of the Core Strategy in an attempt to identify a larger supply of developable non-Green Belt sites;
- The issue of a masterplan for the town centre will be given consideration;
- The policy will be amended as appropriate;
- The retail figures will be updated as the Core Strategy develops; and
- The Council will continue to work with infrastructure providers and the local community to identify suitable realistic infrastructure solutions for the amount of development proposed.

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## Document Sections: Policy HX2: Halifax town centre (including Paragraph 25.28 and Table 25.2)

### Nature of Response

General comment 2  
 Support 3  
 Support with conditions 3  
 Objections

**ID and Name:** PO461, PO462 Yorkshire Wildlife Trust; PO431 METRO; PO336 Procter; PO511 WYAAS; PO97, PO98 English Heritage; PO582 Coal Pension Properties;

### Summary of comments

The comments on this policy whilst limited were generally supportive of the policy stance being taken, particularly with regards improvements to the Piece Hall and other historic assets. A summary of other comments include:

- Replace "Preserve and enhance key historic buildings..." with "Preserve and enhance key heritage assets..." as the commentator considers this a more encompassing term;
- Ensure that new retail development comes forward in a way which does not detract from but compliments the existing retail offer in Halifax; and
- Like to see enhancements which link to the wider habitat network included within these areas and targets for enhancements to biodiversity.

## Actions

- The wording of the policy will be amended in light of the comments made.

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## Document Sections: Policy HX3: North Halifax (including Paragraphs 25.29 to 25.33 and Table 25.3)

### Nature of Response

General comment 6  
Support 24  
Support with conditions 2  
Objections 5

**ID and Name:** PO461, PO462 Yorkshire Wildlife Trust; PO42, PO43, PO44, PO45 Bates; PO382 Philip S. Ryley & Co.LLP; PO337 Procter; PO909 Friends of The Earth (Calderdale); PO1036 J Gallagher; PO1037, PO1038 Z Gallagher; PO1039 M Gallagher; PO1044 F Gallagher; PO668 Broadley; PO435 METRO; PO82 Merrick; PO950 Crowther; PO962 Wadsworth; PO1047 P Taylor; PO1029 NE Taylor; PO1028 P Taylor; PO1032 M Taylor; PO1033 L Taylor; PO1026 Luders; PO1027 Horsfield; PO1030 Haw; PO1031 Jepson; PO1034 Baxter; PO1035 Waller; PO1040 Easton; PO1041 Cheslett; PO1042 Sweeney; PO1043 Carter; PO1045 Bostock; PO1046 Julien; PO179 Congreve

### Summary of comments

Of those commenting on this policy the majority were supportive, however there were some objections. The comments can be summarised as:

- Consider the amount of growth proposed for North Halifax to be excessive;
- Consider infrastructure, particularly local roads, insufficient to cope with scale of development proposed;
- Growth must not however be achieved at the expense of the green spaces and environment of North Halifax;
- Need to ensure settlements within the area are not merged together;
- In recent years, there has been substantial new development of housing for sale in North Halifax - particularly along and near the Ovenden/Keighley Road. NHP would want future development to continue the tradition of mixed neighbourhoods, which is particularly marked in Ovenden. We are conscious that the significant brownfield sites that are available for housing, may not be where developers feel there is a market for family housing for sale;
- We would argue that Illingworth, Ovenden, and Mixenden should be viewed in spatial terms as Neighbourhoods;
- New school required;
- Welcome the proposals to improve the connectivity and particularly the inclusion of (transport) HUB at this location (linked to the development of new housing);
- Need to protect Green Belt, other sites such as Council owned land should be considered first;
- Support the north Halifax area of growth and the opportunities it allows for development and extending existing built up areas. The SHMA identified these areas as requiring additional quality housing of various sizes and there is adequate infrastructure in place to justify development;
- Support the initiative to create a masterplan for North Halifax;
- Objections to specific sites - these will be considered within the Land Allocations document; and
- Like to see enhancements which link to the wider habitat network included within these areas and targets for enhancements to biodiversity.

## Actions

- Through the Council's Infrastructure Delivery Plan and possible introduction of the Community Infrastructure Levy (a development tax) the Council are considering ways to fund the infrastructure required to facilitate new development;

- The Council will continue to work with infrastructure providers and the community to identify realistic improvements to infrastructure within the area; and
- The Council are actively trying to minimise development within existing Green Belt areas and will be seeking to ensure brownfield sites are developed first, wherever possible. Further work will be carried out prior to the next stage of the Core Strategy to identify a larger supply of developable non-Green Belt sites.

## 25.2 Brighouse including Rastrick and Hipperholme

### Document Sections: Overarching comments

#### Nature of Response

General comment 12  
 Support 19  
 Support with conditions 1  
 Objections 17

**ID and Name:** PO23 Dewhirst; PO57 Parker; PO356 Drayton; PO223 Armitage; PO165 Asquith; PO838 Bailey; PO850 Basford; PO238, PO235 Baslington; PO1019 Bentley; PO231 Clifton Action Group; PO218 Blagbrough; PO176 Bottomley; PO1009 Brereton; PO1016 Broadbent; PO712 Burkinshaw; PO59 Brighouse Road Safety Committee; PO186 C Davies; PO765 Green Watch/Residents Group/Road Safety Committee; PO31 Fraser; PO224 Frearson; PO1005 Holmes; PO1011 Holroyd; PO1006 Ibberson; PO1014 J Jessop; PO1021 Jennings; PO201 Kirton; PO210 Lawton; PO55 Lewis; PO672 McAllister; PO1012 Pilicano; PO1013 R Jessop; PO991 Friends Of The Earth (Calderdale); PO517 Roberts; PO1017 Robson; PO221 Shooter; PO99 English Heritage; PO35 Standeven; PO200 Stanley; PO38 Brighouse Civic Trust; PO780, PO800 Thornhill Estates; PO685 Walton; PO1015 Warburton; PO1020 Watson; PO562 Shibden Valley Society; PO1024 Yates; PO619 Clugston Developments; PO718 Crosslee plc

#### Summary of comments

Views polarised between wanting greater and lesser levels of development. Effects of development on existing infrastructure of all kinds as well as all aspects of the environment were recurring themes. Numerous references were made to specific sites in the SHLAA although these are not included in the Core Strategy. A summary of the main points follow:

- Support more houses in Brighouse particularly as will create jobs and more affordable homes;
- It is essential that Calderdale maintains its own unique character with the open green space between Calderdale and Bradford maintained and not developed;
- If green belt is released for housing builders will construct new estates in the most desirable places such as Clifton and Rastrick rather than on brownfield sites;
- In the Thornhills Lane area of Clifton there are two sites already earmarked as "potential medium term deliverables". Such development would devastate this rural part of Brighouse;
- Local infrastructure problems will arise, particularly in relation to traffic given that the M62 is often at a standstill.
- Development will impact on local flora and fauna whilst ancient boundary hedgerows would be removed;
- Greenfield breaks in the spread of Brighouse will be lost;
- Already great concern in Kirkstiles about the potential development of green belt land in the Cooper Bridge area which will add to current traffic congestion;
- Additional school places will be required but realistically funding not likely to be available;
- Will be a shortage of amenity space, already exacerbated by apartment building, notwithstanding the health benefits this brings;
- Flooding problems will be made worse as by building on all land available there is no-where for the surface water to go. Development would place an impossible strain on drains, sewers and services;
- Whilst there is opportunity for community groups to become involved in community plans there is currently not enough support to help these groups;

- There are a large number of brownfield sites rife for development which developers should be encouraged to use, including empty houses and many empty warehouse/office premises;
- Unless there is control over the type of houses built developers will simply build those most profitable for themselves;
- There are many underground streams and old mine shafts in the Brighouse Area;
- More health facilities such as doctors and dentists will be required;
- The character of the area with its opportunities for walking in the surrounding countryside including experiencing its wildfire and farm animals will be lost;
- Increased traffic levels will increase air pollution, with all the attendant health issues, in this area within which an Air Quality Management Area (AQMA) already exists;
- Whilst understanding that additional housing will become necessary it has to be carried out sympathetically with due consideration to the area itself otherwise the very attraction of living in a semi-rural area will be destroyed;
- Greater levels of housing should be planned for to accommodate needs not anticipated in the plan and to allow a rapid response to changes in circumstances;
- Policy B1 should recognise scope for increased amounts of floorspace which may be identified by future updated retail capacity assessments in order to allow the policy to be flexible;
- The effects on population density should be considered;
- Road safety for pedestrians and cyclists should be considered;
- Effects on the landscape and environment should be considered;
- The Rastrick area cannot sustain the level of housing development proposed;
- Rastrick is anticipated to take a disproportionate share of the area's employment floorspace, both office/light industry and industry/warehousing;
- Area offers a vital and well-used leisure corridor for the population of Clifton and Brighouse with walkers, cyclists, horse-riders and runners using the area regularly and in great numbers;
- The identity of individual settlements within the Area would be threatened by development;
- Support the development of the sites along the A58 as these are easily accessed from the M62 and have good links to both Halifax and Brighouse;
- The option of re-opening a local railway station, such as Hipperholme, Lightcliffe or Norwood Green would help ease local transport issues;
- Brighouse should deliver more than the 20% (2,100 dwellings) of the housing requirement set out in the Plan;
- General Objection to the Green Belt land proposals for all the Areas including Brighouse;
- Support is also given to the provision for new retail space in Hipperholme;
- The trend for unsuitable vehicles to use quiet country roads (as well as residential districts) as a 'rat run' to avoid busy junctions will be exacerbated by increased development levels;
- A new station should be built between Brighouse and Elland to draw traffic away from Brighouse town centre.
- Clifton is a historic village and this should be preserved;
- The Vision for this area should include specific reference to the intention that a sustainable use will have been found for these important buildings concentrated primarily on the settlements. Reference should also be made to the important group of heritage assets at Kirklees Park. This historic landscape was one of those previously identified in the UDP as a locally-important historic Park and contains one of the best and most important groups of medieval agricultural buildings in Yorkshire. However, five of these buildings are "at risk";
- There remain industrial units for rent and sale which should be used before new ones are built;
- There should be a 'Park & Ride' scheme that allows shoppers to park away from Brighouse town centre; and
- Three streets in the town centre of Brighouse should be pedestrianised to deter traffic: Commercial Street, Bethel Street, Thornton Square area.

## Actions

Many of the actions required to address concerns raised will come through the preparation of the Land Allocations document and the Infrastructure Delivery Plan. Actions through the Core Strategy include:

- Re-evaluating the level and distribution of housing across the district including in the Brighouse Area;



- Including specific references to heritage assets and other features found within the Area; and
- Continuing the search for brownfield sites

**Document Sections: Paragraphs 25.35 and 25.38**

**Nature of Response**

General comment 1  
 Support 3  
 Support with conditions 1  
 Objections 1

**ID and Name:** PO177 Taylor; PO410, PO411 Crosslee plc; PO465 Yorkshire Wildlife Trust; PO513 WYAAS; PO246 Keep Roberttown & Hartshead Rural

**Summary of comments**

- Support given to the inclusion of Hipperholme in the wider Brighouse Area;
- Whilst WYAAS welcomes and supports "The Area's character and identity including its natural and historic assets have been protected and enhanced" it recommends substitution of "heritage assets" for "historic assets" as (a) being more inclusive & (b) bringing the terminology in-line with that used (with definitions) in the NPPF;
- Yorkshire Wildlife Trust would like to see important habitat corridors/GI networks included within the maps. YWT have identified the area around the River Calder and Red Beck as Living Landscapes;
- YWT support the Spatial Vision in recognising that future growth can be achieved through re-using former employment sites no longer suitable and required for this purpose;
- YWT support the Vision and its aspiration to protect and enhance local natural and historic assets;
- Brighouse is grid locked at certain times of the day even without the additional problems created by motorway traffic. People seek short cuts, often through Clifton or through the Armytage Industrial Estate. Adding even more traffic through development of land along Wakefield Road or Thornhills Lane will exacerbate this congestion;
- The area around all of Clifton and Thornhills is used on a regular basis by walkers and ramblers and forms part of the Brighouse boundary walk; and
- St John's Academy is already at capacity as a primary facility and will not be able to absorb the increase in children arising from additional housing being built.

**Actions**

Many of the actions required to address concerns raised will come through the preparation of the Land Allocations document and the Infrastructure Delivery Plan. Actions through the Core Strategy include:

- Re-evaluating the level and distribution of housing across the district including in the Brighouse Area;
- Including specific references to heritage assets and other features found within the Area;
- Consider placing important habitat corridors/GI networks on the maps; and
- Continuing the search for brownfield sites.

**Document Sections: Policy B1 Brighouse including Rastrick & Hipperholme - Proposals (including Paragraphs 25.39 to 25.50)**

**Nature of Response**

General comment 14  
 Support 4  
 Support with conditions 4  
 Objections 7

**ID and Name:** PO1079 Kirklees MC; PO502, PO503 Carlton; PO466 Yorkshire Wildlife Trust; PO244, PO247, PO248, PO249, PO250 Keep Roberttown & Hartshead Rural; PO1050 Lambert; PO437 METRO; PO679 Midgley; PO413, PO416, PO420, PO422 Crosslee plc; PO779, PO787 Roger Lee Planning Ltd; PO990 Friends Of The Earth (Calderdale); PO561 WYAAS; PO100, PO101 English Heritage; PO819 CP Group Limited; PO839 David Wilson Homes; PO837 Barratt Homes; PO755 Thornhill Estates; PO618 Clugston Developments; PO158, PO159 Highways Agency;

## Summary of comments

These ranged from objecting to the proposed levels of development in Policy B1 to either agreeing with the proposals or wanting higher levels of development. Numerous comments referred to specific sites, often with a view to promoting these sites. The main points were:

- Thornhill Estates own four parcels of land, three of which lie adjacent to the settlement limits of Rastrick (which forms part of the urban area of Brighouse) and one which is located at Ainley Top, adjacent to the Local Authority boundary with Kirklees. The sites are Land South of Southages Quarry, Rastrick, Land South of Clough Lane, Rastrick and Land North of Dewsbury Road, Rastrick;
- Support given to the identification of Hipperholme as a potential growth area;
- If greenbelt land is required towards meeting the housing requirement smaller tracts of green infill sites should be used before destruction of large areas of greenbelt;
- Support to housing target in Brighouse area;
- Housing development on surplus land at Crosslee will provide opportunities to meet the housing needs of the Brighouse area during the plan period and reduce the pressure to release land located in the Green Belt;
- Kirklees Council made aware of proximity of EM42 making it suitable for office use to Kirklees residents and employers there therefore being no need for Kirklees Council to separately propose 10ha of green belt land for office use;
- The ELR should be reviewed to take into account shifts in working practice and industrial building design before additional brownfield sites are allocated whilst greenbelt land should not be used for industrial projects;
- Calderdale appears to be taking the approach of allowing Kirklees Council to deliver 6ha of B2/B8 land for Calderdale off the A641 at Cooper Bridge. Are Calderdale aware that Kirklees Council's Infrastructure Delivery Plan includes reference to a new motorway junction 24A between Brighouse and Bradley and a proposed new roundabout at Cooper Bridge utilising some land in Calderdale?
- Clarification and appropriate wording required regarding the role of Bailiff Bridge in the defined urban area of Brighouse;
- Metro will be commissioning a new station study due for completion by October 2013 which will identify locations for new stations in West Yorkshire to be delivered by end of LTP3 period. The outputs of this study will be available to feed into the council's Infrastructure Delivery Plan;
- The aspiration of resolving and improving problems associated with the highway network and provision of good quality public transport is supported;
- The council should ensure that the proposals in Kirklees and their implications for traffic levels do not preclude Calderdale from pursuing its own objectives;
- The Highways Agency confirms that work is continuing to develop a solution that will satisfy the Kirklees development aspirations, address the needs of development traffic generated in the Brighouse area and resolve operational issues at Junction 25;
- Whilst references to heritage assets are welcomed the plan should include a clear statement about Kirklees Park including reference to the fact that the Council intends to secure a sustainable future for its heritage assets along with refined wording in relation to all heritage assets, including their settings, found in this Area;
- Kirklees requests the opportunity for office development in and on the edge of Huddersfield town centre to be specified as a factor in the sequential test and be taken into consideration before out of centre office proposals are permitted;
- Object to level of Green Belt land take;
- Distribution of housing be altered so that Brighouse and Elland sub areas receive an increased share and the proportion for Halifax is reduced slightly;
- Areas such as Hipperholme benefit from not being at risk from flooding, whereas there are many areas (including sites in the eastern part of the borough) which are at significant risk;

- Given that projecting retail expenditure capacity up to 2026 is notoriously difficult with any precision, it is recommended that Policy B1 recognises scope for increased amounts of floorspace which may be identified by future updated retail capacity assessments;
- Support the level of housing growth and additional employment land for industry/warehousing floorspace proposed in the wider Brighouse area including Hipperholme;
- Support enhancements for the environment as included within Policy B1 but would like to see more emphasis on connecting these habitats to the wider network in line with the NPPF; and
- The Highways Agency state that their recent modelling work has identified capacity constraints at M62 Junction 26 Chain Bar that will have an adverse effect on traffic travelling east along the A58 from Halifax and Hipperholme towards Chain Bar.

## Actions

Many of the actions required to address issues raised will come through the preparation of the Land Allocations document and the Infrastructure Delivery Plan. Actions through the Core Strategy include:

- Wording changes to reflect those suggested in the comments;
- Continuation with the Duty To Cooperate, particularly in relation to the neighbouring proposals in Kirklees; and
- Re-consideration of the housing distribution.

## Document Sections: Policy B2 Brighouse including Rastrick & Hipperholme - Delivering the vision (including Table 25.4)

### Nature of Response

General comment 3  
 Support 2  
 Support with conditions  
 Objections 2

**ID and Name:** PO467 Yorkshire Wildlife Trust; PO251 Keep Roberttown & Hartshead Rural; PO1048 Lambert; PO671 Midgley; PO424 Crosslee plc; PO615 Clugston Developments; PO102 English Heritage

### Summary of comments

- Delivering the Vision also needs to reflect the role of Neighbourhood Plans;
- Support the provision of a new rail station at Hipperholme/Lightcliffe which will further enhance the sustainability of Hipperholme as a 'Potential growth area';
- Object to point about 'Joint working with Kirklees MC in relation to employment opportunities at Cooper Bridge' as this suggests Calderdale is supporting these proposals bringing into question the Plan's intentions regarding environmental policy and particularly the protection of Kirklees Park;
- Given the significance of the group of Listed Buildings at Kirklees Park and their current condition, this Policy should include specific reference to delivering a sustainable future for these assets; and
- Monitoring Table 25.4 should include indicators and targets relating to biodiversity/green infrastructure.

## Actions

- Consideration to be given to the various additions/wording amendments suggested in the comments.

## 25.3 Elland including Greetland and Stainland

### Document Section: Overarching comments

25

#### Nature of Response

General comment 4  
Support 1  
Support with conditions 1  
Objections 4

**ID and Name:** PO41 Elland Team Parish; PO49 Bloomfield; PO233, PO234 James, PO491 Gillett; PO801, PO782, PO744 Thornhill Estates; PO992 Friends of The Earth (Calderdale); PO676 Halstead

#### Summary of comments

Some people wish for less development raising concerns over environmental impacts and pressure on infrastructure to those in favour of the levels of development proposed:

- Object to level of Green Belt release proposed and must avoid coalescence of Elland and Rastrick;
- Support the level of job growth and employment land provision proposed;
- Concerns raised over a range of matters including, infrastructure, environmental impacts, wildlife, land stability, flood risk, recreation, use of green belt land and need to consider greater use of brownfield land;
- Include a phasing policy to ensure non-green belt and brownfield sites are developed before greenbelt sites;
- Importance of a rail station for Elland emphasised;
- Organic development of settlements would place less pressure on areas like Elland;
- CIL or equivalent needed to provide essential services;
- Better to spend available money on highway improvements rather than pursue rail station for Elland;
- Some housing should be directed towards the neighbouring areas of Kirklees to relieve pressure on Elland;
- Question need for proposed number of new houses for this area;
- New development should be concentrated around Elland 'town' and possibly West Vale and Greetland but respecting the current Green Belt boundary in this area; and
- What effects would the proposed building of a J24A of the M62 have on the location of proposed employment/housing development sites within the Elland area?

#### Actions

Many of the actions required to address concerns raised will come through the preparation of the Land Allocations document and the Infrastructure Delivery Plan. Actions through the Core Strategy include:

- Further work on housing requirement and distribution; and
- Consider including phasing policy in relation to order of site release

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### Document Section: Elland Area Spatial Vision (including 25.54 to 25.59)

#### Nature of Response

General comment 2  
Support 1  
Support with conditions 2  
Objections 3

**ID and Name:** PO228, PO229 Furniss; PO49 Bloomfield; PO468 Yorkshire Wildlife Trust; PO518 WYAAS; PO103 English Heritage; PO1003 Whitwam; PO160 Highways Agency

### Summary of comments

- Expansion of Stainland will require additional services, care over the substantial parts of the village which are of architectural interest, considerable use of current green belt land whilst any new housing needs to be fully integrated into a properly functioning village centre;
- Highways Agency point out that although measures identified through their Infrastructure Studies will address most problems at M62 Junction 24 Ainley Top at 2018, traffic modelling work suggests that long peak period queues will develop on the A629 Calderdale Way southbound approach to the junction in the longer term. It is also possible that investment to improve conditions on the A629 to the north and south of the M62 could feed traffic through to Junction 24 more quickly and exacerbate conditions at the junction;
- Support for protection of heritage assets but mention of their settings also required;
- Important habitat corridors/GI networks should be included on the maps;
- The potential growth areas would link Elland with Huddersfield undermining one of the key aims of green belt policy;
- Support vision but must be inclusive of both existing and future residents to contribute to the continued growth and extension of the settlement; and
- The Potential Growth Area should incorporate the entire settlement along with land to the west towards West Vale to ensure that this can also contribute to sustainable growth.

### Actions

Many of the actions required to address concerns raised will come through the preparation of the Land Allocations document and the Infrastructure Delivery Plan. Actions through the Core Strategy include:

- Amend policy wording where appropriate; and
- Re-consider extent of potential growth areas although they will remain indicative.

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### Document Section: Policy E1: Elland including Greetland and Stainland - Proposals (including Paragraphs 25.61 to 25.70)

#### Nature of Response

General comment 8  
Support 3  
Support with conditions 2  
Objections 4

**ID and Name:** PO1080 Kirklees MC; PO639 Directions Planning Consultancy; PO469 Yorkshire Wildlife Trust; PO520 WYAAS; PO104, PO105 English Heritage; PO940 David Wilson Homes; PO940 Barratt Homes; PO338 Procter; PO1004 Whitwam; PO380 Philip S. Ryley & Co.LLP; PO47 Bloomfield; PO198 Davis; PO216 Moran; PO438, PO439, PO440 METRO

#### Summary of comments

Views range from supporting increased level of development to wanting lower levels of development in the Elland Area:

- Support development proposed for Elland but would this be sufficient to achieve a new rail station?
- Support the proposal to allow some small-scale development to take place within the green belt as this type of development is important to allow for some growth in smaller settlements to support local services;
- Given that Kirklees removed proposals at Ainley top from their Plan should such proposals remain in the Calderdale Plan?
- Support statements in relation to maintaining the quality of the environment but suggest minor word changes;

- Stainland cannot support more housing as this would destroy its character whilst facilities and services including public transport are wholly inadequate. New development of any scale would simply serve to produce commuter developments;
- A higher number of houses should be planned for in Holywell Green/Stainland;
- Whilst the level of housing for Halifax should be reduced slightly that for Brighouse and Elland should be increased;
- Kirklees requests the opportunity for office development in and on the edge of Huddersfield town centre to be specified as a factor in the sequential test and be taken into consideration before out of centre office proposals are permitted;
- Support the level of housing proposed which should be accompanied by a Green Belt Review;
- Support the level of growth identified in Elland but justification for the way in which the potential growth areas and specific employment growth areas have been identified needs to be made clearer;
- Support enhancements for the environment being included within this policy but would like to see more emphasis on connecting these habitats to the wider network in line with the NPPF;
- Metro will be commissioning a new station study due for completion by October 2013 which will identify locations for new stations in West Yorkshire to be delivered by end of LTP3 period. The outputs of this study will be available to feed into the council's Infrastructure Delivery Plan;
- The Caldervale line is a key strategic Trans Pennine route. It is unlikely that improvements to this line through journey time savings and line speed improvements can be achieved in conjunction with the introduction of new local rail stations; and
- In terms of the strategy for the management of the historic environment of this part of the plan area the priority should be to secure a sustainable future for Elland Conservation Area. Wording changes suggested to this part of the policy.

## Actions

Many of the actions required to address concerns raised will come through the preparation of the Land Allocations document and the Infrastructure Delivery Plan. Actions through the Core Strategy include:

- Consider amendments to policy wording as suggested by the representations; and
- Consider further the proposed housing distribution across the Plan area.

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## Document Section: Policy E2: Elland including Greetland and Stainland - delivering the vision (including Table 25.5)

### Nature of Response

General comment 1  
 Support  
 Support with conditions  
 Objections 1

**ID and Name:** PO470 Yorkshire Wildlife Trust; PO106 English Heritage

### Summary of comments

- English Heritage suggest that Policy E2 seventh bullet-point be amended to reflect the need to work with relevant agencies such as English Heritage to protect the character of the area and in particular to address the problems in the historic core of Elland; and
- Include indicators and targets relating to biodiversity/green infrastructure in Monitoring Table 25.

### Actions

- Amend Policy E2 bullet point 7 as suggested by English Heritage; and
  - Consider the inclusion of indicators and targets relating to biodiversity/green infrastructure in specific Area monitoring tables or whether reference in the relevant topic section of the Plan (TPNE4) suffices.
-

## 25.4 Northowram and Shelf

### Document Section: All comments

#### Nature of Response

General comment 7  
Support 5  
Support with conditions 3  
Objections 18

**ID and Name:** PO168 Beaumont; PO37 Cockroft; PO239, PO241 Foster; PO265 Hoar; PO735 Hoggard; PO271, PO268 Jagger; PO56 Parker; PO395 suddards; PO576 Tempest; PO33 Wilkinson; PO647, PO689, PO716, PO748 HTL Properties; PO563, PO564 Shibden Valley Society; PO993 Friends of The Earth (Calderdale); PO107, PO108 English Heritage; PO521 WYAAS; PO471, PO472, PO473 Yorkshire Wildlife Trust; PO441 METRO; PO262 Drake; PO264 Sellars; PO89 Crossley; PO970 Gregory Gray Associates; PO572 Threapleton; PO419 DPP; PO146 Mangeolles

#### Summary of comments:

- Unable to agree that 185 new homes in each of Shelf & Northowram will meet the stated objectives of "maintaining green areas to a high standard" and "reducing congestion in village centres". In fact exactly the opposite will be achieved;
- Recommend that important habitat corridors/GI networks included within the maps;
- Enhancing wildlife corridors could also bring other benefits such as recreational value and flood alleviation;
- Certain sites in Shelf are suitable and available for development, which would assist delivery of affordable housing, and offer environmental improvements;
- Objection to any future changes to the greenbelt in the Green Lane area of Shelf as there is insufficient infrastructure and the availability of brownfield sites in the Halifax area;
- Support the policy especially the requirement for designs to reinforce the distinctive character of the area and safeguarding Shibden Hall and the recognition of the important contribution it makes to the District.
- Certain sites and areas are not suitable for building houses, due to previous uses;
- The roads are too narrow to cope with extra traffic generated by development;
- Any new houses should be required to be built to a high specification as was the case with smaller individual properties;
- Object to the classification of Northowram as a Local Centre as it is a District Centre;
- The Potential Growth Area should be extended to include more of Northowram;
- Support from some consultees for the level of growth in Northowram and Shelf, although a greater proportion of growth should be directed to Northowram based on its status as a District Centre in the retail hierarchy;
- The policy needs to ensure that new developments are located to make best use of the existing public transport network in the first instance and make improvements to public transport infrastructure where necessary;
- Support for the reference to Green Infrastructure improvements within the policy as well as protecting and enhancing local green spaces;
- Objection to the employment land proposed for Northowram;
- Policy NS1 should support sustainable mixed use developments which provide local employment opportunities for the residents of Northowram;
- The proposed approach which does not provide any support for mixed use developments in Northowram and prioritises the development of brownfield employment sites is unsound;
- As the Core Strategy housing requirement for Northowram will have to be fully met through Green Belt release, there is an opportunity for sustainable mixed use developments to be delivered which incorporate some additional employment floorspace;
- As a Local Centre, which should provide new employment opportunities for its local residents, it is considered that support should be given to sustainable mixed use developments in Northowram which could deliver a range of employment uses as well as community and other facilities;

- Largely support the strategy specified in Policy NS1, particularly in terms of the emphasis on housing need in the area, although it is suggested that brownfield land will take preference for housing allocations; and
- Recommended that the approach to employment sites in the area is made more flexible.

## Actions

Review the policy to address the comments made on the policy, including:

- Clarify impact of new development on traffic levels;
- Review detail on area maps;
- Consider promotion of mixed use developments to increase employment opportunities;
- Review employment numbers;
- Consider redistribution of growth within Northowram and Shelf;
- Establish types of housing to be delivered; and
- Ensure the character of the area is protected.

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## 25.5 Sowerby Bridge

### Document Section: All comments

### Nature of Response

General comment 7  
Support 2  
Support with conditions  
Objections 3

**ID and Name:** PO474, PO475, PO476 Yorkshire Wildlife Trust; PO994 Friends of the Earth (Calderdale); PO109, PO110 English Heritage; PO442 METRO; PO24, PO25 Mellor; PO166 Wilkinson; PO673 PO167 Draycott

### Summary of comments:

- The area is unable to accommodate additional development, due to traffic levels, and the schools and doctors are at capacity;
- Use vacant properties first prior to building additional developments;
- Not enough consideration given to existing severe levels of traffic pollution and congestion, and the resulting Air Quality Management Area;
- A bypass is definitely required, and should be considered given the time frame of the Local Plan;
- Support for the aspiration to increase visitor numbers to Sowerby Bridge;
- Support for the recognition of the historic character of the town;
- Welcome the aim to protect and enhance the river, canal and surrounding countryside, although needs to be more emphasis on connecting these habitats to the wider network;
- Recognition of the need to build more affordable housing in Calderdale but concerned about the proposed levels of housing development in Sowerby Bridge;
- The connections to the town centre and particularly the station need to be enhanced to make use of existing facilities particularly from the Copley Valley Area;
- The area maps should include important wildlife habitats and corridors, along with Green Infrastructure networks.
- Recommend indicators and targets relating to biodiversity/green infrastructure to be included within the area monitoring table;
- Build on the success of the local Sunday markets;
- There is support in the town for developing 'Old Causey' as a Town Square which could accommodate further market stalls and be used as a site for one-off events and possibly week time parking; and
- Policy should prioritise development within the settlement area, rather than outside on green belt land.



**Actions**

- Review impact of development on existing traffic levels;
- Ensure policy supports the tourism aspirations expressed in the vision;
- Review detail on area maps; and
- Review area monitoring indicators.

**25.6 Ryburn Valley****Document Section: All comments****Nature of Response**

General comment 3  
 Support 1  
 Support with conditions 1  
 Objections

**ID and Name:** PO477, PO478, PO479 Yorkshire Wildlife Trust; PO569 Ripponden Parish Council; PO217 Watson

**Summary of comments**

Very few comments were received against the Ryburn Valley area of the plan, these included:

- Important habitat corridors/GI networks should be included within the maps, and more emphasis on connecting habitats and targets relating to biodiversity/green infrastructure should be included;
- The policy should include the need to protect, enhance and connect the habitats along the river corridor in line with the NPPF;
- Some indicators and targets relating to biodiversity/green infrastructure should be included within the monitoring table e.g. increase in BAP habitats;
- Proposed housing levels should not be increased due to previous high levels of growth in the area and significant local infrastructure issues (schools, sewage system, leisure facilities, congestion); and
- A potential site was raised which will be given due consideration within the Land Allocations document.

**Actions**

No further action is necessary as a direct result of the comments received. They are either covered by other areas of the plan or are to be dealt with through the Land Allocations document.

**25.7 Luddenden Dean, Mytholmroyd and Cragg Vale****Document Section: All comments****Nature of Response**

General comment 6  
 Support 1  
 Support with conditions  
 Objections 3

**ID and Name:** PO480, PO481, PO482 Yorkshire Wildlife Trust; PO111, PO112 English Heritage; PO995 Friends of The Earth (Calderdale); PO444 METRO; PO571, PO573 Collinge; PO706 Boom

**Summary of comments**

- The area policy should reinforce the distinctive character of the area and preserve and enhance the historic built environment in line with the other area based policies;

- Important habitat corridors/GI networks should be included within the maps, and there should be more emphasis on connecting habitats and enhancing biodiversity corridors;
- The policy should include the need to protect, enhance and connect the habitats along the river corridor in line with the NPPF;
- Some indicators and targets relating to biodiversity/green infrastructure should be included within the monitoring table e.g. increase in BAP habitats;
- New development should be located to make best use of the existing transport network in the first instance and make improvements to public transport infrastructure where necessary;
- Local public transport provision should be provided, particularly from Booth, Midgley and Luddenden to Hebden Bridge and Mytholmroyd;
- Within Hebden Royd there was concern about the lack of support for manufacturing within the proposed policy, and a specific concern regarding the lack of consideration for business parks in Mytholmroyd;
- The policy has insufficient coverage of renewable energy options in the Calder Valley including hydroelectricity;
- A general objection to the Green Belt land proposals for the area based policies; and
- A potential site for protection was raised, along with references to SHLAA sites and the specific location of proposed housing which will be given due consideration within the Land Allocations document.

## Actions

Consider amending policy wording in line with comments. Comments regarding sites will be dealt with through the Land Allocations document.

## 25.8 Hebden Bridge

### Document Section: All comments

#### Nature of Response

General comment 9  
 Support 1  
 Support with conditions  
 Objections 8

**ID and Name:** PO887, PO996 Friends of the Earth (Calderdale); PO113, PO114, PO115 English Heritage; PO483, PO484, PO485 Yorkshire Wildlife Trust; PO181, PO182, PO183 Wells; PO446 METRO; PO664 Mackay; PO161, PO163 UCVR Sustainable Transport Group; PO705 Hebden Royd Town Council; PO823, PO827 Cockburn

#### Summary of comments

- Little or no mention of leisure and leisure facilities in the Hebden Bridge Area;
- Concern over the lack of support for some employment uses in the area;
- There is not enough land available in the Hebden Bridge area to facilitate the level of development proposed in the Core Strategy. In addition, future development will place pressure on existing infrastructure in the area;
- Concern over what was felt to be an insufficient coverage of renewable energy options in the area;
- New development should be located to make best use of existing public transport infrastructure in the first instance and make improvements to that infrastructure where necessary;
- New dwellings should, in areas with topography and land supply issues, be placed on previously developed sites which have been historically used but have now returned to greenfield status. Also, existing brownfield sites should be regenerated;
- New development should not occur on land allocated as Green Belt. At the very least, new development should be prioritised within the settlement area before green belt land is used;
- Infrastructure must be maintained to support the quality of life for rural people;
- A number of potential sites and land uses were raised which will be given due consideration within the Land Allocations document;

- The distinctive character and landscape setting of the Hebden Bridge area needs further mention;
- Recommendation that important habitat corridors/GI networks included within the maps; and
- Enhancing and connecting wildlife and river corridors could bring benefits such as recreational value and flood alleviation.

### Actions

- Further reference should be made to leisure/leisure facilities in the Hebden Bridge area section;
- The Council are actively trying to minimise development within existing Green Belt areas and will be seeking to ensure brownfield sites are developed first, wherever possible. Further work will be carried out prior to the next stage of the Core Strategy to identify a larger supply of developable non-Green Belt sites;
- Through the Council's Infrastructure Delivery Plan and possible introduction of the Community Infrastructure Levy (a development tax) the Council are considering ways to fund the infrastructure required to facilitate new development;
- The Council will continue to work with infrastructure providers and the community to identify realistic improvements to infrastructure within the area;
- Housing Areas will be identified within the Local Plan, however this will be done through the Land Allocations and Designations document not the Core Strategy;
- Habitat corridors/GI networks should be identified within the Local Plan, however this will be done through the Land Allocations and Designations document, not the Core Strategy; and
- Policy wording will be amended as appropriate.

## 25.9 Todmorden

### Document Section: All comments

#### Nature of Response

General comment 12  
 Support 3  
 Support with conditions 2  
 Objections 3

**ID and Name:** PO205,PO206, PO212,PO213,PO207,PO211, PO203,PO204 Todmorden Town Council;PO486, PO487 Yorkshire Wildlife Trust; PO524 Rossendale BC; PO116, PO117, PO118,PO119 English Heritage; PO575 Kirkup; PO450 METRO; PO193 Marshall; PO40 Battye; PO998 Friends of the Earth (Calderdale)

#### Summary of comments

- Support for Policy TOD1 in terms of the level of proposed development;
- Both opposition and support for Todmorden to become a Principal Town;
- Recommendations that specific mention be made to a number of historic assets within the Todmorden area and that their importance to the area becoming a centre of heritage be recognised;
- Reference to the Todmorden Curve and the benefits of reinstating this track are welcomed;
- New development should be located to make best use of existing public transport infrastructure in the first instance and make improvements to that infrastructure where necessary;
- A number of potential sites and land uses were raised which will be given due consideration within the Land Allocations document;
- There is not enough land available in the Todmorden area to facilitate the level of development proposed in the Core Strategy. In addition, future development will place pressure on existing infrastructure in the area;
- New development should not occur on land allocated as Green Belt. At the very least, new development should be prioritised within the settlement area before green belt land is used;
- Recommendation that important habitat corridors/GI networks included within the maps; and
- Enhancing and connecting wildlife and river corridors could bring benefits such as recreational value and flood alleviation.

## Actions

- The Council are actively trying to minimise development within existing Green Belt areas and will be seeking to ensure brownfield sites are developed first, wherever possible. Further work will be carried out prior to the next stage of the Core Strategy to identify a larger supply of developable non-Green Belt sites;
- Through the Council's Infrastructure Delivery Plan and possible introduction of the Community Infrastructure Levy (a development tax) the Council are considering ways to fund the infrastructure required to facilitate new development;
- The Council will continue to work with infrastructure providers and the community to identify realistic improvements to infrastructure within the area;
- Classifying Todmorden as a Principal Town was considered as part of the Core Strategy Refined Issues and Options and received significant objection. Whilst no longer proposing Todmorden as a Principal Town, the Core Strategy Preferred Options recognises and attempts to build on the town's importance as a service centre;
- Habitat corridors/GI networks should be identified within the Local Plan, however this will be done through the Land Allocations and Designations document, not the Core Strategy; and
- Policy and vision wording will be amended as appropriate.

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## 25.10 The Moors

### Document Section: All comments

#### Nature of Response

General comment 2  
Support 3  
Support with conditions  
Objections

**ID and Name:** PO187 Ryle; PO814 Cockburn; PO488 Yorkshire Wildlife Trust; PO663 Natural England; PO719 Oldham MBC

#### Summary of comments

Whilst this section did not raise a significant amount of comments those made were supportive of the section and proposed policy for the area. Some issues were raised, however, including:

- Wind turbine developments which may affect the 'wild' character of the area;
- Access for grouse shooting should be carefully managed;
- Recommend discussions with the Yorkshire Peat Partnership concerning further improvements to the area; and
- Commitment to continued joint working through Pennine Prospects from Oldham Council.

## Actions

No specific actions for the Core Strategy were identified. The Council will, however, continue to work with partners for the improvement of the Moors area.

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## Implementation

### Document Section: All comments

#### Nature of Response

General comment 2  
Support 2  
Support with conditions 2  
Objections

**ID and Name:** PO1049 Lambert; PO675 Midgley; PO120, PO121 English Heritage; PO340 Procter; PO665 Natural England

#### Summary of comments

The following comments were made:

- Implementation should include working with local residents, communities and Neighbourhood Development Groups;
- Support the identification of English Heritage as a partner in helping to deliver that aspect of the Policy which relates to securing a sustainable future for the buildings at Kirklees Park; and
- Natural England as an ambassador for green infrastructure should be included within the responsible bodies/agencies referred to under policies TPNE1, TPNE3 and TPNE4 as well.

#### Actions

Limited actions were identified including:

- The Council note the concern around working with local residents etc. Consideration will be given to inclusion as relevant; and
- Natural England will be added to the other policies as suggested.

## Monitoring

Document Section: All comments

27

### Nature of Response

General comment  
Support  
Support with conditions 1  
Objections

**ID and Name:** PO666 Natural England

### Summary of comments

Would welcome reference not only to 'nil planning permissions granted contrary to Environment Agency advice on flooding and water quality' but also to 'nil planning permissions granted contrary to Natural England advice on biodiversity, landscape and green infrastructure'.

### Actions

The Council will consider if such targets are appropriate.

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## Appendix 1 Glossary

No comments made against this chapter.

## Appendix 2 Replaced Policies

### Document Sections: Appendix 2 Replaced Policies

#### Nature of Response

General comment 1  
Support  
Support with conditions  
Objections

**ID and Name:** PO669 Natural England

#### Summary of comments

Welcome further explanation on status of saved policies.

#### Actions

The retained policies will, where NPPF compliant, continue to be used as part of the decision making process. The Council will reconsider replacing these retained policies within the Core Strategy or Land Allocations document.

Table 4 Comments and responses on Reasons for Policies Document

ID	Name	Org. Details	Section Number	Nature of Response	Your comment	Response	Officers' Recommendation
CSR11	Tattersall		3.16	Object	We ask that pharmacies not be classified as a health facility (and therefore falling into the same category as a GP Surgery and Dentist) within the document "Modelling the Impacts of the Spatial Options". A pharmacy is widely recognised as being an A1 classification (shop). Stainland and Holywell Green have a pharmacy but no longer have a GP Surgery. A pharmacy alone cannot fulfil the role of a GP surgery. There is a danger of areas which have only a pharmacy and no GP Surgery appearing to meet this important aspect of health care (covered in the Well Being section of the Core Strategy). Alternatively, if the Council wishes to include pharmacies in this category, it should ensure that they are included only within an area that has a GP surgery.	Further action Core Strategy	This issue will be considered.
CSR12	Tattersall		Table 3.3	Object	We ask that Holywell Green and West Vale are not joined together as an Opportunity Area. Whilst we have no objection to their being assessed separately, we feel that it is incorrect to join two separate urban areas which have important Green Belt in between as one area. There is an employment site at West Vale (Black Brook Way) and a separate one at Holywell Green (Brookwoods Industrial Estate). Adding West Vale (with a higher economic and social score) to Holywell Green gives Holywell Green the incorrect appearance of having good access to services and facilities. Currently, these two joined areas appear to rank higher than Eiland.	Further action Core Strategy	The issue of joining the two employment areas is noted and this will be given due consideration.



ID	Name	Org. Details	Section Number	Nature of Response	Your comment	Response	Officers' Recommendation
CSR2	Yapp	JMP Consultants Ltd for Highways Agency	3.24	General Comment	Modelling work undertaken by the Highways Agency to inform its responses to earlier Calderdale Core Strategy consultations resulted in similar conclusions in that there was no really significant difference between the spatial options that were considered in terms of the traffic impact of the Strategic Road Network. Recent modelling work has indicated that the spatial strategy embodied in the Preferred Approach, with the slight change in balance of new housing between Brighouse and the Calder Valley has a lesser detrimental impact on the Strategic Road Network than the spatial options considered previously.	No further action	The comment is noted and the Council will continue to work with the agency to try and reduce impacts wherever possible.
CSR3	Yapp	JMP Consultants Ltd for Highways Agency	3.43	Object	The Highways Agency does not support out-of-centre office development as they generate considerable car traffic concentrated in short periods of time during the peaks and it is difficult to deliver an attractive public transport alternative to the car that can meet demand for travel from a number of surrounding communities. Town and city centres are more suited to office development as they are hubs for public transport services and therefore have much better accessibility resulting in a lower car mode share.	No further action	Whilst the comments of the Agency are understood the Council needs to ensure it provides sufficient viable employment land to support economic growth in the future. The principal location for office development within Calderdale will be Halifax town centre followed by other centres.  However the Council considers if it were to solely restrict office uses to town centres it would lose out on investment and employment opportunities. Any out of centre office development will be subject to the sequential approach.
CSR1	James		3.57	Object	I refer to 'Proposed Growth', paragraphs 3.57 & 3.58.	No further action	The reference to there being no 'show-stoppers' is used as the

ID	Name	Org. Details	Section Number	Nature of Response	Your comment	Response	Officers' Recommendation
					<p>You report that an initial survey found that the lack of infrastructure facilities would not be regarded as a 'Show stopper', although this could become an issue in the future.</p> <p>I can only take this to mean that this will become somebody elses problem in the future, because it is patently obvious to everyone living in Sowerby Bridge, that this is already a problem. and this is before the Copley development has even started.</p> <p>Should not the infrastructure problem be addressed before the proposed development, instead of seeing how it will pan out and hoping it will not result in total gridlock.</p>		<p>infrastructure providers did not identify any specific issue which would absolutely rule out development. It is recognised that there are issues with many locations across the district, however, many of these can be overcome through the provision of new infrastructure.</p> <p>The Council are working with infrastructure providers to identify solutions to some of these issues. In addition the Council is currently considering the introduction of a Community Infrastructure Levy on new developments across the district, which will help pay for new infrastructure.</p>
CSR4	Yapp	JMP Consultants Ltd for Highways Agency	3.58	General Comment	<p>The Highway Agency (the Agency) has produced an Infrastructure Study based on new modelling using an updated suite of traffic models that shows the combined impact of growth in strategic traffic and additional traffic generated by Core Strategy development proposals across West Yorkshire on the operation of the Strategic Road Network (SRN) and its junctions with the local primary road network. The findings of this work have been shared with Calderdale Council and the outputs have been used to identify schemes for inclusion in the Infrastructure Schedule that will accompany the Infrastructure Delivery Plan.</p> <p>The modelling work considered the impact of forecast traffic growth at 2018 and 2028 - the two years were chosen as providing the 'best fit' for the</p>	Further action Core Strategy	<p>The modelling will be considered within the development of the Core Strategy and as part of the Infrastructure Delivery Plan.</p>

ID	Name	Org. Details	Section Number	Nature of Response	Your comment	Response	Officers' Recommendation
CSR5	Yapp	JMP Consultants Ltd for Highways Agency	3.102	General Comment	<p>This paragraph contains the statement that "Calderdale is not expected to recover to pre-recession employment levels until 2022" and that neighbouring areas will recover more quickly. The issue here is the deterioration of the level of self-containment in terms of travel to work and the risk of an increase in out-commuting. It is desirable to try to ensure that housing and employment development proceed in balance to minimise out-commuting but it is also recognised that market forces will determine the actual pace of housing and employment development.</p>	No further action	The comments are noted and the Council aim to balance housing and employment development.
CSR6	Marshall		7.3	Object	<p>Since we do not know what the development pressures will be in the future, it is essential that Todmorden has the same Green Belt as the rest of Calderdale. We cannot rely on statements such as <i>"it is not expected that this will create development pressures which cannot be adequately dealt with"</i></p>	Further action Core Strategy	The Council are investigating whether Green Belt can replace the 'Area Around Todmorden' policy, however to do this it must fulfil the tests set out within the NPPF.

ID	Name	Org. Details	Section Number	Nature of Response	Your comment	Response	Officers' Recommendation
CSR13	Brewer		13.15	Object	<p><i>through existing development management policies"</i></p> <p>To avoid any doubts about 'expectations', Green Belt is the answer. Unless, of course, the rest of the valley would like to be "The Area Around Calderdale"; I am sure Todmorden could live with that.</p> <p>CoalPro considers there is no reason why the MSA should not include the entire shallow coal reserve and that constraints are not justified. In particular, given the significant redevelopment opportunities in Calderdale, the urban areas should be included. This will alert developers to the need to consider prior extraction.</p>	Further action Core Strategy	Further work on the methodology for identifying Mineral Safeguarding Areas will be carried out prior to the next stage of the Core Strategy.
CSR14	Brewer		13.21	Object	<p>CoalPro considers that the threshold of 5ha in urban areas is too high. There have been many examples of prior extraction in urban areas on sites much smaller than this.</p>	Further action Core Strategy	Further work will be carried out on Mineral Safeguarding Areas prior to the next stage of the Core Strategy.
CSR7	Elliott		Table 21.1	General Comment	<p>I have read Policy Option 26 and the Conservation Strategy for the Historic Environment, I do not claim to fully understand the implications of these two items, nor indeed items such as "Article 4 Directions", PPS5 etc, but would like to raise some points which have concerned me over the last few years.</p> <p>1) Current "Locally Designated Historic Parks &amp; Gardens would presumably be registered as Heritage Assets. They are currently afforded some protection by Policies BE1, BE20 and BE21. Two</p>	No further action	<p>1. In reality the new policies within the Core Strategy are not anticipated to do any more to protect LDHPG than the existing policies in the RCUDP. The developments in the specific examples referred to (Mytholmroyd Memorial Gardens and Dobroyd Castle) will have been through the planning process and the LDHPG</p>

ID	Name	Org. Details	Section Number	Nature of Response	Your comment	Response	Officers' Recommendation
					<p>LDHPG I am familiar with - Mytholmroyd Memorial Gardens and Dobroyd Castle have been subject to significant changes and do not seem to have been conserved much at all. MMG has been radically changed as part of the regeneration; Dobroyd Castle grounds have seen the installation of activity equipment in what was a planned Victorian park/garden. I do not judge these developments, rather express the opinion that LDHPG status has done little to conserve these Heritage Assets. Will the new policy/strategies realistically do more to protect them?</p> <p>2) There are presumably many buildings in Calderdale which whilst not registered as listed are/will be considered as Heritage Assets. However with the regular reform of planning regulations, many of these could be the subject of building development which does not require planning permission. How will the new policy/strategy provide any protection for them?</p> <p>3) Processing planning applications involves a check on whether a building is listed or itemised in the description. For practical reasons this does not extend to consideration as to whether a building is listed through curtilage. For owners of such buildings a development which doesn't need planning permission may be undertaken without realising they are listed. What will the new policy/strategy do to improve the protection of buildings/structures which fall within this "poor sub-status"?</p>		<p>designation will have been duly considered within the context of the decision making process.</p> <p>2. The new policies within the Core Strategy will provide protection for non-designated locally-important heritage assets (first sentence in proposed Policy TPHE 1: Protect and enhance the historic environment) once these are established, however this will only be where planning permission is required by law. The local authority has no control however on permitted development (PD) rights.</p> <p>3. Again the new policies within the Core Strategy will not address this issue of concern. The Conservation Team are not aware of any councils who have defined the curtilage for all heritage assets, partly due to resource issues but more so due to the practical reasons of definition of curtilage and potential changes in law (amendments to curtilages over time). For example case law in this area states that if a building is located within the curtilage of a larger estate, but has its own curtilage, then it cannot be classed as part of the estate for conservation purposes. Although</p>

# 100 Reasons for Policies

ID	Name	Org. Details	Section Number	Nature of Response	Your comment	Response	Officers' Recommendation
CSR10	Furniss		22.28	Object	<p>If the Stainland village were to undergo expansion then I consider various points would need to be addressed</p> <ul style="list-style-type: none"> <li>● <b>The lack of services in the village</b></li> </ul> <p>Expansion of the village will require additional services that are not available at present.</p> <p>The centre of the village is of architectural interest; as such expansion in the village seems limited.</p> <p>Development of the village would require considerable use of current green belt land with the provision of its own separate services. The development of an "island" community with its own services without integration with the old village will likely be detrimental to the sustainability of the current village.</p> <p><b>Proximity to Main centres</b></p> <ul style="list-style-type: none"> <li>● The close proximity to Elland town has to be considered in the light of the terrain between the two. Walking to Elland is a major undertaking, by only the fittest.</li> </ul>	Further action Core Strategy	<p>As per response to PO228 proposed distribution of growth will be reviewed prior to the next stage of the Core Strategy. This will be informed by the availability of land, the comments received during the consultation, and further work on the Local Plan evidence base. As is the case with all the other areas, no specific sites have been proposed as yet; this will take place as part of the Land Allocations.</p> <p>Policy TPT3 addresses the transport requirements for site allocations and development proposals; the topography of the area will be a consideration in the selection of sites (both the site itself and the surrounding access).</p> <p>The Land Allocations will address the specific location of sites; the proposed numbers for all the areas are, as mentioned, subject to review prior to the next stage</p>
							<p>the Council agree that this is not a satisfactory solution to the issue raised, it is a long-standing issue of concern and frustration to the Conservation Team and is not felt solveable through policies set out in the Core Strategy.</p>

ID	Name	Org. Details	Section Number	Nature of Response	Your comment	Response	Officers' Recommendation
					<ul style="list-style-type: none"> <li>● Car travel is required to achieve convenient access from the village.</li> <li>● Bus transport is available. However the prevailing climate is not conducive with waiting at bus stops.</li> </ul> <p><b>Development</b></p> <p>Expanded housing will require development of services outside the village centre that will not enhance the lives of those already living in the area.</p> <p>Development of Green belt will be required which will require its own services and create an insular settlement. The value of such would seem to be dubious when other main centres of community exist, already with their own services.</p> <p>The question has to be asked. What will happen to the village without added housing? Integration of the village centre is key to a sustainable future. Investment firstly in the village and its resources is important in providing a working centre for any development. Without this first stage of investment in its centre any separate development will be isolated, separate from the general life of the village. This centre development must firstly be to the benefit of the people already living here and not to simply satisfy the requirement for housing numbers.</p> <p>A new separate housing development will likewise not gain from a dead village. It would be a place of decay and vandalism. In the end those who will use the village suffer most. Commuter housing will not nourish the community only enhance its death.</p>		<p>of the Core Strategy. Policy TPH1 'Allocating Land for Housing' sets out the sequential approach to allocating land for housing; any new sites identified will, amongst other things, aim to reinforce communities rather than create separate, isolated development. Further work on this element will take place through the Land Allocations.</p>

# 102 Reasons for Policies

ID	Name	Org. Details	Section Number	Nature of Response	Your comment	Response	Officers' Recommendation
CSR8	Watson		22.50	Support	Total agreement, you have listened to the ward forum, any housing should be for the elderly as it will not cause school and traffic congestion.	No further action	The support is noted.
CSR9	Watson		22.51	Support	The railway line (disused) from Sowerby Bridge to Ripponden is begging to become a cycle path. Greenfield development should be limited to converting ugly agricultural buildings and limited to existing domestic curtilages.	No further action	The support is noted.



Table 5 Comments and responses to Sustainability Appraisal.

ID	Name	Org. Details	Section Number	Nature of Response	Your comment	Response	Officers' Recommendation
SA1	Smith	English Heritage	General	General Comment	<p>Where an uncertain or negative effect has been identified, is not clear precisely what measures the Sustainability Appraisal is proposing to reduce the level of harm or to achieve a positive outcome?</p> <p>The Sustainability Appraisal should set out, clearly, the measures by which it is considered the policy framework might be amended to reduce the numbers of Uncertain or Harmful effects.</p>	Further action Sustainability Appraisal	The next stage of the Core Strategy will continue to be informed by the Sustainability Appraisal; therefore any potential negative impacts will be considered in the drafting of the proposed policies, and further assessments and necessary amendments will be reported on in the final Sustainability Appraisal Report. It is acknowledged that more work needs to be carried out on the monitoring framework.
SA2	Smith	English Heritage	General	General Comment	In assessing the potential impacts of the policies of the plan against the Sustainability Appraisal Objectives, account should be taken of the measures already included within the policies themselves (or indeed elsewhere within the Plan) to reduce the potential adverse effects. Thus, in case of Policy TPH1 and its effects upon the historic environment, although the precise impacts of allocating land for housing are, indeed, uncertain, the policy itself contains a specific requirement that such allocations should respect the environmental and historic character of the District.	No further action	Comments are noted concerning the measures already within policies reducing adverse effects.
SA7	Davis		General	General Comment	The Sustainability Appraisal principle ought to apply with specific criteria being applied when assessing site specific allocations.	Further action in other document	The Land Allocations document will be subject to a Sustainability Appraisal.
SA16	King	Natural England	General	Support	We welcome the clear and generally comprehensive SA report, which meets the majority of the requirements of the SEA Directive and the "Reasons for Policies" document provides helpful information about how the	No further action	Support noted

ID	Name	Org. Details	Section Number	Nature of Response	Your comment	Response	Officers' Recommendation
SA21	King	Natural England	General	General Comment	<p>SA findings have shaped the selection of the Preferred Options.</p> <p>It would be helpful for the SA report to include a clear and concise conclusion section at the end, listing out the likely significant (both positive and negative) effects identified. This could then be used as the starting point for developing a monitoring framework during the next iteration of the SA.</p>	Further action Sustainability Appraisal	The SA report that will accompany the next stage of the Core Strategy will include a clear and concise conclusion chapter.
SA18	King	Natural England	1	Support with conditions	<p>We welcome the inclusion of a Non-Technical Summary of the SA Report; however as required by Annex 1 of the SEA Directive, all elements of the Environmental Report (or SA Report in this case) should be summarised, and a number are missing from the fairly brief summary provided within this SA Report. The Non-Technical Summary focuses on providing an introduction to the SA process and does not summarise any of the findings of the SA or the measures envisaged concerning mitigation and monitoring of effects, and it does not meet other requirements such as describing the likely evolution of the local environment without implementation of the plan. The Non-Technical Summary should therefore be expanded to ensure that all of the required elements are included (i.e. requirements A to I) listed in Table 4.1).</p>	Further action Sustainability Appraisal	A full, non technical summary will be provided in the final SA Report that will accompany the next stage of the Core Strategy.
SA17	King	Natural England	Table 4.1	Support with conditions	<p>Table 4.1 helpfully signposts where the various requirements of the Directive have been met; however we are concerned that the requirement to consider the likely evolution of the current state of the environment without implementation of the plan has not been met. Table 4.1 states that this requirement has been met within Appendix 2 of the SA Report; however that appendix sets out the baseline data but does not include an assessment of how the local environment is likely</p>	Further action Sustainability Appraisal	Further work will be carried out in relation to part B of the SEA prior to the next stage of the Core Strategy.

ID	Name	Org. Details	Section Number	Nature of Response	Your comment	Response	Officers' Recommendation
SA19	King	Natural England	6	Support	<p>evolve without implementation of the Core Strategy. One way of meeting this requirement would be to produce an additional table projecting the likely evolution of each of the key sustainability issues identified against the planning framework that would exist if the Core Strategy were not in place (i.e. the NPPF and Replacement Calderdale UDP (as amended 2009)).</p> <p>Appendix 1 contains a detailed and comprehensive review of relevant plans, policies and programmes, and we welcome the clear links made between each plan, policy or programme and the implications for the Plan and the SA.</p>	No further action	Support noted
SA20	King	Natural England	Table 10.1	General Comment	<p>We would like to reiterate the earlier comment that we made in relation to the SA Scoping Report (2008/09) that SA objective 12: to protect and enhance the natural, semi-natural and manmade landscape should include an additional qualitative indicator to monitor changes in the character of the natural, semi-natural and man-made landscape within the District. This indicator would need to be underpinned by a robust and detailed District-wide Landscape Character assessment study. The adopted approach should reflect the monitoring framework provided by the National Countryside Quality Counts initiative for monitoring landscape change.</p>	Further action Sustainability Appraisal	<p>Further work on the Decision Making Criteria and associated indicators and targets relevant to SA objective 12 will be carried out prior to the next stage of the Core Strategy, along with issues surrounding landscape character.</p>
SA14	Witcher	Shibden Valley Society	11	Object	<p>In our original comments on the 2008 Scoping Report, we drew attention to the serious omission of criteria in relation to Landscape <i>per se</i> and urged the inclusion of specific policies to protect areas of landscape quality, as in the R.U.D.P. We are therefore surprised and</p>	Further action Sustainability Appraisal	<p>Your comments on the apparent emphasis on biodiversity over Landscape are noted. Further work on both SA 10 and 12 will take place prior to the next stage of the Core Strategy.</p>

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					<p>disappointed that our earlier comments have been ignored and that in this Appraisal Report, Objective SA12 'To protect and enhance the natural, semi natural and manmade landscape' has been combined with, and lost within, the analysis of SA10 Biodiversity. The word 'biodiversity' occurs 52 times in paragraphs 11.53 to 11.65; the word 'landscape' not at all. Paragraphs 12.77 to 12.87 mention 'biodiversity' 27 times and 'landscape' only twice. It is hard to escape the conclusion that the effect of development on the landscape has been almost forgotten as an issue.</p> <p>Some of us remember the days when protecting and enhancing the landscape [and townscape] of Calderdale was an absolute priority for Planning. Many residents of the Shibden Valley are outraged that the Council disregarded the Society's advice to amend the plans for the new shed for the Leo Group and ignored its disastrous effect on the landscape. In the light of the proliferation of wind turbine proposals in the Valley and proposals to enlarge the Ovenden Moor wind farm, it is also a surprise that this Appraisal makes reference to the effects of wind turbines only in terms of their impacts on bats and birds, and not on the landscape!</p> <p>Surely also consideration of the effects of light pollution should extend not only to nocturnal wildlife but also to its effects on human beings. Specific policies should be devised to control lighting levels to reduce energy consumption.</p>		<p>The SA is unable to influence current policy, and therefore decisions on planning applications; however it will form a part of the ongoing monitoring framework for the new Local Plan. In relation to the impacts of wind turbines on the landscape, the Core Strategy policy and subsequent Land Allocations policies will be informed by two reports focusing on the capacity and sensitivity of the landscape to further wind farm developments, as well as a study on the impact of small scale wind turbines on the Landscape.</p> <p>In terms of the effects of light pollution, further work on the Sustainability Appraisal framework will be carried out to ensure this issue is considered.</p>
SA12	Witcher	Shibden Valley Society	11.46	General Comment	<p>SA9, the Impact of Traffic on the environment, is a matter of serious concern to the Society because of the effects of 'rat-running' along the narrow lanes through the valley. The report rightly recognises [11.46] that 'development in the Northowram and Shelf area would be likely to increase traffic volumes in the Halifax/Bradford corridor, as there is no rail provision in</p>	Further action Sustainability Appraisal	<p>The SA will continue to inform the development of the Core Strategy, including the Northowram and Shelf area policy. The SA recognises that development could result in benefits (through the Community</p>

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SA15	Witcher	Shibden Valley Society	12	Object	<p>In our original comments on the 2008 Scoping Report, we drew attention to the serious omission of criteria in relation to Landscape <i>per se</i> and urged the inclusion of specific policies to protect areas of landscape quality, as in the R.U.D.P. We are therefore surprised and disappointed that our earlier comments have been ignored and that in this Appraisal Report, Objective SA12 'To protect and enhance the natural, semi natural and manmade landscape' has been combined with, and lost within, the analysis of SA10 Biodiversity. The word 'biodiversity' occurs 52 times in paragraphs 11.53 to 11.65; the word 'landscape' not at all. Paragraphs 12.77 to 12.87 mention 'biodiversity' 27 times and 'landscape' only twice. It is hard to escape the conclusion that the effect of development on the landscape has been almost forgotten as an issue.</p> <p>Some of us remember the days when protecting and enhancing the landscape [and townscape] of Calderdale was an absolute priority for Planning. Many residents of the Shibden Valley are outraged that the Council disregarded the Society's advice to amend the plans for the new shed for the Leo Group and ignored its disastrous effect on the landscape. In the light of the proliferation of wind turbine proposals in the Valley and proposals to enlarge the Ovenden Moor wind farm, it is also a surprise that this Appraisal makes reference to</p>	<p>Further action Sustainability Appraisal</p>	<p>Your comments on the apparent emphasis on biodiversity over Landscape are noted. Further work on both SA 10 and 12 will take place prior to the next stage of the Core Strategy.</p> <p>The SA is unable to influence current policy, and therefore decisions on planning applications; however it will form a part of the ongoing monitoring framework for the new Local Plan. In relation to the impacts of wind turbines on the landscape, the Core Strategy policy and subsequent Land Allocations policies will be informed by two reports focusing on the capacity and sensitivity of the landscape to further wind farm developments, as well as a study on the impact of small scale wind turbines on the Landscape. In terms of the effects of light pollution, further work on the Sustainability Appraisal</p>
					<p>this area to accommodate commuter journeys'. Policy NS1 is also seen [12.75] as having negative impacts, as more people drive and emissions increase. Positive impacts are unlikely as there is no scope to reduce congestion at Stump Cross lights. We fear the consequence of more unsustainable and polluting commuting traffic through the Valley, to the detriment of biodiversity.</p>		<p>Infrastructure Levy or Planning Obligations), but also negatives (increased traffic). There is also a comment on how reduced congestion could be short lived as more people would then see driving as more attractive, which would not have a positive long term impact on the SA objective.</p>

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SA8	Witcher	Shibden Valley Society	12.29	Support	<p>As regards recreation [SA3], we welcome the recognition [at 12.29] that enhancing footpaths etc. should help improve access to the countryside and suggest that the provision of green infrastructure [12.30] applies to rural as much as to urban areas. The condition of rights of way in the Valley is a matter of concern, and the Society is working with the Council to improve these. The Calderdale Way and its linking footpaths are of particular policy relevance.</p>	No further action	Support noted.
SA9	Witcher	Shibden Valley Society	12.30	Support	<p>As regards recreation [SA3], we welcome the recognition [at 12.29] that enhancing footpaths etc. should help improve access to the countryside and suggest that the provision of green infrastructure [12.30] applies to rural as much as to urban areas. The condition of rights of way in the Valley is a matter of concern, and the Society is working with the Council to improve these. The Calderdale Way and its linking footpaths are of particular policy relevance.</p>	No further action	Support noted.
SA4	Smith	English Heritage	12.52	General Comment	<p>It is not clear why Norththram has been singled out as a settlement where development coming forward under the strategy that is set out in CP1 might impact upon Objective SA7. In theory, virtually every settlement with heritage assets could, potentially, be impacted upon by this policy.</p>	Further action Sustainability Appraisal	Comments are noted concerning the need to ensure the potential impacts on all areas heritage assets are considered.
					<p>the effects of wind turbines only in terms of their impacts on bats and birds, and not on the landscape! Surely also consideration of the effects of light pollution should extend not only to nocturnal wildlife but also to its effects on human beings. Specific policies should be devised to control lighting levels to reduce energy consumption.</p>		framework will be carried out to ensure this issue is considered.

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SA10	Witcher	Shibden Valley Society	12.52	Support with conditions	For SA7, we strongly support the protection and enhancement of historic sites and buildings and the need to take into account local character and distinctiveness [12.52], not only near listed buildings and in conservation areas but also in Special Landscape Areas such as the Shibden Valley. We particularly underline the references [in 12.52 & 12.59] to the potentially negative effect of increased new housing to the western side of Northwram, in terms of the landscape and rural setting of the Northwram Conservation Area.	Further action Sustainability Appraisal	The Decision Making Criteria and related indicators will be reviewed to take into account the potential impact on the Special Landscape Areas.
SA5	Smith	English Heritage	12.54	General Comment	This paragraph notes that it is " <i>important that policy CP6 reflects the NPPF</i> ", as we have pointed out in our representations to the policy, delivering sustainable development insofar as it related to the historic environment entails more than simply ensuring that development " <i>reflects the local and historic character of the area</i> ". Consequently, it is hoped that Policy CP6 is amended to reflect the conclusions of this Sustainability Appraisal.	Further action in other document	The wording of Policy CP6 will be reviewed prior to the next stage of the Core Strategy to take into account your comments.
SA6	Smith	English Heritage	12.59	General Comment	We would concur with the potential impact of these Area Based policies upon the historic environment. However, the conclusions within the Sustainability Appraisal that the Plan needs to consider the specific heritage assets identified (such as Kirklees Priory, Elland Conservation Area etc.) should be addressed within the respective policies.	Further action in other document	The wording of the specific area policies mentioned will be reviewed prior to the next stage of the Core Strategy.
SA11	Witcher	Shibden Valley Society	12.59	Support with conditions	For SA7, we strongly support the protection and enhancement of historic sites and buildings and the need to take into account local character and distinctiveness [12.52], not only near listed buildings and in conservation areas but also in Special Landscape Areas such as the Shibden Valley. We particularly underline the references	Further action Sustainability Appraisal	The Decision Making Criteria and related indicators will be reviewed to take into account the potential impact on the Special Landscape Areas.

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SA3	Smith	English Heritage	Table 12.7	General Comment	<p>[in 12.52 &amp; 12.59] to the potentially negative effect of increased new housing to the western side of Northowram, in terms of the landscape and rural setting of the Northowram Conservation Area.</p> <p>It is not clear why Northowram has been singled out as a settlement where development coming forward under the strategy that is set out in CP1 might impact upon Objective SA7. In theory, virtually every settlement with heritage assets could, potentially, be impacted upon by this policy.</p>	Further action Sustainability Appraisal	Comments are noted concerning the need to ensure the potential impacts on all heritage assets are considered.
SA13	Witcher	Shibden Valley Society	12.75	General Comment	<p>SA9, the Impact of Traffic on the environment, is a matter of serious concern to the Society because of the effects of 'rat-running' along the narrow lanes through the valley. The report rightly recognises [1.46] that 'development in the Northowram and Shelf area would be likely to increase traffic volumes in the Halifax/Bradford corridor, as there is no rail provision in this area to accommodate commuter journeys'. PolicyNS1 is also seen [12.75] as having negative impacts, as more people drive and emissions increase. Positive impacts are unlikely as there is no scope to reduce congestion at Stump Cross lights. We fear the consequence of more unsustainable and polluting commuting traffic through the Valley, to the detriment of biodiversity.</p>	Further action Sustainability Appraisal	The SA will continue to inform the development of the Core Strategy, including the Northowram and Shelf area policy. The SA recognises that development could result in benefits (through the Community Infrastructure Levy or Planning Obligations), but also negatives (increased traffic). There is also a comment on how reduced congestion could be short lived as more people would then see driving as more attractive, which would not have a positive long term impact on the SA objective.