

Supplementary Planning Document:

Consultation statement

Introduction

This is the 'Consultation Statement' for the Thornhills Garden Community Masterplan SPD as required by the Town and Country Planning (Local Planning) (England) Regulations 2012. This statement sets out how the public and other stakeholders were consulted upon the SPD.

Consultation regulations

The SPD is produced in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. The relevant regulations relating to the consultation process are explained below.

Regulation 12: Regulation 12(a) requires the Council to produce a consultation statement before adoption of the SPD, this must set out who was consulted, a summary of the issues raised, and how these issues were incorporated into the SPD. This statement is the 'Consultation Statement' for the adopted SPD as required by Regulation 12(a).

Regulation 12(b) requires the Council to publish the documents (including a 'consultation statement') for a minimum 4 week consultation, specify the date when responses should be received, and identify the address to which responses should be sent. The consultation statement that accompanied the draft SPD set out that information.

Regulation 13: Regulation 13 stipulates that any person may make representations about the SPD and that the representations must be made by the end of the consultation date referred to in Regulation 12. The consultation statement that accompanied the draft SPD set out that requirement.

Regulation 35: Regulation 12 states that when seeking representations on an SPD, documents must be made available in accordance with Regulation 35. This requires the Council to make documents available by taking the following steps:

- Make the document available at the principal office and other places within the area that the Council considers appropriate;
- Publish the document on the Council's website.

These measures were undertaken as part of the draft SPD consultation.

In addition, numerous methods were utilised to inform the public of the draft SPD consultation:

- Press Release - articles in Halifax Courier and Huddersfield Examiner.
- Social Media - regular updates on Council Twitter feed and Facebook pages.
- Approximately 4000 notification emails sent to all individuals/ organisations/ bodies registered on the consultee database, (including ward Councillors, Parish Councils, statutory consultees, members of the public, developers, business, local voluntary organisations).

- Email notification to all ward councillors and landowners prior to commencement of consultation period.
- Calderdale Council website updates and notifications.
- Hard copies of the documents posted in all libraries across the borough (as above)
- Providing telephone number and email address of the Spatial Planning Team should anyone require further detail, assistance in viewing the document or assistance in working the Council's online consultation portal.
- Hard copies of documents delivered to residents who have difficulty accessing online versions, or those posted at libraries.

Statement of Community Involvement (SCI)

The SCI was adopted in 2016 and reflects the 2012 Regulations, set out above. It also specifies additional measures that the Council will undertake in consulting upon draft SPDs, and these have been reflected in the consultation process for the Garden Communities SPD.

Garden Communities SPD Consultation Information

Consultation on the SPD has been carried out in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. The draft SPD and Consultation Statement were made available for inspection by the public for a four-week period between Friday 25 August 2023 and Monday 25 September 2023. Copies of the draft SPD and consultation statement (setting out how comments could be made) were available at the following locations:

- Calderdale Council Custom First offices at Horton Street, Halifax
- Public libraries at Halifax Central, Akroydon, Beechwood Road, Brighouse, Elland, Hebden Bridge, King Cross, Mixenden, Northowram, Rastrick, Sowerby Bridge and Todmorden

Copies of the draft SPD were available to view via the Council's website at <https://calderdale.gov.uk/spds>. Further information was available by contacting the Spatial Planning team by email at spatial.planning@calderdale.gov.uk or by telephoning 01422 288001.

Summary of Issues Raised and How Incorporated into the SPD

There was a total of 33 contributors who commented on the draft SPD were received from external parties, including statutory agencies, housebuilders and members of the public.

A full schedule of representations received, and the Council's response is set out in Table 1. This also details the amendments to the draft SPD. The SPD has been updated to reflect that it is no longer draft and that the consultation has been undertaken.

The Council has responded to substantive issues and has not provided a response to issues that fall outside the scope of this SPD. The Council would encourage those reading this document to read other responses to issues as they may provide additional context and detail.

Table 1: Schedule of Representations Received and Council response.

Thornhills Garden Community Masterplan SPD (Bookmark THMP)

Consultee	Comment	Council response and SPD amendment (where applicable)
<p>1339968</p> <p>Mel Ogden</p>	<p>THMP1 & WOMP1</p> <p>As a long-standing Brighouse resident I've seen the town expand and develop and appreciate that as populations increase and the M62 corridor proves increasingly popular for commuters and property builders alike, that there is a growing appetite to build more homes in the Brighouse area.</p> <p>But I find the proposed Thornhills and Woodhouse so-called 'garden communities' insulting, particularly as these are being positioned as 'A place to live and work alongside nature, one that integrates the natural landscape within every neighbourhood. A place that is in harmony with its surroundings'.</p> <p>I really appreciate the current abundance of green spaces and wildlife that I have access to as a Brighouse resident. Building over 1,000 houses on part of that green space and more than doubling the size of the Woodhouse estate which I grew up in, is not working alongside nature, and not being sensitive to the area.</p> <p>Add to that the number of homes proposed in the Thornhills garden community plan and our already gridlocked town, will be smothered by traffic and will lose much of its surrounding breathing space - negatively impacting existing and future residents.</p> <p>Brighouse is an attractive place to live because it is not currently overdeveloped, because it has managed to retain much of its greenspaces. Within five minutes of walking from wherever you</p>	<p>The principle of development on this site was the subject of in-depth discussion throughout the Local Plan examination process. As a result, the land was removed from the Green Belt and allocated as a Garden Suburb on adoption of the Local Plan (22nd March 2023).</p> <p>The purpose of this consultation was not to seek comments on the principle of the allocation, but for comments to be made on the Supplementary Planning Document (SPD), which establishes the broad principles to show how the Garden Community should be designed, translating the policy requirements of the Local Plan into a well-designed and successful place.</p> <p>Planning applications will need to be in conformity with the policies in the adopted Local Plan - the detailed Site Specific Considerations for this allocation listed in Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road, Brighouse and Appendix 1 – Site Number LP1451 – Land between Bradley Wood and Woodhouse Lane, Rastrick, and the wider policy framework which covers matters such as air quality, design, biodiversity, open space and design of highways and accesses.</p> <p>The SPD builds on the policies in the Local Plan and provides a detailed breakdown of the specific measures required to mitigate the impacts of development, their funding strategies, and their likely delivery timeframes.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>live in Brighouse, you can be close or in a greenspace, whether that's fields or woodland .</p> <p>Were this proposal to be for a wind or solar panel farm, which would mean retention of our greenspaces while creating much needed renewal energy, without a massive influx of people, cars and demand on the town's resources, then I would be in favour.</p> <p>Modern, glossy brochure developments look very appealing and attractive and I'm sure attract a lot of revenue from developers and new homeowners. Allowing smaller pockets of new homes to redevelop brownfield sites makes much more sense in my opinion but as it's not as 'attractive' or lucrative, I'm unsurprised we're not seeing a plan for that.</p> <p>I don't believe the proposals are in the best interests of Brighouse, its residents, its wildlife or its future.</p>	
<p>1340096</p> <p>National Highways (Simon Jones)</p>	<p>THMP2</p> <p>Many thanks for the consultation regarding the latest SPD for the two Garden Villages of Thornhills and Woodhouse, being promoted through the Local Plan.</p> <p>Having reviewed the consultation documents published, National Highways on behalf of the Secretary of State for Transport has no specific comments in regards to the illustrated internal layouts/parking/access and public transport considerations being specified. The SPD has understandably not been designed to consult with senior stakeholders, however this consultation does give us the opportunity to again reiterate the position given at the Local Plan enquiry stage, whereby the promoter/Council are advised that prior to the formal submission of any future planning application to engage with the West Yorkshire planning team (I have copied herein the case officer –</p>	<p>Noted.</p> <p>Phase 1 developers have engaged with National Highways during development of schemes.</p>

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	<p>Paula Bedford), they should ascertain the potential impact the sites may have on the Strategic Road Network.</p> <p>Pre-application engagement to bring together the necessary traffic and transport evidence as part of the Transport Assessment and Travel Planning processes, ahead of formal applications, will ensure that we can reach an agreed position ahead of formal comments from ourselves at the Application stage, and saves unnecessary delays to any future grants of consent.</p> <p>As the Council will recall from the evidence I gave at the EiP for the LP, we entered a statement of common ground agreeing to address both the individual and cumulative impacts of these developments (as part of an aggregated LP aspiration) as they came forward at planning application stage. To date I am not aware from the team that the Council has been in touch to discuss these, and we would welcome engagement when all are ready to open those discussions. Paula will be happy to lead this.</p> <p>Ahead of this pre-planning work taking place, the SPD consultation is a good opportunity to also ensure that NH is able to also share the newly adopted DfT policy under which the Garden Villages will be reviewed, and our recommendations made thereafter – a link to ‘The strategic road network and the delivery of sustainable development’ is enclosed below:</p> <p>https://www.gov.uk/government/publications/strategic-road-network-and-the-delivery-of-sustainable-development/strategic-road-network-and-the-delivery-of-sustainable-development</p> <p>In the interim, our continued best wishes with the consultation exercise and we look forward to working together in the future to</p>	

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	help realise the delivery of the site allocations with yourselves, and the site promoters.	
1340112 Sharon Boothroyd	<p>THMP3</p> <p>We're writing in response to the information I read today in the Halifax Evening Courier.</p> <p>The feature invited local people to give feedback on Calderdale council's house building local plan.</p> <p>We were puzzled by some of aspects regarding this 'garden community.'</p> <p>Some of the 'new' plans include:</p> <p>A park - we already have one. The Clifton Village Association raised funds for play equipment. Plus, Wellhome park is fairly nearby.</p> <p>A nursery and a primary school – we already have both</p> <p>A cafe - we already have a thriving one at The Methodist Church, which is used a lot, all year round.</p> <p>A community hall/centre – we have 2 in Clifton.</p> <p>The Methodist church has one. It runs yoga, knitting, craft and art groups.</p> <p>There is also another community centre, on the estate where we live, which is owned by Together Housing.</p> <p>It's mainly used for bingo but it would be good if other activities were set up here, too.</p> <p>A community growing area - there already is an allotment in Clifton.</p>	<p>The principle of development on this site was the subject of in-depth discussion throughout the Local Plan examination process. As a result, the land was removed from the Green Belt and allocated as a Garden Suburb on adoption of the Local Plan (22nd March 2023).</p> <p>The purpose of this consultation was not to seek comments on the principle of the allocation, but for comments to be made on the Supplementary Planning Document (SPD), which establishes the broad principles to show how the Garden Community should be designed, translating the policy requirements of the Local Plan into a well-designed and successful place.</p> <p>Planning applications will need to be in conformity with the policies in the adopted Local Plan - the detailed Site Specific Considerations for this allocation listed in Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road, Brighouse, and the wider policy framework which covers matters such as air quality, design, biodiversity, open space and design of highways and accesses.</p> <p>The SPD builds on the policies in the Local Plan and provides a detailed breakdown of the specific measures required to mitigate the impacts of development, their funding strategies, and their likely delivery timeframes.</p>

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	<p>Walking and cycling routes – the lovely route around Thornhills Lane and Jay House lane is already a walking and cycling route. It's used by lots of people, including us.</p> <p>My husband is registered disabled and uses a mobility scooter.</p> <p>If you wanted to create a new route for people who use bikes, buggies, mobility scooters and wheelchairs, you could think about making the nice pathway around the golf course at Clifton flat, even and smooth.</p> <p>This path is not disabled friendly. The CVA can only raise a limited amount of money.</p> <p>The canal towpath at Brighthouse and the Cromwell bottom nature reserve are also out of bounds for disabled people, so he is very limited when he wants to enjoy wildlife, peace and natural beauty. This should be freely available for everyone.</p> <p>If you disagree, we'd like to know why.</p> <p>I only walk with my husband, as I can't walk long distances on my own, due to severe anxiety. (Basically, I'm frightened of being attacked). So I'm unable to take the golf course route or walk on the canal towpath alone.</p> <p>The other reason why we strongly object to the house building is because the 'local plan' will destroy precious green belt land.</p> <p>I realise that to Calderdale council and property developers, it isn't regarded as precious. I expect you both see it as prime spare land that will make a tidy profit and meet central government targets.</p> <p>But it's our little piece of heaven.</p>	

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	<p>I suffer from mental health issues - anxiety and depression, plus undiagnosed autism.</p> <p>Ambling round this area (with my husband in his scooter) on a regular basis is my main form of psychological therapy.</p> <p>Most health care professionals urge us to get out into the countryside and enjoy green open space – there's bird song, trees, wildlife, peace and quiet, fresh air, scenic views and all the animals grazing here. It's a pure, simple, joy.</p> <p>I don't expect it means much to you, or the property developers, but it raises our spirits and make us feel happy and good to be alive.</p> <p>This is now called a 'social prescription'. In other words, it assists patients like me to come off anti- depressants or sedatives, and it helps them to find meaning and quality in their life.</p> <p>Everyone walking by says hello, so it alienates loneliness.</p> <p>Keith can easily get round this route on his scooter. It's on our doorstep and we absolutely love it.</p> <p>It means such a lot to us.</p> <p>If you adopt the 'local plan' (which wasn't voted in by any non-official Calderdale resident) that therapy will be cruelly snatched away.</p> <p>You talk about being a council with a green awareness. You claim you want to protect the environment and wildlife.</p> <p>You seem proud of Calderdale's natural beauty - yet you want to demolish it.</p>	

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	<p>'Well, if you want countryside, go to the Yorkshire dales' is perhaps the council's and a property developer's response.</p> <p>But we don't have a car and it's not easy travelling to (and accessing) The Yorkshire Dales when you're disabled.</p> <p>We can't even access the canal in Brighouse and Cromwell bottom. Why not put your budget into making that disabled friendly instead?</p> <p>We don't own our home, so in our case, our objections here are not about a possible decrease in property prices.</p> <p>It's about severely lowering the spiritual and emotional quality of our lives.</p> <p>We realise that this is not important to the council or a property developer, but this is the case for us.</p> <p>The community in Clifton respect and love this area, and as you know, will do their absolute best to save it.</p> <p>So why not listen to their concerns, instead of trying to meet central government targets? We know you don't own the land, so why is Calderdale council, enabling a property developer to make a profit from your plans? If you were turning the land into a protected nature reserve, then fair enough - but you're not.</p> <p>Listening to local people - and acting on it- is what a council should do.</p> <p>We're asking you to save our Clifton greenbelt. It's precious to residents and it ought to be precious to you. It's part of our history and our heritage.</p> <p>Please, please think again. Please don't destroy it.</p>	

Consultee	Comment	Council response and SPD amendment (where applicable)
1340194 John Smith	THMP4 Whole Document Dear Councillor Scullion. Having read the Halifax Courier article re: the above developments, I would appreciate your comments on the following points which appear lacking in the plans. 1. No provision appears to have been made for access for anyone unable to walk or cycle. 2. No provision for adequate NHS Dental facilities appear to have been considered, not everyone can afford private treatment. 3. No mention of adequate NHS medical facilities appears.	Refer to paragraph 4.5 of the Draft Thornhills Garden Community Masterplan SPD . The Masterplan seeks to prioritise active travel but plans for a network of streets provides legible and permeable connections to footways and cycleways – See paragraph 6.2.17 of the Draft Thornhills Garden Community Masterplan SPD . Discussion with the NHS Estates Delivery Unit confirmed that there would be no appetite for the provision of on-site health and wellbeing hubs that could accommodate surgeries, pharmacies and other associated facilities. Increased demand will instead be accommodated through the enlargement of existing facilities in the local area.
1338499 Richard Todd	THMP6 Pg 19 3.2.2 bullet point 9 Reference to traffic calming Jay House Lane early phase development appear to be served by Jay House Lane not by primary access Pg 22 4.1 Ref residential parcel 6 access appears to be from Jay House Lane Pg 46 6.2.1 Will utility strategies take into account existing properties within red line boundary of Thornhill garden community?	The latest detailed site layout does not indicate access from Jay House Lane, in accordance with highway advice. In terms of utility provision, throughout the Local Plan process, the Council regularly met with representatives of all the relevant statutory organisations / providers and shared details of the scale, timing and distribution of growth proposed within Calderdale. These included Northern Gas Networks, Yorkshire Water and Northern Power Grid. Parties found regular sharing of information to be helpful including as part of their own asset management, systems and investment planning programmes.

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		<p>Utility providers are also consulted as part of the borough-wide Infrastructure Delivery Plan preparation, the Garden Communities masterplanning process (including attending relevant workshops on specific matters) and on the draft SPDs.</p> <p>The utility strategy will take existing properties into account.</p>
<p>1125251</p> <p>Dr Andrew McElligott</p>	<p>THMP7</p> <p>There appears to be a major problem with the timing of this public consultation in that it is taking place before the A641 full business case is published (due before WYCA sometime this autumn). There are other timing problems (e.g. summer holidays, ongoing legal challenge to Local Plan) but asking for comments on these SPDs prior to the public seeing the final A641 plans is a significant error as outlined below.</p> <p>The main bone of contention here relates, inevitably, to transport infrastructure. In the Supplementary Planning Documents great play is made of the importance of the A641 Corridor Improvement Programme and the council's IDP is referenced in that respect but when we compare the 2020 IDP (ref CC66) and the 2021 update (ref CC123) with the latest A641 consultation documents from earlier this year we can see that a number of elements from that scheme which were previously described as "essential" (council's own words) have now been dropped.</p> <p>The most glaring example is the A641-A643 link road passing through Thornhills (ref BG10).</p> <p>Others include the new two-way link road between Bradford Rd and Birkby Lane (ref BB06), widening the bottom end of Clifton Common (ref BG07) and a replacement bridge over the River Calder at Huntingdon Rd (ref BG15).</p>	<p>The A641 Corridor Improvement Programme has not reached Full Business Case yet.</p> <p>The Inspector commented at some length in her Final Report on the A641 and acknowledged that many of the transport schemes are in the process of developing business cases.</p> <p>Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road, Brighouse of the Local Plan is accordingly flexible in this regard:</p> <p><i>Unless demonstrated otherwise through an up-to-date Transport Assessment, no more than 680 units shall be delivered in advance of the completion of the critical schemes listed in the IDP (2021). The IDP is a provisional list and is subject to change as masterplanning work progresses and the A641 business case is developed.</i></p>

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	<p>Given all the above it is difficult, if not impossible, to see how Brighthouse and the A643 don't become totally overwhelmed with traffic.</p> <p>We really need to know if and when the above mentioned schemes were deemed to no longer be essential and by whom.</p> <p>I think it will be impossible for the public to comment properly on the Supplementary Planning Documents without seeing the A641 full business case. We simply don't have all the information we need.</p> <p>(CC references above are taken from the Local Plan Examination Library. BB and BG references above are taken from the A641 consultation documents).</p>	
<p>1260236</p> <p>The British Horse Society (Mark Corrigan)</p>	<p>THMP10 & WOMP25</p> <p>Thornhills & Woodhouse Garden Community Consultation</p> <p>I am writing on behalf of the British Horse Society (BHS) in response to the current consultation on the Thornhills & Woodhouse Garden community. The BHS is the largest and most influential equestrian charity in the country, working to improve the lives of horses and their owners through its four core foundations of education, welfare, safety and access.</p> <p>BACKGROUND TO OUR COMMENTS</p> <p>Nationally, it is estimated that there are 3.5 million people in the UK who ride or who drive a horse-drawn carriage. We estimate that there are currently more than 87,000 horses within the county contributing at least £313 million each year to the local economy, mainly through goods and services supplied by small businesses such as feed merchants, vets, farriers, trainers, saddlers, etc.</p>	

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	<p>A significant number of these horses kept, both at small yards and at large equestrian centres.</p> <p>Road Safety is a particular concern to equestrians, who are among the most vulnerable road users. Between November 2010 and February 2021, the BHS received reports of 5,784 road incidents, in which 441 horses and 44 people were killed with 1350 people and 1,198 horses injured, 75% of these incidents occurred because a vehicle passed by too closely to the horse. Research indicates however that only 1 in 10 incidents are being reported to the BHS; in 2021-22 alone, 3,261 horse riders and carriage drivers in England and Wales were admitted to hospital after being injured in transport accidents. (NHS Hospital Episodes Statistics).</p> <p>The BHS actively campaigns to improve road safety by making motorists aware of what to do when they encounter horses on the road (see https://www.bhs.org.uk/our-work/safety/dead-slow – we recommend taking a few minutes to watch the 'Dead Slow' virtual reality film for an impression of how vulnerable equestrians are in proximity to cars and lorries).</p> <p>Because of the difficulties that equestrians encounter on roads, they avoid using them wherever possible. Road use is often unavoidable, however, sometimes simply because people have nowhere else to exercise their horses. The main off-road access available to them is the network of Rights of Way (RoW), however in many places the RoW network is fragmented, often as a result of the most heavily used routes being adopted as vehicular highways, and roads are often the only available links between one RoW and the next. Connecting off road routes should therefore be given a high priority in the interests of ALL vulnerable road users.</p>	

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>England and Wales Have over 140,000 miles of PRow, but only 22% of this network is available for horse riders (who may only use routes designated as bridleways, byways and restricted byways) An additional factor is that the network is fragmented, and roads are often the only available links between one PRow and the next.</p> <p>Calderdale has around 685 miles of PRow, but only approximately 125 miles or 18% of this network is available for horse riders well below the national average of 22%. We would like to see an increase in the network available to horse riders.</p> <p>a. Recognition of equestrians as vulnerable road users</p> <p>Historically, pedestrians and cyclists have been considered as the main vulnerable road users. Equestrians are however increasingly recognised as being part of this group: during the Parliamentary Debate on Road Safety in November 2018 Jesse Norman, Under Secretary of State for Transport, stated that</p> <p>“We should be clear that the cycling and walking strategy may have that name but is absolutely targeted at vulnerable road users, including horse-riders.”</p> <p>b. Inclusion of equestrians in the Active Travel Strategy</p> <p>The term ‘Active Travel’ applies to journeys undertaken for a range of purposes, whether to reach a place of work or local amenities, or for recreation. It is also the case that many of the routes that are used to walk or cycle to work or school are the same routes which at other times provide for recreational use.</p> <p>It is now acknowledged that horse-riding is as much an ‘active travel’ mode as recreational walking or cycling. At the recent Parliamentary Debate on Active Travel in Westminster Hall, Robert Courts MP proposed that “horse riders...ought to be</p>	

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>thought about in the context of active travel as well.” This was endorsed by Michael Ellis, Minister of State for Transport, who confirmed that “Active travel includes horse riders and bridle paths – this debate includes them.”</p> <p>Cambridgeshire and Peterborough Council has defined Active Travel as “Physically active modes such as walking, or horse riding. It also includes walking or cycling as part of a longer journey.” (See Cambridge and Peterborough Report)</p> <p>c. Equestrians to be included in any shared-use routes, wherever possible</p> <p>In order to maximise opportunities within development to help provide more off-road links for equestrians, where shared-use routes are created for active travel as a part of any development, planning policy should support the automatic inclusion of horse riders on shared off-road routes, unless there are specific reasons why this is not possible.</p> <p>Conflict with cyclists is sometimes given as a reason for excluding horses from shared routes, but this rarely has anything to do with either the horse or the bicycle, simply the inconsiderate person who happens to be riding one or the other. Horse riders and cyclists as two vulnerable road user groups have more in common with each other than differences. This is illustrated by the work that the BHS is doing in partnership with Cycling UK in the current "Be Nice, Say Hi!" campaign and with Sustrans in their 'Paths for Everyone' initiative.</p> <p>The key to a successful shared route is the design: for example, rather than positioning a cycle path down the centre of a route with verges either side, the cycle path should be positioned to one side and the two verges combined to provide a soft surface for walkers, runners and horses on the other. (This also</p>	

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	<p>addresses the issue of horse droppings which, as research has confirmed, represent no danger to health and disperse quickly, particularly on unsurfaced paths.)</p> <p>d. Reference to the Hampshire Countryside Access Forum (HCAF) guidance Equestrians in Hampshire</p> <p>The HCAF has developed this guidance for planners and developers in response to feedback from local authorities, which indicated that they would welcome more information about how they can include equestrians in their work, engagement and consultation.</p> <p>Written by members of HCAF with support from Hampshire Countryside Service and the BHS, this document has been widely circulated within and beyond Hampshire, sparking interest from other authorities outside the county.</p> <p>e. Benefits to the Economy</p> <p>"The most recent national survey by the British Equestrian Trade Association (BETA – which represents more than 800 member companies) concluded that nationally the equestrian sector (excluding the racing industry) was worth £4.7 billion a year to the UK economy. Based on an estimated horse population of 847,000, this represents just over £5,548 per horse." There are currently 298 registered equine passport holders in the Calderdale post code area, therefore a significant annual local contribution of £1,653,304. from horse riders https://www.beta-uk.org/pages/news-and-events/news/national-equestrian-survey-2019-providesoptimistic-view-of-industry.php</p> <p>f. THE HEALTH BENEFITS OF HORSE RIDING and ASSOCIATED ACTIVITIES:</p>	

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>(Data comes from research undertaken by the University of Brighton and Plumpton College on behalf of The British Horse Society)</p> <p>68% of questionnaire respondents participate in horse riding and associated activities for 30 minutes or more at least three times a week. Sport England estimate that such a level of sporting activity will help an individual achieve or exceed the government's recommended minimum level of physical activity.</p> <p>Women have been identified in government studies as a social group with relatively low levels of participation in physical activity. Some 93% of questionnaire respondents were women and 49% percent of female respondents were aged 45 or above. These are comparable figures to a major Sport England survey which found that 90 percent of those participating in equestrianism are women and 37 percent of the female participants in equestrianism are aged 45 or above. The gender and age profile of equestrianism is not matched by any other sport in the UK 1</p> <p>Amongst the horse riders who took part in the survey, 39% had taken no other form of physical activity in the last four weeks. This highlights the importance of riding to these people, who might otherwise be sedentary.</p> <p>Horse riders with a long-standing illness or disability who took part in the survey are able to undertake horse riding and associated activities at the same self-reported level of frequency and physical intensity as those without such an illness or disability.</p> <p>For further information, please see:</p>	

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	<p>1Sport England (2010) Active People Survey (2010/11)</p> <p>https://www.bhs.org.uk/~media/documents/marketing/health-benefits-of-riding-in-the-uk-fullreport.ashx?la=en</p> <p>https://www.bhs.org.uk/~media/documents/access/access-leaflets/statisticsarow-1119.ashx?la=en</p> <p>g. The psychological and social benefits of horse riding:</p> <p>Horse riding stimulates mainly positive psychological feelings. Horse riders are strongly motivated to take part in riding by the sense of well-being they gain from interacting with horses. This important positive psychological interaction with an animal occurs in a very few sports. Being outdoors and in contact with nature is an important motivation for the vast majority of horse riders.</p> <p>We would urge Calderdale Metropolitan Borough Council to incorporate the principles set out in this guidance into their planning policy: most particularly, that equestrians should be considered and consulted with at an early stage within the planning of any major housing or infrastructure development. This should include any proposed new multi-use routes.</p> <p>“The use of former railway lines and tracks for recreational purposes (including walking, cycling and horse riding) or for potential public transport use should the opportunity arise in the longer term.” where proposed new bridleways, when implemented, should restore connectivity within the wider RoW network in a way that will benefit all users, including equestrians.</p> <p>h. Site Specific Comments. Reasons for Objection.</p>	

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>We noted that there are some incorrectly recorded and unrecorded public rights of way these are: Footpath Brighthouse 072 also named Clough Lane an application to upgrade the status to bridleway has been made to Calderdale Rights of Way. We also noted that a route named as Birkhouse Lane carries historical highway rights an application to add these rights has also been made. We ask that the intended cycleways and any other multi user routes should include horse riders.</p> <p>May I draw your attention to National Planning Policy Framework.</p> <p><i>Para 100: Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.</i></p> <p>CONCLUSION</p> <p>“Good growth also means providing open space and leisure opportunities to encourage healthy and active lifestyles and encouraging more of us to use active forms of travel”.</p> <p>Horse riding is a year-round activity which (along with associated activities such as mucking out and pasture maintenance) expends sufficient energy to be classed as moderate intensity exercise. The majority of those who ride regularly are women, and a significant proportion of riders are over 45. For some older or disabled people, being on horseback or in a horse-drawn carriage gives them access to the countryside and a freedom of movement that they would not otherwise be able to achieve. There are also considerable psychological and social benefits from equestrian activities, as</p>	<p>All Rights of Way within the site boundary are illustrated on the map within Section 3 of the Draft Thornhills Community Masterplan SPD. Any planning application affecting a right of way will be determined in consultation with Highways colleagues, who will liaise with the Rights of Way officer.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>the BHS is demonstrating through the Changing Lives through Horses initiative.</p> <p>Equestrianism is a popular activity in Calderdale, and one which contributes significantly to the local economy. The equestrian community in Brighouse currently has many difficulties in finding safe access within the area. Many issues could be addressed and resolved through good planning of future development.</p> <p>Furthermore, we would ask the Council, to consider using some of the CIL money arising from future developments to improve the off-road network for higher status users of the PROW in the surrounding area which would benefit both the existing and new residents. A community horse arena could also be provided an example of a successful community arena can be found here https://www.nationaltrail.co.uk/en_GB/attraction/friezi-and-arena/</p> <p>If you have any questions or would like to discuss any aspect of this response further, please do not hesitate to contact me.</p> <p>When the above site-specific issues (h) have been dealt with we will remove our objection.</p>	
<p>1106506</p> <p>Kelvin Lawton</p>	<p>THMP11</p> <p>Why has this lengthy consultation document been published and distributed at a time when many people were still on summer holidays? Calderdale Council has an infuriating habit of doing this with a number of Local Plan consultations.</p>	<p>The Town and Country Planning (Local Planning) (England) Regulations 2012 require a Local Planning Authority to undertake public consultation on draft SPDs for a minimum of four weeks, and to take account of any comments received in preparing the final documents.</p> <p>Cabinet considered the draft SPD at its meeting of 7th August 2023 and authorised a four-week public consultation in compliance with regulations.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	Why have no representative members of the Clifton and Thornhills communities not been involved in drawing up such a document?	<p>Many comments were received from various stakeholders on the allocation of the site in the Local Plan. The issues raised during the Local Plan preparation informed the resulting Site Specific Considerations in Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road, Brighouse, many of which were recommended as Main Modifications by the Inspector, and it is these on which the SPD has built.</p> <p>This SPD consultation is an opportunity for all stakeholders to make comment on the draft documents and help shape the final Masterplans and Design Codes.</p>
	How does this document comply and/or reflect the government's Garden Communities guidance?	Refer to paragraph 1.3.12 of the Draft Thornhills Garden Community Masterplan SPD
	This masterplanning has had no involvement at all with local community. It has ignored the thousands of comments and representations made during the Local Plan process.	<p>Many comments were received from various stakeholders on the allocation of the site in the Local Plan. The issues raised during the Local Plan preparation informed the resulting SSCs in Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road, Brighouse, many of which were recommended as Main Modifications by the Inspector, and it is these on which the SPD has built.</p> <p>This SPD consultation is an opportunity for all stakeholders to make comment on the draft documents and help shape the final Masterplans and Design Codes.</p>
	The whole document is riddled with "shoulds", "coulds", "mays" "if possibles" and "if practicals". From local and national experience we know that developers will choose cheap options and totally disregard these nebulous guidelines. A compliant Calderdale Council will roll over and allow this and let profit-driven builders to get on with it. In the past few days alone there have been national reports of house builders reneging on agreements to provide agreed percentages of affordable	Throughout development of the masterplan and design code documents, careful consideration has been given to the choice of wording and the implications this may have. The Calderdale Local Plan is ultimately the policy framework upon which these documents are based, any planning application will therefore need to be in conformity with these policies - it cannot go further or introduce policy. A delicate balance must be achieved in providing supplementary guidance and avoiding producing a

Consultee	Comment	Council response and SPD amendment (where applicable)
	housing in their developments. How will the Council regulate and insist that developers keep to their agreements?	rigid set of parameters that results in an unusable document and could in turn stymie delivery of the Garden Community. Development should be built in accordance with an approved planning application. If a developer wishes to make amendments, then they must re-apply to the Council, or risk enforcement action.
	<p>There is scant detail on the access to residential development and a primary school from the Clifton Common end of Thornhills Lane. How will the road cope with the influx of traffic and the well known habits of parents parking to drop off and collect pupils?</p> <p>A reference to traffic - calming measures provides no details. Will the narrow Thornhills Lane be a one way system? How will traffic be calmed?</p> <p>How will you reduce traffic on Thornhills Lane when you intend to allow access to residential parcels and a primary school situated off the lane?</p>	This has been considered in consultation with traffic colleagues and the provision is considered to be appropriate. It is not good practice to provide substantial parking for parents and guardians as it further encourages the use of the car. The active travel routes will allow many trips to be undertaken on foot. Should parking be an issue a Traffic Regulation Order could be promoted to provide parking restrictions on adjacent streets.
	<p>Cycle paths and walkways are to be encouraged and applauded. This will be fine when travelling down the slopes to Brighouse. Only the most athletic cyclists and walkers would attempt to make the return trip.</p> <p>The only hard proposals I can find in the document re transport are for a half hourly bus service into Brighouse and efforts to "enhance the traffic arrival experience".</p>	Comment noted
	In terms of proposed infrastructure, where is the promised healthcare provision which we were assured would be provided. I cannot find any mention of this in the document.	Refer to paragraph 6.2.9 of the Draft Thornhills Garden Community Masterplan SPD regarding provision of on-site healthcare.

Consultee	Comment	Council response and SPD amendment (where applicable)
	The recommendations regarding the Thornhills local centre are underwhelming in terms of the proposed facilities and, once again, there is no clear commitment that they will be provided.	
	The document states that all new development should be sensitive to and respect existing occupiers. How will the provision of a Primary School at the top of my garden not have a "significant adverse impact on the living conditions....of my privacy etc"?	All planning applications will be assessed against the Local Plan Policy BT2 - Privacy, Daylighting and Amenity Space and Annex 2 - Space About Dwellings with regards to residential amenity for new and existing residents.
	This is a long and complicated document which as a layman is not easy to assimilate. There are some laudable principles and features which could enhance community living. The lack of detail and understanding of local traffic and highway issues is apparent. The fear is that, as we have seen on many large scale developments, both locally and nationally, is that developers will cut costs, will not adhere to agreements and we will be left locally with twenty years of uncontrolled development and disruption, resulting in a sprawl of housing estates covering what once was a unique and attractive mixed urban and rural area in the Brighouse district.	Comment noted
1138084 The Coal Authority – Melanie Lindsley	THDC13 & WOMP31WODC14, THMP12 Dear Sir/Madam Thornhills Garden - Masterplan and Design Code Supplementary Planning Document Consultation Thank you for your notification received on the 25 th August 2023 in respect of the above consultation. The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, The Coal Authority has a duty to respond to	

Consultee	Comment	Council response and SPD amendment (where applicable)
	planning applications and development plans in order to protect the public and the environment in mining areas.	
	Our records indicate that within the area identified in the Masterplan for Thornhills Garden there are coal mining features present at surface and shallow depth including; 27 mine entries, coal workings, surface mining and reported surface hazards. These features pose a potential risk to surface stability and public safety.	
	The Coal Authority's records also indicate that surface coal resource is present in the area, although this should not be taken to imply that mineral extraction would be economically viable, technically feasible or environmentally acceptable. As you will be aware those authorities with responsibility for minerals planning and safeguarding will have identified where they consider minerals of national importance are present in your area and the related policy considerations. As part of the planning process consideration should be given to such advice in respect of the indicated surface coal resource.	Planning applications will be considered with reference to Local Plan Policy EN3 – Environmental Protection , which addresses potentially unstable land.
	The Coal Authority is of the opinion that building over the top of, or in close proximity to, mine entries should be avoided wherever possible, even after they have been capped, in line with our adopted policy: https://www.gov.uk/government/publications/building-on-or-within-the-influencing-distance-of-mine-entries	Planning applications will be considered with reference to Local Plan Policy MS2 – Minerals Safeguarding Areas .
	The Coal Authority are pleased to see that the recorded mine entries are identified in the Masterplan document on 'Map 3 Site Constraints and Opportunities. We would expect the exact location of the mine entries, as established by intrusive site investigations carried out on site, to be used to inform the layout of any built development proposed in this area. The layout of	Comments noted – detail particularly relevant at planning application stage where parcel layout will be proposed, and a Coal Mining Risk Assessment will be required. The Coal Authority will be consulted on phased planning applications.

Consultee	Comment	Council response and SPD amendment (where applicable)
	any development should ensure that adequate separation is provided between these features, their calculated zones of influence and any buildings proposed. It should be noted that these features and their zones of influence may have an impact on the quantum of development that can be accommodated on the site.	
	We also welcome the notification within the Masterplan document that a Coal Mining Risk Assessment will be required, as set out in Appendix 2 - Validation Requirements. When any part of the site which falls within the defined Development High Risk Area, is being considered a Coal Mining Risk Assessment should be submitted to support any planning application for the development proposal. Where the layout of the development is being formally considered the Risk Assessment should include the findings of intrusive investigations to locate the mine entries and assess their condition. The proposal should demonstrate that the findings of these investigations have been used to inform the layout and that building over and within influencing distance of these mine entries is avoided. This document should also set out any works necessary to remediate the coal mining features present (mine entries and shallow coal workings) in order to ensure the safety and stability of the development.	Noted
	Where surface coal mining has taken place within the site and surface highwalls are present from the extraction works we would also expect the risks these pose to development proposals, in respect of differential settlement, to be considered. When layout is being considered we would expect this to be informed by the location of the surface mining highwalls in order to ensure that buildings are not proposed to straddle these features. This information, the location of the highwalls etc,	Noted

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	<p>should be included within the submitted Coal Mining Risk Assessment.</p> <p>Please do not hesitate to contact me should you wish to discuss this further.</p>	
<p>1104200</p> <p>Jennifer Rowlands</p>	<p>THMP13</p> <p>Dear sir/madam</p> <p>Once again I find myself reiterating my concerns regarding the plan for a “garden suburb” for Clifton.</p> <p>Surely we already have a wonderful green belt area which is enjoyed by the residents of Brighouse to think that an estate of around 2000 houses on green belt is going to be a garden suburb is an insult to our intelligence.</p> <p>The roads around Brighouse are choked with traffic at peak times as it is, the rural road jay house lane, which connects this proposed developments is already suffering subsidence and is in danger of slipping into the beck as was demonstrated only a few weeks ago when a tree lost its footings and collapsed taking all the fence with it. It was pure luck it didn’t fall the other way and land on a car. The farmer has replaced the fence but nothing has been done to stabilise the road.</p> <p>With the increased traffic a development of this size would create its an accident waiting to happen.</p> <p>The flowery descriptions accompanying the proposal say nothing about the wildlife that is going to be destroyed by this proposal and the inference that we are all going to travel by bicycle or on foot is ridiculous considering the steep gradient out of Brighouse.</p>	<p>The principle of development on this site was the subject of in-depth discussion throughout the Local Plan examination process. As a result, the land was removed from the Green Belt and allocated as a Garden Suburb on adoption of the Local Plan (22nd March 2023).</p> <p>The purpose of this consultation was not to seek comments on the principle of the allocation, but for comments to be made on the Supplementary Planning Document (SPD), which establishes the broad principles to show how the Garden Community should be designed, translating the policy requirements of the Local Plan into a well-designed and successful place.</p> <p>Planning applications will need to be in conformity with the policies in the adopted Local Plan - the detailed Site Specific Considerations for this allocation listed in Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road, Brighouse, and the wider policy framework which covers matters such as air quality, design, biodiversity, open space and design of highways and accesses.</p> <p>The SPD builds on the policies in the Local Plan and provides a detailed breakdown of the specific measures required to mitigate the impacts of development, their funding strategies, and their likely delivery timeframes.</p>

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	<p>To be realistic 2000 houses will create at least another 2000 cars coupled with the proposed 1200 houses and cars from the wood house development that's a potential 3200 cars and that's allowing one car per household most have two cars these days. The traffic at a standstill will do nothing for the already poor air quality around Brighouse .</p> <p>I just see this plan as pie in the sky and realistically unworkable without proper infrastructure being put in place first.</p>	
<p>817527</p> <p>Nicola Denford</p>	<p>THMP14 & THDC14</p> <p>Consultation for the Garden Communities Supplementary Planning Documents (SPDs)</p> <p>Calderdale Local Plan - Thornhills Garden Suburb Site (LP1463)</p> <p>-Thornhills Garden Community Masterplan SPD</p> <p>- Thornhills Garden Community Design Code SPD</p> <p>Following is what we are being "sold" in the Planning Documents:</p> <p><i>"The vision for Thornhills and Woodhouse Garden Communities is of A Place in Balance. A place to live and work alongside nature, one that integrates the natural landscape within every neighbourhood. A place that is in harmony with its surroundings.</i></p> <p><i>Calderdale Garden Communities will promote a sustainable way of living. The communities will include homes for all, new schools, community facilities and shops as well as a mosaic of landscape spaces - all easily and safely accessible by cycling and walking. Streets will be designed for people over private vehicles. They will be places where active travel and public</i></p>	<p>The principle of development on this site was the subject of in-depth discussion throughout the Local Plan examination process. As a result, the land was removed from the Green Belt and allocated as a Garden Suburb on adoption of the Local Plan (22nd March 2023).</p> <p>The purpose of this consultation was not to seek comments on the principle of the allocation, but for comments to be made on the Supplementary Planning Document (SPD), which establishes the broad principles to show how the Garden Community should be designed, translating the policy requirements of the Local Plan into a well-designed and successful place.</p> <p>Planning applications will need to be in conformity with the policies in the adopted Local Plan - the detailed Site Specific Considerations for this allocation listed in Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road, Brighouse, and the wider policy framework which covers matters such as air quality, design, biodiversity, open space and design of highways and accesses.</p>

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	<p><i>modes of transport are the most convenient, appealing, and efficient choices for short journeys."</i></p> <p>This all reads very well, but the reality is completely different. Apart from the inclusion of specific site maps and photos of the local area, the whole of this document could be used (and probably has been used) as a blueprint for any number of large housing estates which have been built and are in the process of being built, anywhere in the country. The wording throughout is simply ticking planning boxes, but in no way does it address the specific failings in respect of Calderdale's Local Plan concerning inadequate highways infrastructure and key issues of local topography, which render the proposals of 'active travel' completely useless.</p> <p>General Comments regarding the Thornhills Garden Suburbs</p> <p>-Reasons not to develop the land at Thornhill (and these comments also relate to Woodhouse):-</p> <p>Green Belt:</p> <p>This proposed "Garden Suburb" is situated in an area of green belt, which should be preserved. The Council spent months reviewing all the green belt sites in Calderdale and in respect of the land at Clifton, the outcome for much of the land was "Most Sensitive Green Belt Parcel". Why would land classed as "Most Sensitive" be put forward for development – in the case of LP1463, the largest proposed development in the whole of Calderdale?</p> <p>Calderdale should look to develop brownfield sites and to regenerating disused sites.</p>	<p>The SPD builds on the policies in the Local Plan and provides a detailed breakdown of the specific measures required to mitigate the impacts of development, their funding strategies, and their likely delivery timeframes.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>Open Space/Wildlife:</p> <p>This area is used recreationally, not only by people from Clifton and Brighouse, but also by people from further afield - for cycling, horse riding, walking, dog walking etc.</p> <p>This area of unspoilt green belt is home to an abundance of wildlife: foxes, deer, hedgehogs, hares, bats - not to mention multiple species of birds, which have been allowed to thrive in the areas of open farmland, hedgerows and woodland. The proposed plan to build up to 2,000 houses on this land will wipe out the habitat of these creatures, despite any “attempts” to mitigate the loss.</p> <p>Thornhills is an historic hamlet with the lane itself having been an original coach road.</p> <p>Air Pollution:</p> <p>Traffic in Brighouse is overly congested, and this is with current levels of housing/vehicles. Standing traffic and the proximity of the M62 motorway create high levels of air pollution, which are a threat to residents’ health. There is a proven correlation between poor air quality and adverse health impacts. How does the council intend to mitigate this given all the development that is going to take place in Brighouse and the additional traffic which will ensue?</p> <p>Infrastructure:</p> <p>The Council’s Transport model is entirely inadequate and completely underestimates current and future levels of traffic.</p> <p>The Local Plan proposes major Garden Suburb developments in Brighouse, where crucial highways infrastructure is currently</p>	

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	<p>lacking and - going forward - is not committed and without any clear delivery plan. In fact, one third of the allocations for Calderdale is to be on 2 sites, which do not have the required infrastructure in place, nor has this infrastructure been adequately planned to be implemented prior to any building taking place. In other words, these sites are currently not deliverable.</p> <p>Junction 25 and the current road infrastructure in Brighouse cannot adequately cope with current levels of traffic, and will clearly be unable to cope with additional traffic, whether it be from increased housing or increased employment development.</p> <p>Additionally, local schools, doctors, dentists etc are oversubscribed – all of which must be addressed to cope with the demands of growing population due to increased housing proposals.</p> <p>There is no provision for a Health Centre, nor a Dentists Surgery in these proposals, which is a huge failing.</p> <p>-The above points – the most critical being the highways infrastructure - require addressing in full, before any developments can be realistically planned and delivered and it astounds me that after numerous consultations and a full official Inspection of the Local Plan, the valid and well-expressed arguments from Calderdale residents are time and time again ignored.</p> <p>-Brighouse is not the largest town in Calderdale, yet it has been selected by the Council for the largest number of houses and the largest sites (2,000 houses in Clifton and 1,500 in Woodhouse).</p>	<p>Refer to paragraph 6.2.9 of the Draft Thornhills Garden Community Masterplan SPD regarding provision of on-site healthcare.</p>

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	<p>Of course, Calderdale needs more housing, but this should be allocated across the whole Borough, to benefit all areas.</p> <p>-Will the proposed houses be occupied by people who work in the Borough? There is an argument to support the fact that building homes near a motorway junction is highly likely to attract house buyers who work in Leeds and Manchester, rather than those who plant to live and work in Calderdale.</p> <p>-It is evident from the documents that there is a huge emphasis in the plans on these Garden Communities not being reliant on cars. "Active travel" is frequently mentioned throughout the proposals. Much as I would like to believe that this could be implemented, unfortunately, due to the topography of the area, there is very little chance of more than a handful of people cycling or walking into Brighouse and back up Clifton Common! It is far more likely that each house will have at least 1 and more than likely 2 cars and that the whole of the development will be car-dependent.</p> <p>I read the following in an earlier statement from Calderdale: "all of Brighouse, including Thornhills Lane and Woodhouse sites, Is accessible from the town centre by a 15-minute cycle journey</p> <p>Both Thornhills Lane and Woodhouse sites are 20 mins walk from the bus station". I think, when looking at the map, they may not have factored in the gradients!!!</p> <p>It also appears that any proposed bus services won't be implemented until later in the development, due to funding issues and estimated lack of demand.</p> <p>-Schools: I note that both the Woodhouse and Thornhills proposals mention the provision of a Primary School at each site – being paid for by Roof Tax. It would be interesting to know the</p>	

Consultee	Comment	Council response and SPD amendment (where applicable)
	pupils from these schools will go, after year 6, when both the local High Schools are fully subscribed?	Significant changes in preferencing patterns have occurred which has resulted in far fewer extra district pupils seeking provision within Calderdale. This has released capacity in the Lightcliffe area. Developments in neighbouring Kirklees have also been delayed. Additional capacity will only be provided if required and will be based upon need (not demand) at the time that developments are in the delivery stage
	<p>Document-Specific Comments regarding the Thornhills Garden Suburbs</p> <p>Note: the wording in italics is taken from the actual documents.</p> <p><i>“Potential for main vehicular access points into site from Highmoor Lane (A643) and secondary access point from Thornhills Lane (with restriction on vehicle numbers).”</i></p> <p>Comment: Highmoor Lane is a busy road – particularly at peak times and when the M62 has lane closures in the vicinity of Junction 25, which is quite often. At busy times, the access points from Highmoor Lane could potentially be dangerous.</p> <p>The secondary access point from Thornhills Lane is not a good solution, as the Lane is narrow. Additionally, I am not sure how a restriction on vehicle numbers would be implemented.</p>	<p>The safety and capacity of the road network has been considered. A Road Safety Audit will be required with the access design. Local roads are not designed to accommodate occasions when there are incidents on the motorway network.</p>
	<p><i>“Existing lanes running through the site – Thornhills Lane, Thornhills Beck Lane and Jay House Lane – could be traffic calmed to make them more pedestrian and cycle friendly and discourage rat running.”</i></p> <p>Comment: Thornhills Lane, Thornhills Beck Lane and Jay House Lane are already used a rat runs on a daily basis, which is dangerous due to there being several blind bends and very narrow single-track sections of road. Thornhills Lane is a single-track country lane.</p>	<p>The Council cannot prejudice the findings of any consultation process. Other measures may be adopted to achieve these aims so the use of “could” is appropriate</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>The document mentions that these Lanes could be traffic calmed. Could needs replacing with must, and ideally the traffic should be restricted. These Lanes are already dangerous, due to rat running (at speed!) and any additional traffic at all will clearly exacerbate this. Currently the Lanes are not safe for cyclists, pedestrians, dog walkers, horse riders, etc.</p>	
	<p><i>“Provide attractive, ecologically rich buffer planting to existing dwellings within the site and around the boundary. Alternatively, sensitively integrate them into the new street scene, as appropriate.”</i></p> <p>Comment: To protect the unique character of Thornhills hamlet (and indeed any of the existing dwellings), more space is required as a buffer between these and any proposed new housing, in addition to dense buffer planting. Integration of existing housing into the “new street scene” would definitely not be appropriate!</p> <p>Building should not be planned near or next to existing dwellings in the hamlet.</p>	<p>Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road, Brighouse of the Local Plan requires the ‘masterplanning to ensure designs safeguard the character and identity of the Thornhills hamlet and the wooded valley slopes’. Paragraph 7.2.7 of the Design Guide states that ‘Development will need to sensitively respond to the character of the existing settlement and lane with a more rural, village character along these edges which is likely to be achieved through a combination of landscape screening, reduced density of development and careful selection of housing typologies and layouts’. In addition, please see requirement for a Landscape and Visual Impact Assessment to be submitted with each phased planning application.</p> <p>The Local Plan also contains various policies that will reinforce the requirement of Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road, Brighouse, specifically Policy BT1 – High Quality Inclusive Design which ensures schemes respect and enhance the character and appearance of existing buildings and surroundings. Further, while the northern part of the allocation is heavily constrained by factors including topography, proximity to heritage assets and ecological significance, it also ensures that attractive landscape features are maintained and serves to safeguard the character and identity of the Thornhills Hamlet and wooded valley slopes. Please also refer to paragraph</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
		5.5.13 in the Draft Thornhills Garden Community Masterplan SPD for additional detail.
	<p>-Within the Planning Documents, I note that there are 4 pockets of proposed “self-build” sites – site references S1, S2, S3 and S4.</p> <p>These sites are all close to existing properties and are totally unnecessary if you take into account the vast number of houses being proposed over the whole Garden Suburb.</p> <p>Additionally, it would appear that access to all 4 of these sites would be from existing country lanes: Thornhills Lane and Thornhills Beck Lane, which are too narrow for this.</p>	<p>The Council has a duty to meet the need for self and custom housebuilding. The self-build plots on this site contribute to meeting this need, in line with Policy HS5 – Self-Build and Custom Housebuilding of the Local Plan and the demand expressed on the Self Build Register.</p>
	<p>-The Primary Route (including bus route) through the site appears to be positioned far too close to existing housing – particularly where it cuts through sites M4, R14 and R4. From a point of view of existing residents, the route should not be visible or audible.</p>	<p>The site includes several areas identified as part of the Calderdale Wildlife Habitat Network. Development will not be permitted in a Wildlife Habitat Network if it would damage the physical continuity of the Network; or impair the functioning of the Network by preventing movement of species; or harm the nature conservation value of the Network. An ecological review of the Wildlife Habitat Network has been carried out as part of the masterplanning process.</p> <p>The additional traffic has been considered and the ability of the local road network to accommodate the movements has been assessed, in terms of both width and traffic flow. The speeds and frequencies of bus services will mean that there will be negligible environmental impacts such as noise and vibration. Environmental Health will be consulted at detailed planning application stage.</p>
	<p>-Additionally, it appears that site R14 and the Primary Route shown are planned on the Wildlife Habitat Network! This surely needs addressing</p>	<p>Maintaining the ecological functioning of the Wildlife Habitat Network will be considered at the planning application stage. Existing boundary habitats will be retained and enhanced where possible.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
		<p>Policy GN3 – Natural Environment of the Local Plan provides the policy framework for achieving better management of the natural environment.</p> <p>As referenced in Appendix 2 - Validation Requirements of the Draft Thornhills Garden Community Masterplan SPD, ecological surveys and reports, including bat surveys will be a validation requirement on phased applications.</p>
<p>1341118</p> <p>Christine Ogden</p>	<p>THMP15</p> <p>Re the Thornhills Garden Community Masterplan (and, indeed, the entire Garden Suburbs Consultation)</p> <p>In the case of many previous consultations, the council has staged a public engagement event to enable local residents to understand the proposal and have an opportunity to ask questions and give feedback.</p> <p>Given the volume of documents in this consultation process and the short timescale of the proposal, such a public event is essential in order for the consultation to have been carried out openly, fairly and thoroughly.</p>	<p>The Town and Country Planning (Local Planning) (England) Regulations 2012 require a Local Planning Authority to undertake public consultation on draft SPDs for a minimum of four weeks, and to take account of any comments received in preparing the final documents.</p> <p>Cabinet considered the draft SPD at its meeting of 7th August 2023 and authorised a four-week public consultation in compliance with regulations.</p>
<p>1341236</p> <p>Sport England Stuart Morgans</p>	<p>THMP17</p> <p>Doc - THDC17_Calderdale Thornhills Garden Settlement Design Code - Sport England Sept 23_COMMENTS.pdf</p> <p>Calderdale Council Garden Communities Supplementary Planning Documents (SPD's)Public Consultation, September 2023 - Sport England Comments</p> <p>Thornhills Garden Community Masterplan SPD</p>	<p>Noted.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>Sport England wishes to make the follows comments in relation to the proposed draft SPD:</p> <ul style="list-style-type: none"> • Sport England welcomes the proposal to put in place an SPD to guide the development of the Thornhills Garden Community. We note that there is an allocation for up to 1998 dwellings in Policy SD6 of the adopted Calderdale Local Plan. 	
	<ul style="list-style-type: none"> • Introduction – In respect of citing relevant national and local policies, Sport England would advocate that our Active Design Guidance is relevant and should also be considered. This sets out 10 core principles for the design of our environments to lead to more physically active and healthy lives. We would advocate that the policy proposals in the SPD are reviewed against our Active Design checklist. Further information can be found here: https://www.sportengland.org/guidance-and-support/facilities-andplanning/design-and-cost-guidance/active-design 	<p>All phased planning applications will be assessed against adopted policies in the Local Plan, including Policy IM4 – Sustainable Travel and HW2 – Health Impact Assessments.</p> <p>The above policies, together with advice in the SPDs, with particular reference to Active Travel principles and the Council's corporate Green and Healthy Streets policy embed the referenced Active Design Guidance.</p> <p>Further, Active Travel England will be consulted as part of any forthcoming application where there will also be a requirement for the submission of a Health Impact Assessment.</p>
	<ul style="list-style-type: none"> • Vision and Core Objectives - We support the reference to green blue and wild infrastructure, with there being reference to Protect, Enhance, Connect. We would advocate the inclusion of the work Provide to this principle. We also wish to support the inclusion of Active Travel enhanced connections to include walkable and cyclable connected places. For the design principles, we would recommend a minor wording change to 7) to read making active travel the preferred and easy choice. 	<p>Noted – modification agreed</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<ul style="list-style-type: none"> • Land Use – Related to the comments below, we are concerned that the masterplan does not require on site provision of new playing fields within the proposed development. We note the inclusion of a primary school with associated school playing field/sports provision. • Landscape and Open Space – as above, the lack of provision on on-site playing fields is a concern. 	This is confirmed and the intention. Further consideration of anticipated uses and users of the community facility will be undertaken through consultation to inform the design brief.
	<ul style="list-style-type: none"> • Local centre and community facilities – we support the inclusion of a community hall within the proposed local centre. We would advocate that this provides capacity for sport and physical activity, which should include a suitable multi-purpose space for various activities, for instance, badminton, yoga, keep-fit, dance etc. 	Noted – modification agreed
	<ul style="list-style-type: none"> • Education Provision – We note the inclusion of 1.5ha of land for a new primary school. In respect of para 5.4.5 the 3rd bullet should be amended to require (not simply encourage) the school's sports facilities to be provided for community use out of school hours to ensure this accords with policy GN6 III of the adopted Local Plan. • Green Infrastructure – We note that para 5.5.5 explains that whilst it is the intention for all open space to be provided on-site, the open space schedule indicates a policy shortfall in terms of playing pitch and sports provision. In line with Policy GN6, therefore the Council will expect a financial contribution to be made to enable the creation of or enhancement to facilities in the local area. The level and nature of the contribution will be managed through the section 106 agreement. 	Policy GN6 – Protection and Provision of Open Space, Sport and Recreation Facilities of the Local Plan states that all new residential developments should provide for the recreational needs of the prospective residents, by providing, laying out and maintaining recreational and amenity open space of a scale and kind reasonably related to the development within an agreed timescale or, where on site provision cannot be delivered, by way of a financial contribution to improving local off-site provision.
	Sport England wishes to comment as follows:	Comments regarding the Playing Pitch Strategy are noted. These are however outside the scope of this SPD consultation.

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>i) We support the overall intention to ensure that the proposed development addresses the needs of the development.</p> <p>ii) The Council does not have an up to date Playing Pitch Strategy, the existing 2017 strategy would now be deemed out of date. We are aware that the Council are looking to commission a new Playing Pitch Strategy.</p> <p>iii) We would advocate that the scope of the new PPS should include assessing how best to meet the needs of the proposed development, including assessing whether there is any spare capacity in the existing supply of pitches to meet the additional demand, and/or the extent to which new provision/improvements to existing provision are required to build additional capacity to meet the additional demand. Where additional provision is deemed to be required whether that would be best delivered through on-site provision, off site contributions or a mix of both.</p> <p>iv) The new PPS should use Sport England's Playing Pitch Calculator tool to assess the demand for pitches and ancillary facilities generated by the proposed development. The tool could then be used to inform the requirements for the proposed development. It is likely that a development of this size will generate demand for at least six pitches and eight changing rooms (this an estimate based on the data from the 2017 PPS, however given that there may have been some growth in demand since that time this would need to be reviewed following completion of the new PPS)</p> <p>v) In the absence of an evidence led approach, we are concerned that the reliance on securing off-site contributions may not deliver sufficient additional capacity in provision of</p>	<p>Sport England will be consulted during the development of the Council's revised Playing Pitch Strategy.</p> <p>Once adopted, the strategy will inform policies in the Local Plan, such as Policy GN6 – Protection and Provision of Open Space, Sport and Recreation Facilities.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)																				
	<p>pitches and ancillary facilities. In our view the proposed approach has not been acceptably justified and demonstrated to meet the demand generated by the proposed development.</p> <p>vi) As such, we would advocate that the SPD is amended to reference that the provision of playing pitches and outdoor sports provision will be informed by a new Playing Pitch Strategy, which may include a requirement for a combination of on-site and off-site provision to meet local needs.</p>																					
	<p>• The development guidelines make no reference to meeting the needs for indoor sports provision. Sport England uses its Sports Facilities Calculator tool to assess the demand generated by proposed developments for sports halls and swimming pools. For the scale of development proposed the demand generated would be modelled as follows:</p> <table><tr><td colspan="2">Swimming Pools</td></tr><tr><td>Demand adjusted by</td><td>0%</td></tr><tr><td>Square meters</td><td>49.97</td></tr><tr><td>Lanes</td><td>0.94</td></tr><tr><td>Pools</td><td>0.24</td></tr><tr><td>vpwpp</td><td>304</td></tr><tr><td>Cost</td><td>£899,951</td></tr></table> <table><tr><td colspan="2">Sports Halls</td></tr><tr><td>Demand adjusted by</td><td>0%</td></tr><tr><td>Courts</td><td>1.31</td></tr></table>	Swimming Pools		Demand adjusted by	0%	Square meters	49.97	Lanes	0.94	Pools	0.24	vpwpp	304	Cost	£899,951	Sports Halls		Demand adjusted by	0%	Courts	1.31	<p>In order to enable regular discussion and update, the Council established a Garden Communities Project Working Group including officers from planning, transport, education, flood risk and ecology. This group met on a regular basis to review and comment on aspects of the Masterplan SPD and associated Design Code SPD as they emerged. Representatives of public sector agencies including Sport England were invited to particular workshops or met individually as appropriate.</p> <p>Such discussion informed the approach identified in the approach established in the masterplan SPD.</p>
Swimming Pools																						
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Consultee	Comment			Council response and SPD amendment (where applicable)
	Halls	0.33		
	vpwpp	385		
	Cost	£820,143		
	<ul style="list-style-type: none"> • The above tables demonstrate that this development will generate demand for swimming pool and sports hall space for community use. Sport England would recommend that the SPD includes a section on indoor sports facility provision and includes a requirement that developers will be expected to make suitable offsite contributions towards sports hall and swimming pool provision/improvements. • As per the above, we would recommend that amendments should be made in respect of para 5.5.15 to address the points raised regarding developer contributions towards playing pitch and sports provision, which subject to the findings and recommendations of a new PPS may include a need for a mix of on-site provision of new playing pitches and ancillary facilities in addition to off-site contributions. • Sport England supports the requirements relating to social value and well-being in section 5.10. • Phasing and Delivery – As above, we recommend amendments to the wording of para 6.2.21 in respect of requirements for playing pitches and sports facilities. 			<p>Where on site provision cannot be delivered, a financial contribution to improving local off-site provision will be sought. Discussion in terms of specific allocation will take place at the planning application stage following consultation with the Council's Open Space Team and Sport England.</p> <p>Once adopted, the Playing Pitch Strategy will inform policies in the Local Plan, such as Policy GN6 – Protection and Provision of Open Space, Sport and Recreation Facilities.</p> <p>The current wording, referring to sports facilities, will not prevent contributions being directed to indoor sports facilities.</p>
	<ul style="list-style-type: none"> • Sport England supports the guidance in section 7 regarding stewardship which should extend to any on-site playing field provision that may be secured as referenced above 			This is confirmed and the intention. Further consideration of anticipated uses and users of the community facility will be undertaken through consultation to inform the design brief.
1329443 Mr Anthony Perryman	THMP18 My first question is why does this Council choose to start this consultation before its completed its business plan for the A641,			The IDP is a “live” document and the schemes listed are subject to change dependent on factors such as viability,

Consultee	Comment	Council response and SPD amendment (where applicable)
Tony Perryman	<p>it makes it very difficult to actually provide meaningful comments on this matter.</p> <p>I have looked at all the documents over the previous years referring to A641 improvement programme, and find some fundamental contradictions. Firstly, where a comparison is made between the following document 2020 IDP (ref CC66) and the 2021 update (ref CC123) with the latest A641 consultation documents, we see in the councils own words, which are described as essential have now been dropped. There has been no explanation why this is the case. What has happened to the A641 - A643 link. The council has consistently argued throughout this process this was important to alleviate traffic congestion and improve air quality. Presumably there will be no improvement and it now probably means there will be a deterioration in both elements.</p> <p>A further issue why has the new two-way link road between Bradford Rd and Barkby Lane (ref BB06), which was supposed to widen the Brighouse end of Clifton Common (ref BG07) and also the replacement bridge over the River Calder at Huntingdon Rd (ref BG15). All of which were considered as essential and would reduce traffic congestion in Brighouse.</p> <p>I would like to understand why these so called essential components of the plan have been dropped.</p>	<p>funding, or whether revised evidence shows a scheme is or is not required. The Inspector commented at some length in her Final Report on the A641 and acknowledged that many of the transport schemes are in the process of developing business cases. The Inspector also acknowledged the specific interventions to deliver the A641 CIP are likely to change, and the Plan includes flexibility to be able to respond to potential changes. In order to ensure phased applications are brought forward in a high quality and comprehensive manner, the council has been required to progress the masterplanning process.</p>
	<p>The plan makes no real reference to how access will be managed to and from Thornhill's lane. This will be essential for the residents in the area.</p>	<p>The map on page 21/22 of the Draft Thornhills Garden Community Masterplan SPD illustrates that only three parcels (R12, R15 and R16) will have access to/from Thornhills Lane. It also discusses in the Opportunities and Constraints section that Thornhills Lane provides a secondary access, but numbers will</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
		be restricted by limiting access to a small number of development parcels.
1341241 Environment Agency Aaron Miles	THMP19 & WOMP41, WODC17, THDC18 Thank you for your consultation on the Masterplan and Design Code Supplementary Planning Documents for the Thornhills and Woodhouse Garden Communities, which we received on 25th August. We have reviewed the available information and we have the following comments to make.	Noted
	Flood Risk Thornhills Garden Community Masterplan & Design Code: We note that the only development within the Thornhills Garden Community Masterplan & Design Code documents that may trigger EA flood risk consultation is the proposed A641 Greenway. The A641 Greenway development class is non-major, and the vulnerability classification is essential infrastructure. As depicted on 1. CONTEXT 1.3 SITE OPPORTUNITIES On page 16 , we think that the trigger EA flood risk consultation because of the following: <ol style="list-style-type: none"> 1. The development may fall within flood zones 2 & possibly 3. 2. Furthermore, we suspect the development may involve carrying outworks or operations within 20 metres of the top of the bank of a Main River. 	FRA included on the list included at Appendix 2 - Validation Requirements of the Draft Thornhills Garden Community Masterplan SPD . The maps in the opportunities and constraints section of the Draft Thornhills Garden Community Masterplan SPD illustrate the location of the Proposed A641 Greenway, which is part of the A641 Corridor Improvement Programme. It will be progressed through the planning process separately. The Environment Agency will be consulted when this scheme is at that stage, and prior to that as part of the development of the Full Business Case submission.

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>If the development involves reprofiling the land, the FRA must evidence no loss in floodplain storage in the design flood event (1% AEP plus climate change). If there is a loss in storage in the design flood event, the FRA must provide mitigation to account for the volume of water displaced, for instance, floodplain compensation mitigation.</p> <p>Where possible, we advise that any development is repositioned to an area of lower flood risk, like flood zone 1.</p> <p>Please note that any development within 8m of the top of Clifton Beck (main river) will also require a flood risk activity permit.</p> <p>Lastly, we note that the Brighthouse Flood Alleviation Scheme (FAS) is operating in and around Wellhome Park close to the Thornhills Garden Community area. If any development may impact or hinder the Brighthouse FAS scheme, we suggest you contact the EA Calderdale Partnership & Strategic Overview team to discuss.</p>	
	<p>Woodhouse Garden Community Masterplan & Design Code:</p> <p>None of the proposed development under the Woodhouse scheme requires EA flood risk consultation. Therefore, we have no further comments.</p>	Noted
	<p>Groundwater & Contamination</p> <p>Thornhills Garden Community Masterplan & Design Code:</p> <p>The development is located on a Secondary A Aquifer (Grenoside Sandstone) with no overlying superficial geology. During the construction phase it would be important to protect this aquifer. We would encourage the developers to produce a</p>	Construction Phase Management Plan likely to be conditioned upon planning approval.

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>Construction Phase Management Plan which takes the sensitive geological conditions into account.</p> <p>In the masterplan document, the site constraints are listed and one these is the former Pickle Bridge railway line which runs along the western edge of the site. Former railways are areas that can often be contaminated. We have also noted that at the southern section of the site there is a former landfill which accepted waste between 1985 and 1992. Our records indicate that the waste accepted was RUBBLE. The provided documents do not mention this. It is important that the developer is aware of the former landfill.</p> <p>If this was to come to us in the form of a full planning application with no further information on the potential contamination, we would object on the basis that there is the potential for contamination and possible risk to controlled waters, but no preliminary risk assessment.</p>	<p>Paragraph 3.1.3 of the Draft Thornhills Garden Community Masterplan SPD, and Paragraph 1.2.3 of the Draft Thornhills Garden Community Design Code SPD have been amended to include reference to this constraint.</p>
	<p>Woodhouse Garden Community Masterplan & Design Code:</p> <p>The development is located on a Secondary A Aquifer (Grenoside Sandstone) with no overlying superficial geology. During the construction phase it would be important to protect this aquifer. We would encourage the developers to produce a Construction Phase Management Plan which takes the sensitive geological conditions into account.</p>	<p>Construction Phase Management Plan likely to be conditioned upon planning approval.</p>
	<p>Drainage at both sites</p> <p>We note that the use of SuD's is proposed for surface water at the development.</p>	<p>Comment noted</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>Please note the following position statement from The Environment Agency's</p> <p>approach to groundwater protection regarding the use of deep infiltration systems of surface water.</p> <p>The Environment Agency will only agree to the use of deep infiltration systems for surface water or sewage effluent disposal if the developer can show that all of the following apply:</p> <ul style="list-style-type: none"> • the discharge to groundwater is indirect (with the exception of clean uncontaminated roof water to ground - see Position Statement G12) • there are no other feasible disposal options such as shallow infiltration systems or drainage fields/mounds that can be operated in accordance with the appropriate current British Standard 6297:2007+A1 :2008 • the system is no deeper than is required to obtain sufficient soakage • acceptable pollution control measures are in place • risk assessment demonstrates that no unacceptable discharge to groundwater will take place — in particular inputs of hazardous substances to groundwater will be prevented • there are sufficient mitigating factors or measures to compensate for the increased risk arising from the use of deep structures <p>For new effluent discharges that meet the above criteria, secondary treatment is required.</p> <p>The Environment Agency will apply position statement G1 to any deep infiltration systems potentially involving the discharge of non-hazardous pollutants. The Environment Agency will encourage operators of existing deep infiltration systems to alter</p>	

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>their facilities so that direct inputs of pollutants are avoided, particularly where there is potential for hazardous substances to enter groundwater.</p> <p>Pollution Prevention</p> <p>These comments apply to both Thornhills Garden Community Masterplan & Design Code & Woodhouse Garden Community Masterplan & Design Code.</p> <p>Regarding the construction phase of the development because there is the potential for pollution to the watercourses that flow through the sites from inadequate surface water drainage. There is also generic advice regarding how dewatering is regulated which may be required during the construction phase.</p> <p>We would recommend the Local Authority request a detailed temporary surface water drainage management system from contractors for the construction phase, after soil and vegetation strip. The management system should detail phasing of the development and phasing of temporary drainage provision and include methods of preventing silt, debris and contaminants entering existing drainage systems and watercourses.</p> <p>During the construction phase it may be that dewatering is required from the site where excavations have been made. Please be aware that dewatering is licenced under the Water Resources Act, this was previously exempt in the past but has since been formalised in the following regulations - https://www.legislation.gov.uk/ukxi/2017/1047/made meaning that any dewatering of over 20 m3/day will require a licence. However you will not need to apply for an abstraction licence in the course of building or engineering works if your activity meets the conditions of the surface water abstraction exemption under</p>	<p></p> <p>The LLFA will require a CSWMP to be provided and implemented to protect the site from pollution and flooding during the construction phase, this is usually requested as a planning condition for large developments during the planning consultation.</p> <p>Modification agreed – Appendix 2 - Validation Requirements.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>Regulation 6 of the Water Abstraction and Impounding (Exemptions) Regulations 2017</p> <p>A key concern is around the 6-month timeline, as all big projects overrun and end up finding things that need more attention. Dewatering is also linked to rainfall and groundwater levels, so it is not always clear how much water is going to be in the ground until you start to dig. Our advice is, if there are any locations where the proposed works have a risk of going over 6 months, the applicant will need a licence. This means work would have to stop while a licence is obtained for the proposed works.</p> <p>Without a licence this is a breach of the regulations, and the Applicant would face enforcement action. If the Applicant needs to start the application process then they will need to speak to psc-waterresources@environment-agency.gov.uk to obtain the necessary forms and determine what they need to apply for. It is also worth bearing in mind that they may need to apply for preapplication, especially for more complex sites.</p> <p>Applicants may also need an environmental permit under the Environmental Permitting (England and Wales) Regulations 2016 for dewatering activities if they discharge liquid effluent into surface waters, for example, rivers, streams, estuaries, lakes, canals, or coastal waters — this is known as a ‘water discharge activity’.</p> <p>However, for discharges of uncontaminated water (such as rainwater) from excavations, an environmental permit is not currently required if the requirements of the temporary dewatering from excavations to surface water regulatory position statement are met. If the Applicant needs to start the application process then they will need to speak to PSC-</p>	

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>waterquality@environment-agency.gov.uk to obtain the necessary forms and determine what they need to apply for.</p> <p>Water Quality</p> <p>Thornhills Garden Community Masterplan & Design Code:</p> <p>According to the Thornhills Garden Community Masterplan supplementary planning document, one of the project constraints it's that there are a number of existing waterways on the site, which will need to be sensitively incorporated into the site- wide landscape and drainage strategy.</p> <p>For this reason, we encourage the inclusion of the Water Framework Directive (WFD) in section 1.3 POLICY CONTEXT. Local planning authorities have an important role when it comes to the Water Framework Directive - making sure new development does not cause deterioration and whenever possible supports measures to improve water bodies. Likewise, NPPF paragraph 174 (e) promotes the use of the River Basin Management Plans (RBMPs) to enhance the environment.</p> <p>Therefore, the Masterplan and the Design Code supplementary planning documents (for both Thornhills and Woodhouse) can benefit from highlighting that applicants must prevent deterioration of the water environment and contribute to its enhancement according to the Humber RBMP goals and delivering actions to achieve “good” status or higher under the Water Framework Directive for the local catchment. Consideration to the quality of the watercourses is especially important given the intent to discharge surface water on one of the existing waterbodies on-site (according to section 5.6 Drainage of both masterplans).</p>	<p>Planning applications will need to be consistent with Local Plan Policy CC3 - Water Resource Management.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	Specifically for the Design Code Planning Documents, we support the inclusion of sustainable drainage in the project as a key design principle of natural spaces within the garden community. We support the requirement for applicants to demonstrate how their design approach has applied the principles of the SuDS hierarchy as set out in the CIRIA SuDS Manual (C753) and that the proposals have maximised opportunities for incorporating SuDS wherever possible, including demonstration of secondary or added value.	
	However, the section 4.5 Blue infrastructure and Sustainable urban drainage system falls short by not mentioning the existence of the waterways on the site. As stated above, WFD and RBMP objectives need to be mentioned and incorporated into any decision making to prevent deterioration and enhance the status of the waterbodies. The WFD and RBMP objectives align with the National Design Guide 'Nature' Characteristic to enhance and optimise nature.	It is noted that the Design Code does not reference the existing watercourses however these will be incorporated into the design of the Drainage Strategy for the whole site and mitigation measures will be required so that the WFD status and RBMP objectives are retained throughout the development process, this will require an appropriate CSWMP and DS.
	<p>In the section 4.6 Biodiversity, the delivery of BNG should consider a catchment- based approach and help to deliver catchment-wide WFD objectives, encouraging the alignment with RBMP priorities.</p> <p>Sediment pollution is of particular risk with housing and large scale land change developments, with potential devastating impacts to the ecology of a river/WFD status especially during rainfall events which are of ever-increasing intensity due to climate change.</p>	<p>Agreed.</p> <p>Proposed additional wording to 4.6.5:</p> <p><i>Watercourse units should be provided within the same waterbody catchment in the first instance. Delivery should have regard to the Water Framework Directive objectives and Humber River Basin Management Plan.</i></p> <p>Agreed.</p> <p>SuDS are a major component to prevent sediment pollution post-development and feature throughout the Design Code.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
		Sediment pollution control for the construction period will be factored into the Construction Environmental Management Plan (CEMP) produced for the site.
	We would like to remind you that it is an offence to cause pollution of watercourses and adequate measures should be incorporated in the construction phase to prevent this. The requirement for appropriate mitigation measures to be in place during the construction phase to not cause pollution to watercourse (given the above circumstances) should be included where applicable (Section 6. Phasing and delivery of the Masterplans, Section 9.3 Design Construction of the Design Code Supplementary document).	The LLFA will require a CSWMP to be provided and implemented to protect the site from pollution and flooding during the construction phase, this is usually requested as a planning condition for large developments during the planning consultation.
	Biodiversity Thornhills Garden Community Design Code: General comments We welcome the ethos of the Calderdale Garden Communities and the principles underpinning them. We believe that the measures detailed in the design document will bring a major improvement in biodiversity at this site.	Noted
	Chapter 1 Context Page 15 - 1.3.2 states Existing waterways on the site should be retained as key features within the open space network. We agree that existing waterways on the site should be retained as key features within the open network but would like to add to this and recommend existing waterways are not just retained but also enhanced. There is a vast scope of enhancements that could be designed in.	Agree. Consider this suggested amendment is consistent with Local Plan Policy CC3 - Water Resource Management .

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>Biodiversity Net Gain — No mention of river units within the BNG section despite BNG having terrestrial and riverine units within the calculation and existing watercourse on and adjacent to site. As there are retained waterways there is an opportunity to deliver riverine units through river restoration and enhancement and therefore, we would like to see a paragraph added to reflect this.</p>	<p>Agreed.</p> <p>Proposed additional wording to 4.6.8:</p> <ul style="list-style-type: none"> • River restoration and enhancement measures including riparian buffer zones, riparian planting and the removal of artificial built encroachment from the banks and channels of existing watercourses.
	<p>Chapter 4. Nature section</p> <p>Page 25 4.3 KEY OPEN SPACES</p> <p>We support 4.3.2 'The key parks and public open spaces will incorporate a mix of retained and proposed trees as well as shrub, annual and grassland habitats'</p> <p>4.3.6 'Tree species could include but are not limited to: Betula pendula (Silver Birch), Fagus sylvatica (Common Beech) and Salix alba (White Willow)'. We welcome this, but would suggest adding other trees species including Pedunculate Oak, Ash (need to source 'die back' resistant forms), Blackthorn, Dogwood, Field Maple, Hawthorn, and Alder (in wetter sites), Yew and Larch. The latter two are to support the mix of deciduous and coniferous species. The John Innes Research Institute are developing die back resistant forms of Ash.</p>	<p>Noted</p> <p>The current wording does not restrict tree planting species to these varieties. This will be refined during the design of the application and would take into account the habitat and species surveys to ensure ecological functions are retained and enhanced. A diverse array of tree species will be selected with consideration of climate resilience and local character.</p>
	<p>Page 42 - 4.6 BIODIVERSITY</p> <p>Biodiversity Net Gain (BNG) assessment</p> <p>We note that the development will be subject to a Biodiversity Net Gain (BNG) assessment, and the mitigation hierarchy applies.</p> <p>We welcome the creation of a range of habit types:</p>	<p>Noted.</p> <p>The planning application will be subject to the same National and Local policies in regard to Biodiversity Net Gain. This will include appropriate assessment of the watercourse units on or within 10m of the site and post-development calculations of proposed habitat creation and enhancement.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<ul style="list-style-type: none"> • Wildflower Grassland (species-rich grassland with some unmown areas). • Mixed Scrub • Reedbeds • Orchards / Allotments <p>Broad-Leaved Woodland (enhancement of existing woodlands via sensitive management such as removing invasive species; providing standing and fallen deadwood habitats; and supplementary planting e.g. Oaks, Willows, Cherry, Silver Birch, Field Maple, Alder); Street Trees (provision of native wildlife-friendly species alongside roads and paths)</p> <p>The Biodiversity Net Gain (BNG) assessment needs to provide values on how much area of habitat and linear habitat will be created. In addition, there are watercourses within and adjacent to the sites, the metric needs to be surveyed to assess how the various river units could be improved.</p> <p>4.6.19 Notable species — does not mention otter or fish, are there opportunities to have otter on the watercourse and therefore could more be done to counteract any impacts. River restoration could improve fish populations or barriers could be removed or altered if there are barriers to fish passage present.</p> <p>Lighting to be designed with bats and birds in mind. No lighting of watercourses, wildlife corridors and suds features.</p>	<p></p> <p>There have been no records of these species within the site— further surveys at the application stage may highlight presence or potential opportunities for these which will be factored in accordingly.</p> <p>Design of ecologically sensitive lighting with reference to nocturnal species is included at 4.6.16.</p> <p>Proposed amendment to include reference to watercourses and SuDS:</p> <p>The design of ecologically sensitive lighting must support nocturnal species, particularly in any areas</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
		identified as potential bat wildlife corridors, watercourses and new SuDS features.
	Page 43 - SUPPORTING WILDLIFE In addition to the bird and bat boxes, each new dwelling should contain one swift brick. Bird and bat boxes should be made of woodcrete (a mixture of sawdust and concrete), these are far more robust than nest and bat boxes constructed of wood.	The application will need to adhere to existing CMBC guidance on this, which includes provisions for swifts and other notable bird species.
	Page 44 - RESPONDING TO CLIMATE CHANGE AND BIOSECURITY Responding to climate change section - again could include something regarding river restoration and enhancement, enhancing riparian river corridors, planting buffers adjacent to watercourses, removing/altering barriers to fish passage to make them passable to fish, improvements to habitats to protect species using watercourses.	Agreed. Wording added to Paragraph 4.6.23: <ul style="list-style-type: none"> • Create and enhance habitats within riparian buffer zones where feasible. Appropriate species planting should consider the inclusion of trees to provide riparian shading and cooling effects. • Promote connectivity of the water environment by removing artificial interventions such as barriers to fish passage where feasible.
	Invasive Non-Native Species (INNS) We recommend checking the site for Invasive Non-Native Species (INNS) such as Himalayan Balsam, Giant Hogweed and Japanese Knotweed. An eradication plan should be produced and implemented before development starts.	Surveys for presence of invasive species would be a component of ecological site assessment. If present a management plan to control these would be a required. A Construction Environmental Management Plan (CEMP) will also be required to of which the prevention of the spread of invasive species will be specified.
	Thornhills Garden Community Masterplan Vision and Core Objectives We welcome the ethos of the Calderdale Garden Communities and the principles underpinning them. They believe that the	The principal policy framework against which all phased applications will be assessed is the Calderdale Local Plan. Of particular mention in this instance the Water Framework

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>measures detailed in the design document will bring a major improvement in biodiversity at this site.</p> <p>No mention of Water Framework Directive within policy context in masterplan document.</p>	<p>Directive is referred to Policy CC3 - Water Resource Management.</p>
	<p>Page 10</p> <p>GN3 — Natural Environment</p> <p>1.3.24 The policy seeks to successfully manage the borough's natural environment by conserving and enhancing biodiversity and geological features. The masterplan for the Garden Community is formed around a network of green spaces incorporating existing ecological features such as hedgerows and woodland, while providing opportunities for the creation of a range of different habitat types within a variety of formal and informal landscape spaces.</p> <p>1.2.25 The policy acknowledges that Calderdale's natural environment has an important aesthetic, recreational, cultural and spiritual role as well as aiding education and research and recognises that biodiversity enhancements exist at a range of scales.</p>	<p>Noted</p>
	<p>Page 8 - 1.3.4</p> <p>It mentions Biodiversity Net Gain, but they need to provide 10% of additional terrestrial units and 10% of riverine units. Under the rules, you can't replace habitat type with another.</p> <p>No mention of watercourses</p>	<p>Agreed.</p> <p>The planning application will be subject to the same National and Local policies in regard to Biodiversity Net Gain. This will include 10% net gain in riverine, hedgerow and area habitat units.</p>
	<p>Woodhouse Garden Community design code</p> <p>Chapter 1 Context Page 15 - 1.3.2 states</p>	<p>This is not included in the Woodhouse Design Code, but in Thornhills Design Code. Response as above.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>Existing waterways on the site should be retained as key features within the open space network.</p> <p>Agree that existing waterways on the site should be retained as key features within the open network but would like to add to this and recommend existing waterways are not just retained but also enhanced. There is a vast scope of enhancements that could be designed in.</p>	
	<p>Biodiversity Net Gain — No mention of river units within the BNG section despite BNG having terrestrial and riverine units within the calculation and existing watercourse on and adjacent to site. As there are retained waterways there is an opportunity to deliver riverine units through river restoration and enhancement and therefore, we would like to see a paragraph added to reflect this.</p>	<p>Agreed.</p> <p>Proposed additional wording to 4.6.8:</p> <ul style="list-style-type: none"> • River restoration and enhancement measures including riparian buffer zones, riparian planting and the removal of artificial built encroachment from the banks and channels of existing watercourses.
	<p>4. Nature</p> <p>Page 34.3 KEY OPEN SPACES</p> <p>4.3.6 — could, alter to a range of native tree species</p>	<p>The current wording does not restrict tree planting species to these varieties. This will be refined during the design of the application and would take into account the habitat and species surveys to ensure ecological functions are retained and enhanced. A diverse array of tree species will be selected with consideration of climate resilience and local character.</p>
	<p>4.6 Biodiversity</p> <p>Page 42 Biodiversity Net Gain (BNG)</p> <p>The Biodiversity Team notes that the development will be subject to a Biodiversity Net Gain (BNG) assessment, and the mitigation hierarchy applies</p> <p>We welcome the creation of a range of habit types:</p>	<p>Comment noted.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<ul style="list-style-type: none"> • Wildflower Grassland (species-rich grassland with some unmown areas) • Mixed Scrub • Reedbeds • Orchards / Allotments <p>Broad-Leaved Woodland (enhancement of existing woodlands via sensitive management such as removing invasive species; providing standing and fallen deadwood habitats; and supplementary planting e.g. Oaks, Willows, Cherry, Silver Birch, Field Maple, Alder);</p> <p>Street Trees (provision of native wildlife-friendly species alongside roads and paths)</p>	
	<p>The Biodiversity Net Gain (BNG) assessment needs to provide values on how much area of habitat and linear habitat will be created. In addition, there are watercourses within and adjacent to the sites, the metric needs to be surveyed to assess how the various river units could be improved.</p>	<p>The planning application will be subject to the same National and Local policies in regard to Biodiversity Net Gain. This will include appropriate assessment of the watercourse units on or within 10m of the site and post-development calculations of proposed habitat creation and enhancement.</p>
	<p>4.6.19 Notable species — does not mention otter or fish, are there opportunities to have otter on the watercourse and therefore could more be done to counteract any impacts. River restoration could improve fish populations or barriers could be removed or altered if there are barriers to fish passage present.</p> <p>Lighting to be designed with bats and birds in mind. No lighting of watercourses, wildlife corridors and suds features.</p>	<p>There have been no records of these species within the site— further surveys at the application stage may highlight presence or potential opportunities for these which will be factored in accordingly.</p> <p>Design of ecologically sensitive lighting with reference to nocturnal species is included at 4.6.16.</p> <p>Proposed amendment to include reference to watercourses and SuDS:</p> <p>The design of ecologically sensitive lighting must support nocturnal species, particularly in any areas</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
		identified as potential bat wildlife corridors, watercourses and new SuDS features.
	<p>Page 43 - SUPPORTING WILDLIFE</p> <p>In addition to the bird and bat boxes, each new dwelling should contain one swift brick. Bird and bat boxes should be made of woodcrete (a mixture of sawdust and concrete), these are far more robust than nest and bat boxes constructed of wood.</p>	The application will need to adhere to existing CMBC guidance on this, which includes provisions for swifts and other notable bird species.
	<p>Page 44 - RESPONDING TO CLIMATE CHANGE AND BIOSECURITY</p> <p>Invasive Non-Native Species (INNS)</p> <p>We recommend checking the site for Invasive Non-Native Species (INNS) such as Himalayan Balsam, Giant Hogweed and Japanese Knotweed. An eradication plan should be produced and implemented before development starts.</p>	Surveys for presence of invasive species would be a component of ecological site assessment. If present a management plan to control these would be a required. A Construction Environmental Management Plan (CEMP) will also be required to of which the prevention of the spread of invasive species will be specified.
	<p>Woodhouse Garden Community Masterplan</p> <p>We welcome the ethos of the Calderdale Garden Communities and the principles underpinning them. They believe that the measures detailed in the design document will bring a major improvement in biodiversity at this site.</p> <p>Page 10 - GN3 — Natural Environment</p> <p>1.3.24 The policy seeks to successfully manage the borough's natural environment by conserving and enhancing biodiversity and geological features. The masterplan for the Garden Community is formed around a network of green spaces incorporating existing ecological features such as hedgerows and woodland, while providing opportunities for the creation of a range of different habitat types within a variety of formal and informal landscape spaces.</p>	Noted

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>1.2.25 The policy acknowledges that Calderdale's natural environment has an important aesthetic, recreational, cultural and spiritual role as well as aiding education and research and recognises that biodiversity enhancements exist at a range of scales.</p>	
	<p>Page 8 - 1.3.4</p> <p>It mentions Biodiversity Net Gain, but they need to provide 10% of additional terrestrial units and 10% of riverine units. Under the rules, you can't replace habitat type with another.</p> <p>No mention of watercourses.</p>	<p>Agreed.</p> <p>The planning application will be subject to the same National and Local policies in regard to Biodiversity Net Gain. This will include 10% net gain in riverine, hedgerow and area habitat units.</p>
<p>1341422</p> <p>Jayson Barton</p>	<p>THMP20 & THMP26 Duplicate</p> <p>Please consider my response to the Thornhills Garden Community Masterplan SPD below.</p> <p>Firstly I believe the time given to consider the plans and to pass comment has been insufficient. Despite being a resident of Thornhills, paying council tax with a registered email address I did not receive notice of this consultation formally, neither by post nor email. This is the case for residents within the area, further to this four weeks not sufficient time to digest such an amount of information, consider and compose a response. I suggest holding open forums, properly informing local residents of the surrounding areas of Thornhills and Woodhouse and giving an extended period of time for reply.</p> <p>The first statement I take issue with is: 'Street will be designed for people over private vehicles'. Whilst the sentiment seems nice and fluffy, to appease environmentalists and locals the reality is that if this is the case streets will be too narrow and existing and carriageways insufficient to cope with new demand. Thornhills is conveniently located within close proximity to the</p>	<p>Please refer to the Introduction to this Consultation Statement for the various methods of engagement utilised for the consultation.</p> <p>The consultation ran from 25 August to 25 September. The vast majority of this period was outside of the school summer holidays in Calderdale. The documents were also accessible to view prior to the commencement of the consultation on the Committee webpages as the documents were approved for consultation at Cabinet on 7 August 2023.</p> <p>Refer to paragraph 5.7.5 of the Draft Thornhills Garden Communities Masterplan SPD which sets out the standards for new routes</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>M62 and M606 motorways which already cause heavy congestion in Brighouse, Clifton and Thornhills on a regular basis. New residents to the Garden Suburbs (GS) are most likely going to own 1 or more motor vehicle and will primarily use the aforementioned motorways on a daily basis. If the proposed designs are going to prioritise pedestrians and cyclists over motor users without a significant national cultural change taking place, I predict traffic jams, road traffic collisions and even more pollution that is already created.</p> <p>A key factor not being considered when there are talks of cycleways and walking everywhere is that Thornhills is... as the name suggests on a hill! even with the best planning in world the majority of residents in these suburbs are not going to choose to walk or cycle into Brighouse due the physical demand it would require.</p> <p>The current SPD is greatly lacking in detail surrounding healthcare provision. I think it's a rather large oversight to continue with plans to expand a local population considerably without giving any detail of planned healthcare infrastructure. I for one am concerned specifically about the strain on local GPs and pre/postnatal care specifically, please review the number of midwives and local healthcare visitors that will be required, considering the demographics that will be likely utilising the proposed housing. A second area the plan is lacking is in the provision for a secondary school. I would like to see why the plan has proposed that a primary school is required (albeit smaller than originally proposed) but a secondary school is not? Can we be provided with this information in detail.</p>	<p>Walking and cycling will be encouraged by providing opportunities for such means of travel, and by providing an attractive environment that prioritises active travel modes.</p> <p>Calderdale Council retains a statutory duty to commission school places and ensure that there are sufficient school places in the right areas to meet the needs of the local population. The Council produces a 'Planning for School Places' document annually, highlighting projections for pupil place need in each area of Calderdale showing existing school places alongside the anticipated new demand for places.</p> <p>It is recognised that there is a balance to be achieved in the early phases between the critical mass of the local population creating demand for school places and the provision of local school places for new residents. Pupil projection modelling is an ongoing process and discussion has taken place between the Council's Education Team and the Garden Communities Project Team during the Local Plan examination process and throughout development of the SPDs.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
		<p>With regards to healthcare provision on site, see paragraph 6.2.8 in the Draft Thornhills Garden Community Masterplan SPD</p>
	<p>Throughout the SPD there seems to be a lack of consideration for the specific and real identity of the current Thornhills Hamlet. As the plans stand the hamlet is set to be absorbed as part of a new enclave, we must have assurances that there will be a sufficient buffer zone between existing and newbuilds. A key factor to this is the identification of a protected species (great crested newt) breeding area being discovered within the gardens of the existing housing. This must be recognised by the developer and plans must change to allow a buffer zone, preferably with the creation of more ponds and safe routes of travel for the newts. As plans currently stand this would not be possible as housing is planned to be built against the back fence of the gardens in question. Please provide a significant buffer of at least 50 metres between any existing property and any new build property with a view to protect local wildlife and the distinct identity of the existing hamlet.</p> <p>Please consider the request for more time for consideration seriously as the communication between the council and local residents has been very poor and a significant amount of time is necessary to consider the detail of such a massive plan and provide a proper response.</p>	<p>Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road, Brighouse of the Local Plan requires the ‘masterplanning to ensure designs safeguard the character and identity of the Thornhills hamlet and the wooded valley slopes’. Paragraph 7.2.7 of the Design Guide states that ‘Development will need to sensitively respond to the character of the existing settlement and lane with a more rural, village character along these edges which is likely to be achieved through a combination of landscape screening, reduced density of development and careful selection of housing typologies and layouts’. In addition, please see requirement for a Landscape and Visual Impact Assessment to be submitted with each phased planning application.</p> <p>The Local Plan also contains various policies that will reinforce the requirement of Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road, Brighouse, specifically Policy BT1 – High Quality Inclusive Design which ensures schemes respect and enhance the character and appearance of existing buildings and surroundings. Further, while the northern part of the allocation is heavily constrained by factors including topography, proximity to heritage assets and ecological significance, it also ensures that attractive landscape features are maintained and serves to safeguard the character and identity of the Thornhills Hamlet and wooded valley slopes. Please also refer to paragraph 5.5.13 in the Draft Thornhills Garden Community Masterplan SPD for additional detail.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
		With regards to protected species, planning applications will also be assessed against Policy GN3 – Natural Environment which offers policy protection to protected species.
717694 Mr Edward Spivey	<p>THMP21 & WOMP33, THDC16</p> <p>Firstly, I would urge the Council to discontinue with these Consultations. The pending Judicial Review may lead to the quashing of the Local Plan, and so any time and money (ie. my Council Tax) spent in the meantime will have been wasted. If the Judicial Review is not successful, then the small delay in proceeding with these documents will not be significant. (After all, it's taken 6 years to get to this stage, so what difference would a few months make?) So, stopping consideration of these documents now, would be a sensible decision.</p> <p>Secondly, I am amazed at the Council's gall! The Masterplan, as now shown, does not include any access to the A641. May I remind the Council that in its Evidence to the Examination in Public, the Council stated quite unequivocally that access to the A641 was imperative to the Thornhills housing proposals. In the Council's own words, it was saying in Evidence, that the Thornhills housing could not go-ahead without a road connection to the A641. Yet, here the Council is proposing no such connection! This new layout was not placed before the Inspector. It is contrary to the Council's Evidence. It has not been subjected to any Public scrutiny. This matter must be rectified immediately, and new SPD's prepared.</p>	<p>The Local Plan remains the statutory development plan for Calderdale. Both the Council and the Secretary of State responded robustly to the bid to challenge the Local Plan process, and we will defend the plan's adoption at the hearing.</p> <p>The Inspector acknowledged in her report on the Local Plan that the details of the A641 scheme are evolving, and that investigations to provide an alternative option to the Thornhills Spine Road were being undertaken. She required a main modification to the Plan (Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road, Brighouse) and Appendix 1 – Site Number LP1451 – Land between Bradley Wood and Woodhouse Lane, Rastrick to allow for flexibility to be able to respond to potential changes.</p>
	<p>Masterplan SPD document comments</p> <p>para 1.2.4 notes that "various external stakeholders" attended workshops ...No-one from the Clifton Village Neighbourhood Forum (CVNF) was invited to any of these workshops. As a</p>	<p>Many comments were received from various stakeholders on the allocation of the site in the Local Plan. The issues raised during the Local Plan preparation informed the resulting SSCs in Appendix 1 – Site Number LP1463 – Land between</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>lawfully constituted Planning Forum bounding on the site, the Council should have fully engaged the CVNF throughout the formulation process. Therefore, the Council has made a major procedural error in formulating the SPD. This is either a deliberate attempt by the Council to stifle neighbour input, or shows a major lack of understanding of who should attend the workshops. In either case, the SPD cannot be acclaimed to have been properly formulated with input from CVNF. The SPD should be withdrawn until this major discrepancy has been rectified - and proper, meaningful inputs from all interested bodies included.</p>	<p>Highmoor Lane and Bradford Road, Brighouse and Appendix 1 – Site Number LP1451 – Land between Bradley Wood and Woodhouse Lane, Rastrick, many of which were recommended as Main Modifications by the Inspector, and it is these on which the SPD has built.</p> <p>This SPD consultation is an opportunity for all stakeholders to make comment on the draft documents and help shape the final Masterplans and Design Codes.</p>
	<p>para 4.2.2. The proposed location of the new Primary School does not meet the nationally recognised standards for access on foot ie. within 500m of all its catchment. The idea that it should be near to the existing housing in Clifton shows flawed logic - Clifton already has a Primary School, and so the educational needs of the existing housing is already fully met.</p>	<p>Calderdale Council retains a statutory duty to commission school places and ensure that there are sufficient school places in the right areas to meet the needs of the local population. The Council produces a 'Planning for School Places' document annually, highlighting projections for pupil place need in each area of Calderdale showing existing school places alongside the anticipated new demand for places.</p> <p>It is recognised that there is a balance to be achieved in the early phases between the critical mass of the local population creating demand for school places and the provision of local school places for new residents. Pupil projection modelling is an ongoing process and discussion has taken place between the Council's Education Team and the Garden Communities Project Team during the Local Plan examination process and throughout development of the SPDs.</p> <p>With regards to accessibility to schools, the Education Act 1996 states that a reasonable walking distance for 8 and under is two miles, over 8 three miles.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>4.5 Access and Movement. There is a "restricted access" shown from Kiln Fold into the site. No access for vehicles should be allowed from Kiln Fold. It is a small residential area and the layout is not conducive to allow a road into the site . This should be deleted - although a footpath/cycleway access may be possible.</p> <p>Also, the Council's Evidence at the Examination in Public confirmed that all roads within the site would be constrained to 20mph usage. This was to be by engineering measures, and not through the use of road-humps etc. The Primary Street, as show, does not appear to have the necessary horizontal features to achieve 20mph standards. This should be rectified.</p>	<p>The plan indicates an existing private access. It does not indicate access to the wider site from Kiln Fold.</p> <p>Please refer to Draft Thornbills Garden Community Design Code Section 5.4 Street Hierarchy, where Primary Street-Highway Features are detailed, including traffic calming measures.</p>
	<p>para 5.4.2. National standards suggest that all new dwellings should be within 400m of a bus stop for that bus route to be effective. Other Councils have adopted standards better than this, such as 300m distance. The road network shown will not achieve either of these distances, and is, therefore not acceptable. Given such emphasis on non-car modes of transport, public transport provision must be excellent to all locations. This not the case with these proposals. They must be changed, the '300m maximum walking distance from front door to bus stop' must be explicitly stated .</p>	<p>The approach consistent with Local Plan Policy IM5 – Ensuring Development Supports Sustainable Travel Part I</p>
	<p>para 5.2.5. One of the bullet points discussed "local housing need". There is no local housing need in Brighouse - the Council's own evidence to the Examination in Public confirmed that. How is this anomaly to be resolved? How will these bullet points stop developers providing 4, 5 6 or even 7 bedroom houses on the site. (Current development of such houses in Clifton would be usable to establish "local need", but it is nothing</p>	<p>Housing need and housing requirement were discussed during the Local Plan Examination.</p> <p>Local Plan Policy HS3 - Housing Mix will ensure that new development meet housing needs as set out in local evidence.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	to do with the housing needs of Calderdale.) This needs to be robustly addressed.	
	Why is there only a preference for Nationally Described Space Standards?? They must be mandatory.	National planning policy enables local planning authorities to introduce the nationally described space standards in Local Plans. The Calderdale Local Plan sets out in paragraph 20.16 that the Council did not have the evidence to support the inclusion of such a policy, and it is also not possible to introduce policy through an SPD.
	Why should developments "strive" to be adaptable and accessible? They must be adaptable and accessible in all cases.	The Masterplan reflects Local Plan Policy HS4 – Housing for Independent Living in that the Council is seeking 100% of new dwellings to be adaptable and accessible, but also recognises there may be site specific considerations where this is not possible.
	para 5.3.2 The proposed location of the local centre will not be within the National standards for walking distances from the dwellings. With such an emphasis on non-car transport, the Council must achieve these standards within the design - otherwise the development will not be "sustainable". Re-thinking the location of the local centre is required.	The Draft Thornhills Garden Community Masterplan SPD sets out in paragraph 3.2.2 that the local centre is location where they can be easily accessed by existing Clifton residents as well as new residents of the Garden Community.
	para 5.3.6. It is not good enough to "envisage" the community facilities to be open by the final phase of development - that could be in 20 years time. The community facilities should be opened on day 1 of the first house being occupied, and the developers should pay for its continued up-keep and running costs until the final phase of development is completed. In that way, the community facilities will be usable and sustainable to all users.	The need for more certainty relating to the delivery of key items of infrastructure is acknowledged. As such, the phasing strategy of the SPD will be amended to ensure further clarity.
	para 5.7.13. What elements of the A641 Corridor Investment Programme are "critical to the delivery of the Garden Communities?? They should be spelled out here, in detail, so	The individual interventions deemed critical are set out in the most recent IDP. The Inspector also noted the specific interventions to deliver the A641 CIP are likely to change, and

Consultee	Comment	Council response and SPD amendment (where applicable)
	that everyone can see them - and they can be properly monitored.	the Plan includes flexibility to be able to respond to potential changes.
	para 5.7.14. The multi-modal traffic model has not been released for any public scrutiny. What evidence is there that it is appropriate or accurate?	The modelling details are set in the Technical Notes contained in the "Evidence Based: transport" page of the Local Plan webpages. These include a Local Model Validation Report
	para 6.2.1. How are the "cumulative effects of the developments" to be considered? There is no provision anywhere that requires this to be done. Instead, each planning application will be considered on its own merits only. The only place to look at the cumulative effects was in the Local Plan process - the Council chose to do this using the defective Strategic Traffic Model, and despite assurances that the Multi-Modal Model would take over this process it did not. The assessment of the cumulative effects of the development should be fully and thoroughly assessed before any development takes place at Thornhills.	<p>The cumulative impact of developments was assessed at a strategic level for the Local Plan as is standard practice. A multi-modal model has been produced and has been made available to developers to assess the impact of their phases of development.</p> <p>As is standard practice each phase will take account of any approved developments at that time.</p>
	para 6.2.12 The Business Case for the A641 Corridor scheme showed it to be of low benefit, and therefore, unlikely to be funded by WYCA before a considerable number of competing schemes across West Yorkshire. More recently, the admission by WYCA that it had no funds to provide even the most cost effective schemes, shows that the A641 works will not be forthcoming for a considerable number of years - if ever. Therefore it is imperative that the "elements critical to the development" should be spelled out in great detail here - then they can be monitored transparently. The legality of Roof Tax funding has not yet been established. Therefore the likelihood of these works going ahead is slim - so, once again, the identification of the "critical" elements must be shown.	The individual interventions deemed critical are set out in the most recent IDP. The Inspector also acknowledged that the specific interventions to deliver the A641 CIP are likely to change, and the Plan includes flexibility to be able to respond to potential changes.

Consultee	Comment	Council response and SPD amendment (where applicable)
	para 6.2.15. The A643 scheme has not been subjected to detailed scrutiny yet - in particular there is no detail of where on-street parking will be displaced to. More detailed consideration of these works is needed before there can be any certainty as to their implementation or efficiency.	Comments relate to matters outside the scope of the SPD.
	para 6.5.3. "Strategic Green Space" is not defined anywhere in the document, so how can there be any assurance that the full amount of green space shown on the Masterplan be provided? Perhaps the wording should be amended to include all the various elements of 'green space' shown on the Masterplan.	Amendments will be made to this paragraph to improve clarity.
717690 Mr Jason Carlton	THMP22 & THDC21 General comments The timing of this Consultation (although consistent for Calderdale) disadvantages genuine public participation. Why didn't you hold any public engagement sessions before launching this consultation? The level of detail published in over 400 pages is impossible to digest in the limited time given Why haven't you engaged with local residents before this point? You have involved local landowners! What is the rush to hold this consultation when other SPD documents have not been made available at the same time? Considering countless errors, the documents would have benefitted from a professional proof-reader before their release	The Town and Country Planning (Local Planning) (England) Regulations 2012 require a Local Planning Authority to undertake public consultation on draft SPDs for a minimum of four weeks, and to take account of any comments received in preparing the final documents. Cabinet considered the draft SPD at its meeting of 7th August 2023 and authorised a four-week public consultation in compliance with regulations. Many comments were received from various stakeholders on the allocation of the site in the Local Plan. The issues raised during the Local Plan preparation informed the resulting Site Specific Considerations in Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road, Brighouse , many of which were recommended as Main Modifications by the Inspector, and it is these on which the SPD has built.

Consultee	Comment	Council response and SPD amendment (where applicable)
		This SPD consultation is an opportunity for all stakeholders to make comment on the draft documents and help shape the final Masterplans and Design Codes.
	<p>Missing documents:</p> <p>Why was this consultation released without the other supporting SPDs?</p> <p>Where is the updated Infrastructure Delivery Plan? Last published version March 2021 - really????</p> <p>Roof Tax SPD - where is the detail about what Brighouse other developments will be funding?</p>	<p>Supplementary Planning Documents provide guidance on the implementation of Local Plan policies. They do not introduce new policy requirements. It is not feasible or considered necessary to prepare all other SPDs prior to the Garden Community Masterplan SPDs. Local Plan policies will apply to all planning applications determined prior to adoption of the other SPDs.</p> <p>The most recent IDP was presented to the Inspector during the Examination and will be updated again in due course.</p> <p>A Roof Tax SPD is not being prepared. Details on contributions that may be made from other developments are beyond the scope of this consultation.</p>
	<p>Thornhills Spine Road (BG10) - what is the justification for dropping this?</p> <p>What's changed since your evidence to the Planning Inspector that BG10 was essential to deliver Thornhills?</p>	<p>The IDP is a "live" document and the schemes listed are subject to change dependent on factors such as viability, funding, or whether revised evidence shows a scheme is or is not required. The Inspector commented at some length in her Final Report on the A641 and acknowledged that many of the transport schemes are in the process of developing business cases.</p> <p>Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road, Brighouse is accordingly flexible in this regard:</p> <p><i>Unless demonstrated otherwise through an up-to-date Transport Assessment, no more than 680 units shall be delivered in advance of the completion of the critical schemes</i></p>

Consultee	Comment	Council response and SPD amendment (where applicable)
		<i>listed in the IDP (2021). The IDP is a provisional list and is subject to change as masterplanning work progresses and the A641 business case is developed.</i>
	Garden community principles Nonsense - this is an unsustainable mass-housing plan intensified in one part of the allocation that will encourage car dependency.	The Masterplan document sets that the location of development has been constrained by factors including topography, proximity to heritage assets and large areas of ecological significance. Refer to Para 4.4.6 of the Draft Thornhills Garden Community Masterplan SPD . The Masterplan aims to deliver a clear movement hierarchy which prioritises active travel, with opportunities for walking and cycling provided through an extensive network of footpaths and cycleways.
	Open Space I remain unhappy at your dilution of the Open Space policy -	Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road, Brighouse of the Local Plan is clear that open space provision on the garden community will be above the requirements set out in the Local Plan. Also refer to Paragraph 6.2.20 of the Draft Thornhills Garden Community Masterplan SPD .
	What's missing from the proposals? Secondary school provision - and funding	Significant changes in preferencing patterns have occurred which has resulted in far fewer extra district pupils seeking provision within Calderdale. This has released capacity in the Lightcliffe area. Developments in neighbouring Kirklees have also been delayed. Additional capacity will only be provided if required and will be based upon need (not demand) at the time that developments are in the delivery stage
	On-site healthcare (despite being promised in the EIP)	Joint working with the Clinical Commissioning Group (CCG) around the delivery of primary care health and wellbeing facilities has continued throughout the development of the Local Plan, including liaison with the Lower Valley Primary Care Network of GPs in Southeast Calderdale and the NHS Estates Delivery Unit.

Consultee	Comment	Council response and SPD amendment (where applicable)
		Discussion with the NHS Estates Delivery Unit confirmed that there would be no appetite for the provision of on-site health and wellbeing hubs that could accommodate surgeries, pharmacies and other associated facilities. Increased demand will instead be accommodated through the enlargement of existing facilities in the local area.
	A641 Spine Road (BG10)	See response above.
	Any serious indication of how it will be funded	Refer to Section 6.3 of the Draft Thornhills Garden Community Masterplan SPD document
	<p>Stewardship - an admission the strategic site viability assessment was flawed?</p> <p>How can you first introduce this concept into the SPD?</p> <p>Why wasn't this disclosed in any of the earlier local plan documents?</p> <p>Why didn't you include this in evidence to the Planning Inspector?</p> <p>Why was it excluded from the Viability Assessment?</p> <p>Finally - you haven't actually answered or responded to any of my previous comments over the last four years; you'll undoubtedly ignore these, to</p>	The approach is set out in Local Plan Policy IM7 – Masterplanning Part VII.
1341155 Sam Booth	<p>THMP23 & THDC22</p> <p>Docs - THMP23_THDC22_Sam Booth_DOCUMENT2.pdf</p> <p>Calderdale Council Consultation Thornhills Garden Community Design Code SPD - 22nd September 2023</p> <p>Thornhills Garden Community Masterplan SPD</p>	

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>Thank you for providing the opportunity to comment on the Thornhills Garden Community Design Code and Masterplan SPD being proposed by Calderdale Council.</p> <p>Although the Town and Country Planning (Local Planning) Regulation 12 stipulates that a minimum of 4 weeks is required for consultation. A significant proportion of Local Authorities provide at least 6 weeks for consultation to ensure that stakeholders are afforded a fair and reasonable opportunity to read, prepare and submit comments. Given Calderdale Councils' decision to start the consultation process during the summer holidays. It feels unjust and detrimental to the consultation process that only 4 weeks has been provided. Especially given the large volume of literature that is to be reviewed prior to submitting a response.</p>	<p>The Town and Country Planning (Local Planning) (England) Regulations 2012 require a Local Planning Authority to undertake public consultation on draft SPDs for a minimum of four weeks, and to take account of any comments received in preparing the final documents.</p> <p>Cabinet considered the draft SPD at its meeting of 7th August 2023 and authorised a four-week public consultation in compliance with regulations.</p>
	<p>To the matter of the documents themselves, within Calderdale's adopted Local plan policy, IM7 states:</p> <p>"The preparation of masterplans for strategic housing sites should involve relevant stakeholders, including the Council, infrastructure providers, landowners, developers, the local community, service providers and other interested parties. Masterplans should cover the whole of the allocation and be developed in consultation with and endorsed where appropriate by the Council prior to the approval of a planning application for any part of the site."</p> <p>A freedom of information (FOI) request provided by the Council (attached) [click here to view], demonstrates that they have clearly failed to follow their own policy, as such this calls into question the legality of their Planning process. This is the insert taken from the stage 2 design brief that Calderdale Council shared with JTP:</p>	<p>The Masterplan has clearly been promoted as SPD informed by public consultation and it is wholly inaccurate to suggest that it "only benefits the developer and the Council" (the Council has no commercial land interest in the development so there can be no suggestion of 'institutional bias' here.) Deliverability is a key facet of the Garden Community proposals, and it is entirely appropriate that the Council has been engaging with developers who are likely to be responsible for delivering the early phases (subject of course to securing planning permission).</p> <p>The Council and masterplanning team have engaged with the developers in contract to deliver the phase one schemes in order to provide scheme feedback as part of the established pre-application advice procedures.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>“The overall aspirations for this stage of works were: -</p> <ul style="list-style-type: none"> • Meet with Bellway and Redrow who have option agreements on early phase parcels to understand their commercial objectives and Calderdale Council Consultation Thornhills Garden Community Design Code SPD22nd September 2023 Thornhills Garden Community Masterplan SPD intentions for early planning applications, enabling where possible, early planning applications to be made” <p>Bellway and Redrow represent only a portion of the landowners across both Garden Suburbs, however this appears to be the only stakeholder who has had any involvement in the design of the Masterplan.</p> <p>There appears to be a disparity between the ethos that JTP presents on its website with statements such as:</p> <p>“Our unique community planning process puts local people at the heart of the design process,”</p> <p>“putting people at the heart of the creative process, unearthing the real needs of a community, empowering stakeholders, creating goodwill, inspiring community spirit and building consensus. Far from imposing ready-made off the shelf solutions, we build a Vision together. This leads to places that are vibrant, valued and sustainable from the outset.” compared with the process that has actually taken place. As none of this appears to have occurred, however based on the FOI, the onus for this lies with the Council, as they appear to have been keener to seek the input of a developer over the wider community or all stakeholders. Therefore, please can the Council confirm at what point it will be engaging with Local communities in a meaningful way, so that their thoughts and ideas on the design of the</p>	

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>Garden Suburb can be captured and embedded within the masterplan before it is then taken to a further consultation.</p> <p>What is more disappointing, is when you compare JTP's Masterplan with that which was submitted by Bellway's (a developer with "early phase parcels") in 2020, they are practically identical. This then calls into question the true independence of this review.</p> <p>(https://new.calderdale.gov.uk/sites/default/files/2023-06/LP1643-776A-15D-Development-Framework-Plan.pdf)</p> <p>JTP Masterplan (2023)</p> <p>From what information has been presented, and aside from the fact that Calderdale Council appear to have grossly mismanaged the public purse with unnecessary consultation fees, if their intention was only to appease one developer. The Council are currently proposing a large-scale housing development to the east of the site, not a Garden Suburb. This proposal only benefits the developer and the Council. Not the local people or future residents. Nor does it justify the site being removed from greenbelt.</p>	
	<p>Site Boundary</p> <p>One of the Main Modifications stipulated by the Inspector, and a modification that the Council agreed to in order to make the Local Plan sound was MM254.</p> <p>This stated:</p> <p>"Amend site boundary and area to include northern spine road access point"</p> <p>For some reason in the masterplan provided by JTP, the correct site boundary has not been used. Therefore, please can</p>	<p>The site boundary reflects the allocated site in the Local Plan. The inspector recommended a Main Modification to Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road, Brighouse which reads: <i>Delivery of the Garden Suburb is feasible through provision of a spine road, however the final layout and access options will be refined through the masterplanning work.</i> The wording quoted by the consultee was drafted during Stage 2 of the Local Plan Examination Hearings but was amended following later discussions, with the</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>Calderdale Council provide a written statement with the justification for their deviation from the Local Plan Site Boundary of LP1463. This is of particular importance given the extensive discussions that were held as part of the Local Plan Stage Hearing, with subsequent evidence provided that the spine road was necessary for the total quota of housing to be developed on this site. The spine road, that would enter through the north of the site was deemed crucial by the Council in the Local Plan as it would ensure the full development could be brought forward with an even dispersal of traffic generated from the new suburb.</p> <p>As it currently stands this proposal will have all traffic exiting onto Clifton Common, this proposal is unsafe and will prove harmful to existing and future residents. Especially given the modelling work completed by WSP during the Local Plan which stated that Clifton Common (A643) could not safely handle the total housing allocation for the Thornhills Garden Suburb on its own. This was fundamental to the Inspectors decision to require a main modification that moved the Garden Suburb development back at least 2 years in the Councils Housing projections to ensure the development of key infrastructure (Spine Road) prior to housing development. Therefore please could the Council provide their rational for removing the spine road from the Thornhill Garden Suburb.</p>	<p>amended wording set out in the schedule of Main Modifications accompanying the Inspector's Final Report (MM211).</p>
	<p>Historic England</p> <p>Historic England required that the Thornhill Garden Suburb Site should facilitate the repair of the Grade 2 listed Woolrow. This was also captured by the Inspector as part of main modification MM211. What is concerning now, is that within the JTP document it is being suggested that it is no longer a requirement of the whole scheme, but instead:</p>	<p>As set out in the SPD, the Roof Tax is intended to ensure that the costs of site-wide infrastructure are shared equitably across the Garden Community (see table at paragraph 6.3.2). Other localised infrastructure and planning requirements associated with individual planning applications will be delivered using tailored planning conditions and planning obligations.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>“only Residential parcels to the north of Jay House Lane are to contribute to the repair of the Woolrow”.</p> <p>This would raise concerns as to the fragmented approach the Council appear to be taking to what should be treated as one site. Moreover, there does not appear to have been any form of viability study produced by Calderdale Council that outlines the repair works required to the Woolrow or the associated costs for this. These costings should then be factored into the wider viability study for the whole site and then used to calculate a fair and equitable roof tax for all dwellings within the Thornhills Garden Suburb Scheme. This approach is fundamental to ensure that the benefit of the scheme is realised in its entirety.</p> <p>Furthermore, this undermines IM7 and the requirement of equalisation, as incoherently placing varying costs across different parcels of development land is counterintuitive to a whole scheme that is signed up to equalisation. IM7 also stipulates that the process must be transparent, based on what information has been provided by the Council to date, sadly this appears to be another area that they have failed to adhere to. The SPD is supposed to provide a clear mechanism in which the Council intend bring forward the scheme. Based on the above, there doesn't appear to be a coherent plan.</p>	<p>The repair of the Woolrow is not considered to be site wide infrastructure on which the delivery of the Garden Community as a whole depends.</p>
	<p>Garden City Principles</p> <p>The TCPA state:</p> <p>“A Garden City is a holistically planned new settlement which enhances the natural environment and offers high-quality affordable housing and locally accessible work in beautiful, healthy and sociable communities.”</p> <p>https://www.tcpa.org.uk/garden-city-principles/</p>	<p>The indicative developable area used to calculate the density in the Local Plan was based on constraints such as heritage and ecology. It did not take account of the land required for non-residential uses, such as education, the local centre and open space.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>They also advocate that 50% of a garden community's surface area should be allocated to green infrastructure. The underpinning philosophy behind this is to ensure that green space is weaved throughout the whole development, providing nature on ones doorstep. This is fundamental to differentiating a typical housing estate with a garden suburb. What is extremely disappointing with the plan presented by Calderdale Council, is that none of the Garden City Principles appear to have been instilled within a master plan, instead they seem to have listened only to the preference of their early stage developer Bellway's, and conceded to building a densely populated housing estate to the east of the site. Moreover the dwelling per hectare (dph) within this masterplan which ranges from 30 – 40+ dwelling per hectare , is completely at odds with the Councils local plan that states a dph of 19.</p> <p>The justification used for this is that the topography of the land to the north isn't suitable for development. However it has been deemed suitable for classification as "amenity green space". There a 2 major issues with this. Firstly, the definition of amenity green space is:</p> <p>"relatively small parcels of green space with few, if any, ancillary facilities that are closely related to homes and have benefits for local residents, whether for play or general amenity"</p> <p>This isn't a small parcel of green land being proposed but a significant proportion of the garden suburb site. Nor is it closely related to any of the homes being proposed for development. Therefore it fails to meet any of the requirements of amenity green space. Secondly, and perhaps more importantly, the Council chose to omit the northern land from development due to topography, and yet they are happy for it to be allocated as an area for children to play? Does this not seem contradictory.</p>	<p>The definition of amenity green space in the Glossary of the Local Plan is as follows: <i>'Open land, often landscaped, that makes a positive contribution to the appearance of an area or improves the quality of the lives of people living or working in the locality. It often provides opportunities for activities such as sports, and can serve other purposes such as reducing the noise from a busy road or providing shelter from prevailing winds'.</i></p> <p>It is also set out in Paragraph 4.4.6 of the Draft Thornhills Garden Community Masterplan SPD that topography has not been the only constraint to development in the northern part of the site. Proximity to heritage assets and areas of ecological significance has also impacted on the suitability of this part of the site for development.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>A simple analysis of the site using OS maps clearly shows that the topography of the land to the north of the garden suburb, is exactly the same of that to the South East which currently has allocated a dph of 35 – 40+.</p> <p>Subsequently, this shows that the Local Authority could and should be distributing the housing allocation across the whole of the Garden Suburb, not only will this be in keeping with Local Plan policy of 19 dwellings per hectare for the site. But it will also meet the requirements of Garden City Principles, with green space being evenly distributed throughout the whole site. Please can the Council provide the Site Analysis work that has been completed to determine the topography of the whole site and how this has fed into the design of this proposed masterplan.</p>	
	<p>Overall, the SPD's currently being consulted on are not fit for purpose. They do not provide a clear mechanism for which the council intend to bring forward a genuine garden suburb nor have they been developed alongside local communities, all land owners or stakeholders. In addition, they fail to meet the Policies that the Council have adopted as part of its own Local Plan.</p> <p>Subsequently, it would be beneficial for the Council to review their own Local Plan policies in the first instance, and then engage fully with all stakeholders in the Garden Suburbs so that the design of the masterplans can be truly collaborative.</p>	<p>The SPD provides further guidance on the implementation of the Local Plan policies and will be a material consideration in the determination of planning applications on the site. The SPD is the mechanism to ensure that planning applications for separate phases are developed to ensure high quality, comprehensive development of the site.</p>
<p>1341660</p> <p>Nick Willock</p> <p>Robert Halstead Chartered Surveyors</p>	<p>THMP24</p> <p>Dear Sir / Madam,</p> <p>We represent Wharfedale Ltd, who as you will be aware from previous discussions, own land north of Jay House Lane and land situated between the A641 Bradford Road and the allocated site.</p>	

Consultee	Comment	Council response and SPD amendment (where applicable)
& Town Planners	<p>With regard to the Masterplan SPD we have the following comments.</p> <p>There is no mention of the required link road between the A641 and A643. We note the following:</p> <p>Paragraph 6.2.12 states: <i>“In terms of transport, the key facilitator that is required to support the spatial emphasis on southeast Calderdale is the A641 Corridor Investment Programme (CIP). Calderdale, Kirklees and Bradford councils are working with the West Yorkshire Combined Authority to improve the A641 between Bradford, Brighouse and Huddersfield. The CIP includes various projects that are considered critical to the delivery of the Garden Communities.”</i></p> <p>Calderdale Local Plan Appendix 1 Site Number LP1463 states: “Unless demonstrated otherwise through an up-to-date Transport Assessment, no more than 680 units shall be delivered in advance of the completion of the critical schemes listed in the IDP (2021).”</p> <p>The IDP (2021) lists the A641 / A643 spine road as one of the key A641 infrastructure projects at £12 million.</p> <p>At the Local Plan Hearings, Mr Richard Seaman said to the Inspector that up to 680 dwellings could be supported before "critical" interventions are required on the highway network, and confirmed that proposed A641 to A643 link road (part of the A641 corridor investment programme) would need to be in place at the point to enable more than 680 dwellings to be supported on the garden suburb site.</p> <p>Notwithstanding the above, the Table at page 48 of the masterplan SPD states that the delivery/phasing of the A641 infrastructure works is not earmarked for any particular phase of</p>	<p>The Infrastructure Delivery Plan is a live document, documenting the infrastructure schemes considered necessary to delivering Local Plan growth. The most recent IDP was presented to the Inspector during the Examination and will be updated again in due course.</p> <p>The Inspector acknowledged in her report on the Local Plan that the details of the A641 scheme are evolving, and that investigations to provide an alternative option to the Thornhills Spine Road were being undertaken, as well as recognising that the business case is being developed, and Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road, Brighouse is accordingly flexible in this regard.</p> <p>The A641 programme is progressing through the business case, and at this stage it is not possible to set out timescales for delivery of specific interventions. The Inspector acknowledged in her report on the Local Plan that the details of the A641 scheme are evolving and Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road, Brighouse is accordingly flexible in this regard.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>the development? We question how this can be, given that it has been publicly stated and confirmed within the Local Plan documentation and evidence base that only one third of the development (680 units) can be supported without these infrastructure works being delivered?</p> <p>Our key question is therefore why there is no mention or inclusion of the link road in either of the SPD's, or in any of the masterplan drawings within these documents ?</p> <p>If further transport assessment work is to be carried out, then stakeholders must be consulted and given the opportunity to provide comments on this.</p>	
	<p>Finally, section 6.3 of the masterplan SPD details all the developer funded infrastructure/section 106 contributions. My clients are gravely concerned there does not appear to have been any detailed viability work to provide evidence that all these matters can actually be funded by developers, whilst also allowing development to be viable. Obviously, the concern is that none of this development is going to get off the ground should the expected developer contributions amount to unaffordable levels. Our provisional view is that expectations in this regard are too high and that inevitably, the development of the garden suburb will require significant external funding subsidies.</p>	<p>Throughout the masterplanning process, the Council has commissioned an Infrastructure Delivery Cost Plan and numerous viability assessments. This work attributes costs to the infrastructure necessary for development schemes within the Garden Communities to be funded by future house builder schemes in so far as it is viable to do so. The work also identifies project costs that are of wider benefit which cannot be attributed to a phase schemes.</p> <p>Costs that cannot be allocated to phase plots need to be funded and delivered by the Council. These Council-delivered works are proposed to be funded through prudential borrowing which is capable of recovery via a roof tariff mechanism levied on each new home.</p> <p>The Council's valuation specialist advisors have presented their viability assessment report findings based on proposed tariff rates derived from the capital cost estimates attributed to the critical schemes. These findings confirm that the Garden Communities are viable based on these input assumptions.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
<p>11325</p> <p>Graham Stanley</p>	<p>THMP25</p> <p>Re: Consultation – Supplementary Planning Documents (SPDs) – Thornhills Garden Community.</p> <p>Comments from Mr and Mrs Graham E. and Janet L. Stanley residents of Clifton, Brighouse.</p> <p>We strongly object to this Consultation Process taking place during the Summer, with only a period of a few weeks to read and understand 440 pages in 4 documents and make our response. We note that the documents are dated 19th June 2023 and were received on the 25th August 2023.</p> <p>We also strongly object because various supporting documents are apparently not yet available as they have not been published. i.e., Roof Tax and Viability Information.</p> <p>We also object as this is the first opportunity to comment on the SPDs, which means that our views are asked for very late in the process.</p>	<p>The Town and Country Planning (Local Planning) (England) Regulations 2012 require a Local Planning Authority to undertake public consultation on draft SPDs for a minimum of four weeks, and to take account of any comments received in preparing the final documents.</p> <p>Cabinet considered the draft SPD at its meeting of 7th August 2023 and authorised a four-week public consultation in compliance with regulations.</p> <p>Many comments were received from various stakeholders on the allocation of the site in the Local Plan. The issues raised during the Local Plan preparation informed the resulting SSCs in Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road, Brighouse, many of which were recommended as Main Modifications by the Inspector, and it is these on which the SPD has built.</p> <p>This SPD consultation is an opportunity for all stakeholders to make comment on the draft documents and help shape the final Masterplans and Design Codes.</p>
	<p>Paragraph (para) 1.1.7 (Page 5) states that the Garden Community will be delivered over a long period of time. On page 45 it states 15 to 20 years. Planners MUST be able to be more specific.</p>	<p>The timing of the development of the site, and the delivery of individual phases are affected by a number of factors. paragraph 6.1.5 of the Draft Thornhills Garden Community Masterplan SPD.</p>
	<p>Para 1.2.4 (Page 7) states that ‘in-depth’ topic workshops have taken place. We object to not being invited/included in these</p>	<p>The consultation on the SPD meets the requirements of Policy IM7 – Masterplanning. This SPD consultation is an opportunity</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	workshops. Nor have representatives of Clifton Village Community Association been invited. We also object that this is the first time we have been invited to comment upon the SPD. We note that the Calderdale Policy IM7 is referred to in the introduction and we are aware that the IM7 should involve public consultation. This has not happened.	for all stakeholders to make comment on the draft documents and help shape the final Masterplans and Design Codes.
	<p>Para 1.3.1 (Page 8) states that the SPD has been prepared against 'a wider backdrop of evolving policy imperatives'. We object because firm plans cannot be produced from evolving policies.</p> <p>Page 8. The document refers to Calderdale Council declaring a Climate Emergency.</p> <p>The plans do not respond to this 'Climate Emergency' because Calderdale Council is planning to build over 1900 houses on a biodiverse area of green belt referred to by the Public Inspector as 'high end' green belt.</p>	<p>Explained in paragraph 1.3.8 of the Draft Thornhills Garden Community Masterplan SPD</p> <p>The Local Plan Inspector agreed that the allocation of the site was consistent with the overall spatial strategy for the Local Plan.</p>
	Para 1.3.11 (Page 9). It is stated in the NPPF para 73 quotation that larger scale developments can be best achieved when supported by necessary infrastructure. We object to the plan because there is no planned infrastructure on the main roads surrounding the area planned for the Garden Community. The already busy and frequently totally blocked roads (Clifton Common, Highmoor Lane, Walton Lane and the roads of Clifton and Thornhills), which are partially due to the proximity of the M62, clearly show that the infrastructure required is not in place to accommodate the current level of traffic.	<p>This comment is regarding the principle of development in this location and was discussed at length at the Local Plan Hearings. As above, the Local Plan Inspector agreed that the allocation of the site was consistent with the overall spatial strategy for the Local Plan.</p> <p>The masterplan document contains a chapter detailing the delivery strategies for key items of infrastructure required to facilitate development on the allocation. Crucially, the documents contain specific information regarding the funding strategies for that infrastructure and the expected developer contributions.</p>
	Para 3.1.3 (Page 17). This refers to site constraints.	There are multiple comments on opportunities and constraints listed in Section 3 and on Development Guidelines in Section 5

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>It is our firm view that: existing waterways MUST be sensitively incorporated.</p> <p>The parts of the site which will be visible in long range views from Brighouse MUST not be included, because they will be blots on the landscape.</p> <p>There are so many areas of unstable land that the development is unviable. We, therefore, strongly object to any building in these areas.</p> <p>All public Rights of Way MUST be accommodated within any development proposals.</p> <p>The area includes mines of great historical interest and MUST be retained.</p>	<p>of the Draft Thornhills Garden Community Masterplan SPD, which state that certain features, attributes etc <i>must</i> retained, incorporated etc. Throughout development of the masterplan and design code documents, careful consideration has been given to the choice of wording and the implications this may have. The Calderdale Local Plan is ultimately the policy framework upon which these documents are based, any planning application will therefore need to be in conformity with these policies - it cannot go further or introduce policy. A delicate balance must be achieved in providing supplementary guidance and avoiding producing a rigid set of parameters that results in an unusable document and could in turn stymie delivery of the Garden Community.</p>
	<p>Thornhills Hamlet and numerous buildings of historical significance exist along the boundaries of the proposed Garden Community. The new development will neither complement nor enhance this local heritage and will destroy the local character of this distinctive historical environment. We, therefore, strongly object to the building of the new development. Thornhills local heritage MUST be retained.</p>	<p>Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road, Brighouse of the Local Plan requires the 'masterplanning' to ensure designs safeguard the character and identity of the Thornhills hamlet and the wooded valley slopes. Paragraph 7.2.7 of the Design Guide states that 'Development will need to sensitively respond to the character of the existing settlement and lane with a more rural, village character along these edges which is likely to be achieved through a combination of landscape screening, reduced density of development and careful selection of housing typologies and layouts'. In addition, please see requirement for a Landscape and Visual Impact Assessment to be submitted with each phased planning application.</p> <p>The Local Plan also contains various policies that will reinforce the requirement of Appendix 1 – Site Number LP1463 – Land</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
		<p>between Highmoor Lane and Bradford Road, Brighouse, specifically Policy BT1 – High Quality Inclusive Design which ensures schemes respect and enhance the character and appearance of existing buildings and surroundings.</p> <p>Further, while the northern part of the allocation is heavily constrained by factors including topography, proximity to heritage assets and ecological significance, it also ensures that attractive landscape features are maintained and serves to safeguard the character and identity of the Thornhills Hamlet and wooded valley slopes. Please also refer to paragraph 5.5.13 in the Draft Thornhills Garden Community Masterplan SPD for additional detail.</p>
	<p>Page 18 – map. The wildlife habitat network appears to be illogical on both sides of Thornhills Lane, Thornhills Beck Lane and Jay House Lane. The whole area has a massive biodiversity and we object to the destruction of this land and green belt.</p>	<p>The Wildlife Habitat Network shown on the map is as it is designated in the Local Plan.</p>
	<p>Para 3.2.2 (Page 19). For any developments, existing woodland, trees and hedgerows MUST be retained and enhanced as much as possible.</p> <p>Historical stone walls and field boundaries MUST be retained.</p> <p>Existing Thornhills Lane, Thornhills Beck Lane and Jay House Lane MUST be traffic calmed with 10 mph speed limit to ensure safe access for Thornhills Hamlet owners and their vehicles and local walkers. Thornhills Hamlet is on the Calderdale Way.</p> <p>Thornhills Lane is already a rat run with cars speeding to cut through when Clifton Common is gridlocked as it frequently is.</p>	<p>See response above</p>
	<p>Attractive, ecologically rich, buffer planting to existing dwellings in Thornhills Hamlet MUST be provided. As stated in the report</p>	<p>See response above regarding safeguarding the character and identity of Thornhills Hamlet.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	by the Public Inspector after the enquiry, Thornhills Hamlet MUST have a buffer . We wish to know why there is no reference to this buffer in the plans or on the appropriate map.	
	Para 4.2 (Page 23). The entrance to the proposed Primary School is unacceptable. This is a narrow residential road from Clifton Common and is further narrowed by residential car parking.	Vehicular access to the school from Thornhills Lane will be specifically for deliveries and staff members.
	<p>Para 4.4.2 (Page 25). If 'Summit Park' is located at the centre of the site 'offering potential views across the valley', the planned newly built homes and the current tree line will obscure the view.</p> <p>Para 4.5.1 (Page 26). Active transport, for example cycling and walking, across all ages and abilities is not viable. Clifton and Thornhills are at the top of a very steep hill.</p> <p>How will walking and cycling be encouraged?</p> <p>How will potential house buyers be discouraged from owning cars to ensure no increase in vehicles on already congested roads?</p>	Walking and cycling will be encouraged by providing opportunities for walking and cycling, by providing an attractive environment that prioritises active travel modes.
	<p>Para 5.1.4 (Page 27). All new development within the Garden Community MUST demonstrate that it will not result in any significant adverse impact on the living conditions of the existing Thornhills residents.</p> <p>Para 5.2.2 (Page 28). 'Garden Communities are less appropriate for flats' – any flats built MUST be no higher than the houses.</p> <p>Para 5.2.3 (Page 28). 'Calderdale has an ageing population'. Accommodation MUST be relevant to their needs and demand for bungalows must be met.</p>	See response above

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>Para 5.5 (Page 33). Green infrastructure. This MUST be included as listed in 5.1.1 and 5.1.2.</p> <p>Para 5.6.2 (Page 35). The drainage layout of the site MUST be adequate. A management and maintenance plan for efficient drainage for the lifetime of the development MUST be provided.</p> <p>Para 5.7.12 (Page 37). The current highway infrastructure around Thornhills and Clifton is totally inadequate and will not be viable to serve the Thornhills Garden Community.</p> <p>Para 5.8 (Page 38). Heritage. All heritage assets MUST be retained.</p> <p>Para 5.9 (Page 39). Climate change. Flood risk is a major issue in the area and every action MUST be taken before the development commences.</p> <p>Para 6.1.4 (Page 45). It is stated that it will take approximately 15 to 20 years to build out the residential elements of the scheme. That is 15 to 20 years of disruption to the residents of Thornhills and Clifton. Development traffic and machinery MUST not pass through the Thornhills Hamlet. Thornhills Lane MUST not be used for site traffic.</p> <p>Para 6.2.7 (Page 46). With reference to para 7.1.3 the building of the Thornhills Garden Community with the park and a new Primary School will not develop one village environment. It will create a split village – a Clifton of two halves. Two schools, two parks and two Community Centres. This will destroy the cohesive village community.</p> <p>Para 6.2.9 (Page 46). Increased demand for health facilities cannot be met by the existing provision; they are oversubscribed now. A new facility MUST be provided on site.</p>	

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>In conclusion it is our firm view that the Thornhills Garden Community is a 'vision', is unsustainable, undeliverable and will result in unjustified and the needless permanent removal of 'high end' green belt land. Linked with the present traffic problems and congestion and lack of infrastructure the proposed Garden Community is unviable.</p>	
<p>1341717 ID Planning – Rachel Flounders</p>	<p>THMP27</p> <p>Please find attached representations to the Draft Thornhills Garden Community Masterplan and Design Code SPDs.</p> <p>The attached representations are submitted on behalf of the following landowners and developers:-</p> <p>Bretton Family Hartley Family Mike Oller Mrs Caine Harron Homes Bellway Homes Ltd (Yorkshire)</p> <p>The landowners and developers are supportive of the SPDs being prepared in relation to the Thornhills Garden Community site. The attached representations provide comments which will assist in ensuring the housing and associated infrastructure can be viably delivered.</p> <p>1. Introduction</p> <p>1.1 These representations are made on behalf of the following parties who have land interests within the Thornhills Garden</p>	<p>Noted.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>Suburb: - • Bretton Family • Hartley Family • Mike Oller • Mrs Caine • Harron Homes • Bellway Homes Ltd (Yorkshire)</p> <p>1.2 The Masterplan SPD for the Thornhills Garden Community seeks to provide guidance and articulate the requirements of adopted Policy IM7 (Masterplanning) and seeks to set out the Council's expectations for the development of a high quality, comprehensive development.</p> <p>1.3 The landowners and developers are supportive of the Masterplan SPD being prepared in relation to the Thornhills Garden Community site and wish to work with the Council to ensure the housing and associated infrastructure can be viably delivered.</p> <p>1.4 This representation statement provides comment on the consultation document based on the landowners and developers wide ranging experience of delivering housing developments.</p>	
	<p>2 2.Representations to the Thornhills Garden Community SPD Consultation</p> <p>2.1 This section of the representation statement firstly highlights the key areas of concerns following our review of the Draft Masterplan document. The second part of our representation provides more detailed comments in relation to specific paragraphs.</p> <p>Key Areas of Concern 1. Housing Mix and Density</p> <p>2.2 The Draft SPD identifies the housing mix for the whole of the Garden Community site (paragraphs 5.2.1 – 5.2.5) with 10-15% of the dwellings to be 1 bedroom, 60-80% of dwellings to be 2 and 3 bedroom dwellings and 10-15% to be 4 bedroom dwellings. It is considered that this approach is too prescriptive.</p>	<p>Policy HS3 – Housing Mix of the Calderdale Local Plan states that housing mix should be informed by the most recent SHMA together with other relevant and recent information, and also taking into account market factors, and the location and characteristics of the site. While the Draft SPD documents establish a broad mix of homes that will be required on the allocation, it mirrors the Local Plan in acknowledging other factors will be taken into account, including reference to market factors, location and site characteristics.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>To be responsive to market demands and changing market circumstances, the SPD should provide some flexibility to allow an alternative mix. Since the COVID pandemic there have been changes to people's space requirements with many people now working from home part or full time. This is driving demand for larger properties to provide homeworking space in addition to bedroom space.</p> <p>2.3 At paragraph 5.2.1 it is stated that 'the 2018 SHMA suggests that need is highest for two and three bedroom homes'. This should be amended to read 'the 2018 SHMA suggests that need was highest for two and three bedroom homes' (underlining shows the text to be changed). The SPD needs to acknowledge that the SHMA is already 5 years out of date and there have been significant changes in how people use their homes since the SHMA was prepared.</p> <p>2.4 The SPD should support a broad range of housing with reference to up to date evidence of housing need. The blanket approach being taken to housing mix across the site does not lend itself to creation of true character areas. The creation of character areas currently only seems to be driven by the use of differing materials and road patterns and not in relation to housing mix. Supporting a broad mix of housing across the site and the character areas will ensure a mixed and balanced community is created in accordance with the NPPF.</p>	
	<p>2.5 The minimum density figure and density ranges are too prescriptive. Paragraphs 4.34 and 4.35 set out a minimum requirement for 30 dwellings per hectare, with a higher density being strongly encouraged. The delivery plan in Section 6 of the SPD shows the minimum density for individual phases as being</p>	<p>Paragraph 5.2.1 makes it clear that a broad range of homes of different types and sizes is required. This is highlighted in the Principles of Development on the same page. It also notes that a need for 3 bed homes is confirmed in studies subsequent to the 2018 SHMA.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>32.5 dwellings per hectare with a number of phases where the density is shown as 37.5 dwellings per hectare.</p> <p>2.6 Detailed work that has been undertaken to date has shown that achieving the minimum density across the whole site is unlikely to be achievable on all phases, but it is also the case that some areas have potential for delivering higher densities than have been stated, subject to design considerations. The density ranges are therefore too prescriptive in both directions.</p>	<p>However, the Council is due to undertake a “refresh” of parts of the SHMA that will amongst other things look at size of homes needed across the Borough in 2023. Furthermore, it is expected further studies will take place in the lifetime of the development and can be used to inform individual planning applications.</p>
	<p>2.7 The SPD should therefore be worded to support a more flexible approach in relation to density which takes into account varying site constraints across the site and different character areas. The SPD should also account for changes in the need for different house sizes that are likely to occur over the lifetime of the development of the site.</p>	<p>The referenced paragraphs establish the approach to density and a justification as to which parts of the site may be more appropriate for higher or lower densities. Policy HS2 – Residential Density of the Local Plan does however establish the policy basis for residential density and outlines the circumstances in which lower densities may be appropriate.</p>
	<p>2 Affordable Housing</p> <p>2.8 The section on affordable housing (5.2.6 – 5.2.10) does not make any reference to First Homes, which should form part of the mix of affordable housing.</p> <p>2.9 The Draft SPD also suggests the predominant need is for two and three bedroom affordable dwellings with some four beds. The SPD should provide some flexibility given the need for different types and size of affordable dwelling could change over the lifetime of the development. The development principles section should be amended to refer to up to date local evidence being taken into account when determining the mix of affordable housing.</p>	<p>The Local Plan was submitted for examination prior to the introduction of First Homes and so does not refer to them. Legal advice is that, since SPDs may not introduce new policies, they cannot include reference to First Homes.</p> <p>The requirement for affordable housing in paragraph 5.2.7 is based on analysis of need for affordable Housing from the Choice Based Lettings System. Further analysis of affordable housing types will be made in the SHMA Refresh referred to above. Advice on individual planning applications will also be provided based on analysis of the Choice-Based Letting System at the time of application.</p>
	<p>3. Biodiversity Net Gain</p> <p>2.10 Paragraphs 5.5.8 to 5.5.12 set out the requirements for delivering Biodiversity Net Gain and states that for phased</p>	<p>On 9th October 2023 Cabinet considered the Draft Biodiversity Net Gain SPD. Consultation ran from Monday 23rd October to</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>developments, it must be demonstrated how each phase will reach a minimum of 10% Biodiversity Net Gain. The landowners and developers need a better understanding of how this will be assessed on a phase by phase basis in the context of emerging Government legislation and policy in order that the likely financial implications can be determined. The SPD should make it clearer that where there has been over-provision on one phase, the additional provision would contribute to a site-wide Biodiversity Net Gain figure which would be taken into account where an individual parcel could not meet the 10% requirement.</p> <p>2.11 In delivering Biodiversity Net Gain, the first approach will be to deliver the net gain on-site then off-site on adjoining land. The next options would be for contributions to be paid to a Council controlled scheme with the default to national credits as a last resort.</p> <p>2.12 A joint strategy is therefore required between the Council and the developers whereby each phase calculates what can be delivered on site in order that the financial costs of delivering off site can be calculated along with an agreed mechanism for securing on site net gain and off-site contributions.</p>	<p>Monday 20th November 2023. The approach to phased developments is included within the draft SPD.</p>
	<p>4. Phasing / Delivery</p> <p>2.13 The Draft SPD sets out an indicative phasing plan and strategy at section 6. It is proposed that the school and the local centre will be in an 'early phase' of development. The landowners and developers need to understand how the delivery of these facilities will be secured and whether there will be triggers or pre-commencement requirements for the delivery of the school land and the local centre/s in relation to a particular phase of development or a certain number 4 of units. The SPD</p>	<p>The need for more certainty relating to the delivery of key items of infrastructure is acknowledged. As such, the phasing strategy of the SPD will be amended to ensure further clarity.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	should provide more certainty in relation to the delivery of these facilities, the associated timeframes and triggers.	
	2.14 The Draft SPD also identifies a location for a secondary local centre / community hub on the cricket pitch land. There is no justifiable need for a secondary local centre, this will take focus and footfall away from the main local centre.	There is no cricket pitch land on the Thornhills site. However, the reference in the SPD is to a 'Potential' secondary local centre/community hub. The justification for this is provided in the policy wording (i.e., to ensure that community facilities are available to all residents within easy walking/cycling distance). As the purpose would be to provide a more accessible facility if required as the Garden Community delivery progresses, it is not considered to undermine or take away the focus/footfall from the primary local centre.
	<p>5. Roof Tax / Viability</p> <p>2.15 It is acknowledged that the SPD is rightly seeking a “gold standard” for every aspect of the development to meet with member and officer aspirations. However, it is currently not possible to determine the effect of meeting the various requirements on viability. In particular, the SPD sets out a requirement for contributions to be made via a “roof tax”, but no figure per dwelling is provided. It is therefore not possible to assess viability at this stage.</p> <p>2.16 Other matters which affect viability include the M4:2 requirements, provision of self and / or custom build units, mix of units, off-site contributions to meet Biodiversity Net Gain requirement. There is no flexibility within the wording of the Draft SPD to support delivery should viability be an issue.</p>	One of the purposes of the SPD is to identify the infrastructure and other requirements that are associated with the Garden Community. It is not a “gold standard” or a member/officer shopping list – all elements are going to be justifiable given the nature and scale of the development proposals. The basis for the calculation of the roof tax is set out in the SPD but given the uncertainty over the total projected construction costs of the Roof Tax infrastructure package, it is not practicable to provide a per dwelling figure in the SPD – this will feature in the s106 agreements.
	<p>6. Collaboration Agreement</p> <p>2.17 At section 6.5 of the Draft SPD it is stated that on submission of any planning application, the LPA will need to be satisfied that a legally binding Collaboration Agreement has</p>	In order to satisfy the requirements of Policy IM7 – Masterplanning , the Council will need to be satisfied that a Collaboration Agreement (CA) has been entered into by all relevant landowners to provide reassurance to the LPA that delivery of key parts of the Garden Community are capable of

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>been entered into by all relevant landowners. We understand the need for the Council to have sufficient reassurance that the delivery of key elements of the rest of the Garden Community can be secured. However, there is an issue of timing, and it is suggested that the Collaboration Agreement should be provided prior to determination, rather than as a validation requirement. The landowners and developers also need clarity of exactly what is expected and from whom to meet this requirement.</p> <p>2.18 Given the number of landowners involved, some flexibility should also be provided in the event that at the time of determination of an application the majority of landowners are able to provide a Collaboration Agreement.</p>	<p>being brought forward in a comprehensive manner. I am pleased to note that you acknowledge the need for the Council to have sufficient reassurance that the delivery of key elements of the rest of the Garden Community can be secured. However, you have highlighted an issue of timing and have suggested that the CA should be provided prior to determination, rather than as a validation requirement. You have asked for clarity on exactly what is expected and from whom to meet this requirement. You have also referred to the number of landowners involved and suggested that some flexibility should also be provided in the event that at the time of determination of an application only a majority of landowners are able to provide a CA.</p> <p>Parties</p> <p>In terms of the Thornhills Garden Community, the Council acknowledges that requiring all landowners across the entire Masterplan area to enter into a single CA would be disproportionate, could stymie delivery of the wider Garden Community and would not be necessary to address the policy requirement of Policy IM7 – Masterplanning to achieve comprehensive development. Therefore, the Council considers that CAs can properly relate to locations where there are specific interdependencies across landholdings which, if not properly addressed, could give rise to commercial issues placing at risk the comprehensive delivery of the Garden Community. The anticipated timing of delivery and infrastructure requirements will also be relevant considerations.</p> <p>Applying this test to the Thornhills Garden Community, given the anticipated timing of delivery, the central section of the Garden Community is expected to come forward first. It also incorporates key Garden Community infrastructure including</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
		<p>the spine road, school, formal park and local centre. Given this, it is considered necessary that all landowners in this central section are included within the CA. This will provide sufficient reassurance to the Council that there are no commercial impediments to the delivery of this central section, (in particular the infrastructure) and will address the policy requirement in Policy IM7 – Masterplanning for comprehensive delivery.</p> <p>Timing</p> <p>The SPDs require CAs to be provided at validation because the Council needs an early reassurance that the policy requirement of Policy IM7 – Masterplanning has been addressed. The Council must consult on a planning application that is Policy IM7 – Masterplanning compliant and demonstrates that comprehensive development will be achieved.</p>
	<p>7. Education Land</p> <p>2.19 The SPD states that the new primary school is likely to be ‘one form entry’, rather than ‘two form entry’ as had previously been suggested. However, the masterplan at paragraph 5.4.1 still sets aside 1.5 hectares of land to deliver the school, which is based on delivering a two form entry school. In the event that less land is required to deliver the school, the SPD should support the delivery of additional housing on the surplus land. This approach would also help to address any shortfall in total number of dwellings delivered across to the site compared to the number allocated in the Local Plan.</p>	Noted
	<p>5 8. Submission of Outline / Hybrid Applications</p> <p>2.20 The introduction to the SPD makes reference to detailed planning applications, only in validation requirements section at paragraph 8.2.2 is there reference to an outline permission,</p>	The wording of the SPD cannot restrict the type of application that is ultimately submitted.

Consultee	Comment	Council response and SPD amendment (where applicable)
	where it is advised that the advice of the LPA should be sought for an outline permission. There may be instances where an outline or hybrid application is submitted and the SPD should be sufficiently flexible to allow the planning strategy for the site to evolve over the lifetime of the development of the site.	
	<p>Paragraph Specific Comments</p> <p>2.21 Paragraph 1.1.7 acknowledges that the Garden Community will be delivered over a long period of time, during which planning policies and guidance are likely to be updated. This paragraph should also acknowledge that it is important the SPD has sufficient flexibility to accommodate changes in market conditions, lifestyle and demographics.</p>	Specific policies contained within the Local Plan (providing the policy basis for this SPD) contain the necessary level of flexibility to accommodate for changes in market conditions, lifestyle, and demographics, for example Policy HS3 – Housing Mix and Policy HS6 – Affordable Housing .
	2.22 The Density Plan on page 24 should make it clear that the densities shown are net density figures.	Noted – modification agreed.
	2.23 Paragraph 4.2.4 highlights that three parcels on the southern edge of the site area specifically identified for potential SME builders. Paragraph 5.2.20 states that a Small to Medium Enterprise is defined in the Government’s SME Action Plan. For clarity the definition should be provided in the document. The Action Plan states that an SME is any organisation that has fewer than 250 employees and a turnover of less than €50 million or a balance sheet total less than €43 million.	Noted – modification agreed.
	2.24 Page 31 sets out the development guidelines for Self and Custom Build Housing and the SME parcels. The SPD should provide greater clarity on the definition of Self and Custom Build Housing and the expectations for what is expected to be delivered.	The text refers to the Self and Custom Housebuilding SPD , which will provide detailed guidance on provision. This SPD was adopted by the Council on 29 November 2023.

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>2.25 Paragraph 5.5.5 refers to a policy shortfall in terms of playing pitch and sports provision. It is questioned whether this would be addressed through the provision of a playing pitch as part of the new school. If a contribution is to be paid how will this be calculated for each land parcel. The SPD should provide developers with greater certainty as to the contributions that would be required so that viability can be fully assessed.</p>	<p>Open Space will be provided in line with Policy GN6 – Protection and Provision of Open Space, Sport and Recreation Facilities of the Calderdale Local Plan.</p> <p>As highlighted in Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road, Brighouse of the Local Plan, provision of Open Space on the allocation will be above policy requirements. The specific breakdown of phase-by-phase typology requirements, and total provision, is indicated in the Development Guidelines section of the SPD. Specific detail of provision (within each typology) will be in accordance with the guidance provided in the SPDs and determined at the time of each phased application in consultation with the Council's Open Space Team.</p>
	<p>2.26 Paragraph 5.7.5 states “Unless it is justified and evidenced, all routes will be LTN 1/20 compliant”, this should be amended to read “Unless it is justified and evidenced, all primary routes will be LTN 1/20 compliant”. This sentence is also repeated in the ‘Principle of Development’ text box below paragraph 5.7.21, where the same amendment should be made.</p>	<p>LTN 1/20 standards do not solely relate to the primary route.</p>
<p>1246329</p> <p>Historic England James Langler</p>	<p>THMP29 & WOMP52, WODC26, THDC25</p> <p>THORNHILLS GARDEN COMMUNITY SUPPLEMENTARY PLANNING DOCUMENTS (SPD) – LOCAL PLAN SITE LP1463</p> <p>Historic England is the Government’s statutory adviser on all matters relating to the historic environment in England.</p> <p>We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS).</p>	<p>Noted.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.</p> <p>Thank you for consulting Historic England on the above documents. Our comments on the Thornhills Garden Suburb Masterplan and Design Code SPDs are set out in Appendix A.</p> <p>If you have any queries or would like to discuss anything further, please do not hesitate to contact me. Yours faithfully James Langer James Langer Historic Environment Planning Adviser (North East and Yorkshire Region) e-mail: james.langer@HistoricEngland.org.uk</p>	
	<p>1 Appendix A: Table of Historic England's comments on Thornhills Garden Suburb Masterplan and Design Code SPDs</p> <p>Masterplan Page Section Comments</p> <p>17 Paragraph 3.1.3, 9th bullet point</p> <p>Whilst we welcome the acknowledgment given to the importance of the setting of the Grade II Listed building Woolrow and Woolrow Farmhouse to its significance, we suggest an amendment to the wording of this bullet point is required as follows:</p> <p>"The setting of the Grade II Listed buildings at Woolrow Farm (30m north of the site) is identified in the CMBC Heritage Impact Assessment as an making an important contribution to the significance of the designated heritage asset.</p>	<p>Agree with suggested amendment.</p> <p>The setting of the Grade II Listed buildings at Woolrow Farm (30m north of the site) identified in the CMBC Heritage Impact Assessment as making an important contribution to the significance of the designated heritage asset.</p>
	19 Paragraph 3.2.2, 3rd bullet point	

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>We welcome that the Masterplan recognises the contribution that non-designated heritage assets, including historic field boundaries and stone walls make to the area and that, alongside designated heritage assets, these should influence the layout and character of development parcels.</p>	<p>Noted</p>
	<p>21-22 4 Masterplan Framework</p> <p>We are concerned that Residential Parcel R1 encroaches into the area of high sensitivity highlighted in the Councils Heritage Impact Assessment for the site. It also diverges from the indicative development area shown for site LP1463 in Appendix 1 of the adopted Calderdale Local Plan.</p> <p>It is a requirement of the Planning (Listed Buildings and Conservation Areas) Act 1990 that “special regard” should be had to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess. When considering the impact of proposed development on the significance a designated heritage asset the NPPF states that “great weight” should be given to the asset’s conservation, with any harm to, or loss of, significance (from its alteration or destruction, or from development within its setting) requiring clear and convincing justification. The reason for making this change is not made clear in the Masterplan document, including whether it is justified by new evidence prepared after the close of the Local Plan examination.</p>	<p>Noted - a section of parcel R1 encroaches into land identified as being highly sensitive in the HIA. Discussion between the Council’s Conservation Officer and the masterplanning team resulted in the suggested wording included in section 5.8. It is considered that suitable mitigation would be possible to minimise the impact on the significance of the heritage asset in this small section of parcel R1.</p>
	<p>38 5.8 Heritage, paragraph 5.8.1</p> <p>We welcome that the heritage section of the Masterplan includes an upfront reference to the need to make a contribution to the repair of Woolrow and Woolrow Farmhouse from those residential development parcels to the north of Jay House Lane which are considered to impact the setting of the listed building.</p>	<p>Noted</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	This is reasonable given the need for planning obligations to be necessary to make the development acceptable in planning terms and directly related to the development.	
	<p>38 5.8 Heritage, paragraph 5.8.2</p> <p>We welcome that the Masterplan reiterates the requirement for planning applications to implement the recommendations of Council's Heritage Impact Assessment or other suitable mitigation measures agreed by the Local Planning Authority to avoid or minimise harm to the significance of heritage impacts. It is also appreciated that a link to the HIA is provided in the Masterplan document for ease of reference.</p> <p>38 5.8.4 Principles of Development, 1st bullet point</p> <p>We would ask for a minor change to the first bullet point under 5.8.4 Principles of Development in recognition that there are other heritage assets besides listed buildings related to the site as follows:</p> <p>“• Development proposals must be informed by an understanding of the significance of heritage assets in the area, the listed buildings and the contribution made by their setting.”</p>	<p>Noted</p> <p>The third bullet point in paragraph 5.8.4 has been written in recognition of the other heritage assets that exist in the area.</p>
	<p>58 Appendix 1 – Anticipated S106 Requirements for Each Phase</p> <p>We support the inclusion of a contribution towards securing the repair of the Grade II Listed Woolrow and Woolrow Farmhouse under the list of anticipated S106 requirements in line with the site specific criteria of Local Plan site allocation LP1563.</p>	Noted
	<p>62 Appendix 2 - Validation Requirements</p> <p>We welcome the inclusion of the validation requirement to prepare a Heritage Statement or Heritage Impact Assessment</p>	Noted

Consultee	Comment	Council response and SPD amendment (where applicable)
	(as appropriate) and Archaeological Appraisal in support of any forthcoming planning application.	
	<p>Design Code Page Section Comments</p> <p>- General comment</p> <p>Whilst there are a handful of references to the historic environment and individual heritage assets scattered throughout the Design Code there is no specific section, or sub-section (e.g. within the built form chapter), of the code dealing with specifically with heritage considerations. This matter should be addressed before the code is finalised.</p>	<p>The Council's Conservation Team have been consulted throughout the Local Plan process, in the formation of this SPD and also will be on submission of phased planning applications. The Conservation Officer was involved in the production of the character appraisal and crucially how this appraisal, along with other evidence bases such as the Heritage Impact Assessment, informed the detailed design code.</p> <p>As stated, there are various references throughout the document to the historic environment and a heritage section within the Development Guidelines Chapter. Furthermore, applications should implement the recommendations provided in the site wide HIA (or other suitable mitigation measures) and there is a requirement for a site specific HIA to be submitted with each phased application.</p> <p>As such, it is considered that the above, along with the policy framework established in the Local Plan, provides the necessary level of focus on addressing heritage considerations.</p>
	<p>7-8 Masterplan SPD</p> <p>See comments above on the Masterplan Framework regarding the defined development parcels.</p>	Noted – responded to above
	<p>13 Paragraph 1.2.3, 9th bullet point</p> <p>Whilst we welcome the acknowledgment given to the importance of the setting of the Grade II Listed building Woolrow and Woolrow Farmhouse to its significance, we suggest an</p>	Agree with suggested amendment.

Consultee	Comment	Council response and SPD amendment (where applicable)
	amendment to the wording of this bullet point is required as follows: "The setting of the Grade II Listed buildings at Woolrow Farm (30m north of the site) is are identified in the CMBC Heritage Impact Assessment as an making an important contribution to the significance of the designated heritage asset.	
	14 1.2 Site Constraints The zone of visual influence illustrated on page 14 for the Listed Woolrow and Woolrow Farmhouse bears no resemblance to the more thorough consideration of the assets setting within the Heritage Impact Assessment. This could give a false indication of the area of high sensitivity and should either more closely reflect the HIA or be removed from the figure entirely as it is counterproductive.	Agree to remove indicated zone.
	15 Paragraph 1.3.2, 3rd bullet point We welcome that the Design Code recognises the contribution that non-designated heritage assets, including historic field boundaries and stone walls make to the area and that, alongside designated heritage assets, these should influence the layout and character of development parcels.	Noted
	97 Beck Valley Character Area. We welcome the reference to the area needing to be very carefully designed to ensure that it enhances rather than detracts from the special character of this part of the site with a high-quality bespoke design solution.	Noted
	139 Appendix – Design Compliance Checklist It is disappointing to see that there are no specific compliance requirements relating to the conservation and enhancement of the historic environment. This is likely to be a consequence of there being no specific coverage of heritage consideration in the document.	The Design Compliance Checklist is specifically linked to the chapters of the Design Code. See response above regarding the integration of heritage considerations throughout the Design Code.
1246930	WOMP53 & WODC27, THMP30, THDC26	

<p>Woodhouse Residents Association</p>	<p>CALDERDALE LOCAL PLAN SUPPLEMENTARY PLANNING DOCUMENT (SPD) CONSULTATION</p> <p>Woodhouse and Thornhill Garden Communities - Design Guide and Masterplan Documents 2023</p> <p>Woodhouse Residents Association 24 September 2023</p> <p>1.0 INTRODUCTION</p> <p>1.1 The WRA was formed and constituted in September 2019 following the Stage 1 Local Plan Inquiry to collectively respond to the Local Plan process and potential delivery of the Woodhouse Garden Community. The WRA continues to grow and currently has 280 members drawn from the local residential and business community and representing a large proportion of properties in the area.</p> <p>1.2 We welcome the opportunity to comment on the detailed Supplementary Planning Documents (SPD) for the two Garden Communities at Woodhouse and Thornhill which will be used to control the proposals as planning applications come forward.</p> <p>1.3 Given the four-week time constraint imposed on the consultation, we have had to restrict our comments to the Woodhouse Garden Community documents. It is noted that some of the information is replicated in both sets of documents for the two communities. For clarity, where the information is repeated, our comments relate to both of the Garden Community SPD's.</p> <p>Consultation Process</p> <p>1.4 Four weeks does not provided sufficient time to comment on two very lengthy and detailed documents. No support has been provided to help communities understand these. Given the SPDs have a direct impact on the existing Woodhouse community this is not acceptable. At the very least a public event should have been provided to give residents the</p>	<p>1.4) The Town and Country Planning (Local Planning) (England) Regulations 2012 require a Local Planning Authority to undertake public consultation on draft SPDs for a minimum</p>
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	<p>opportunity to ask questions and develop a level of understanding so they were properly equipped to respond. This seems inequitable and at odds with the General Place Shaping Design Guidance SPD which you are preparing and which has been given a proper engagement / consultation process. In relation to the overarching General Place Shaping Design Guidance SPD and good planning practice, this should have been consulted on and approved first. This would allow the strategic document to be used to set the context for the more detailed Garden Community design code to ensure proper alignment.</p> <p>On the 18 September 2023 the access to the Woodhouse Garden Suburb online portal was not available further exacerbating our ability to comment within the designated time. No warning or explanation was given. The following error message was shown.</p> <p><i>An error has occurred while loading the event</i></p> <p><i>![SPJD105] Cannot find entity</i></p> <p>We were grateful for the additional time provided.</p>	<p>of four weeks, and to take account of any comments received in preparing the final documents.</p> <p>Cabinet considered the draft SPD at its meeting of 7th August 2023 and authorised a four-week public consultation in compliance with regulations.</p> <p>The consultation ran from 25 August to 25 September. The vast majority of this period was outside of the school summer holidays in Calderdale. The documents were also accessible to view prior to the commencement of the consultation on the Committee webpages as the documents were approved for consultation at Cabinet on 7 August 2023.</p>
	<p>1.5 We appear to be commenting on the third stage of the masterplan processing isolation, without the documentation that relates to its development. Why have we not been engaged in shaping the vision, objectives, and framework for these developments in our locality? Where are the framework plans that describe how the masterplan has been shaped so we can understand what the document is talking about? What is the consultation strategy? It is not clear if this is our only chance to comment. Will there be a further formal consultation on the final document or is this it? The documentation does not refer to any further engagement. Is there an Equality Impact Assessment for the policy document? This should have been prepared to ensure the policy process is fair and does not</p>	<p>The Statement for Community Involvement (SCI) was adopted in 2016 and reflects the 2012 Regulations, set out in the introduction of the Consultation Statement. It also specifies additional measures that the Council will undertake in consulting upon draft SPDs, and these have been reflected in the consultation process for the Garden Communities draft SPDs.</p> <p>As identified in the adopted SCI, there are numerous methods that the Council has utilised to inform the public of the draft SPD consultation. Such methods included the following:</p> <ul style="list-style-type: none"> • Press Release - articles in Halifax Courier and Huddersfield Examiner.

	<p>present barriers to participation or disadvantage any protected groups from participation.</p>	<ul style="list-style-type: none"> • Social Media - regular updates on Council Twitter feed and Facebook pages. • Email notifications sent to approx. 4000 people registered on the Council's consultation portal. • Email notification to all ward councillors and landowners prior to commencement of consultation period. • Calderdale Council website updates and notifications. • Hard copies of the documents posted in all libraries across the borough. • Telephone number and email address provided should anyone require further detail, assistance in viewing the document or assistance in working the Council's online consultation portal. • Hard copies of documents delivered to residents who have difficulty accessing online versions, or those posted at libraries. <p>Many comments were received from various stakeholders on the allocation of the site in the Local Plan. The issues raised during the Local Plan preparation informed the resulting Site Specific Considerations in Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road, Brighouse and Appendix 1 – Site Number LP1451 – Land between Bradley Wood and Woodhouse Lane, Rastrick, many of which were recommended as Main Modifications by the Inspector, and it is these on which the SPD has built.</p> <p>This SPD consultation is an opportunity for all stakeholders to make comment on the draft documents and help shape the final Masterplans and Design Codes.</p> <p>The SPD does not introduce new policy and provides further details on the principles established in the Local Plan. The</p>
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		Local Plan Policies and Allocations were subject to an Equality Impact Assessment.
	1.6 Notwithstanding the Sustainability Assessment undertaken on the Local plan, given the significant cumulative and other environmental impacts that will arise from the Garden Community developments, has there been a screening process on the SPDs to assess whether a Strategic Environmental Assessment (SEA) is required?	<p>The Planning Practice Guidance referred to above also provides details on whether SPDs require a Sustainability Appraisal or a Strategic Environmental assessment (SEA). The guidance states that</p> <p>“Supplementary planning documents do not require a sustainability appraisal but may in exceptional circumstances require a strategic environmental assessment if they are likely to have significant environmental effects that have not already have been assessed during the preparation of the relevant strategic policies”.</p> <p>Given the Local Plan policy Policy IM7 – Masterplanning was subject to the Local Plan Sustainability Appraisal that incorporated the relevant requirements of the SEA Directive and both Garden Community Site Allocations were also subject to the same assessment there is no further requirement to carry out SEA against these SPDs.</p>
	<p>1.7 We are dismayed to have also been contacted by Redrow Homes/IDP Planning who have launched their pre-application consultation for a phase 1 development on the Woodhouse Site at the same time. If this isn't bad enough, no explanation was issued to the community to explain the connection between the two processes/documents or the differences. This has resulted in significant confusion for our members who have complained they do not know what /which they should be commenting on.</p> <p>1.8 The bullying tactics employed by the developer/agent of phase 1 has been a common theme throughout the Local Plan process and something we have come to expect. Whilst we appreciate they have a right to submit an application whenever they like, this really is not good enough given the requirements of Policy IM7 - Masterplanning. It shows a total disrespect for</p>	<p>(1.7 + 8) While the Masterplanning team has worked closely with the phase 1 developers to ensure the principles of the SPD are enshrined within the emerging schemes, the Council cannot control the developer's timescales including the decision to carry out a pre-application public consultation at a similar time to consultation on the draft SPDs.</p> <p>Once adopted, the SPDs will become material planning considerations against which any forthcoming applications will be assessed against.</p>

	<p>what has been agreed through the Local Plan process and the achievement of proper, transparent and effective engagement with the community.</p> <p>1.9 We have no doubt you will say (as previously) that the release of the Redrow consultation is nothing to do with the Council. However, as you have indicated you are working in partnership with the landowners/developers to bring the site forward it brings into question your professionalism and your understanding of transparent engagement. Do you really think it is a good idea to issue the pre-application consultation before the SPD's have been adopted? If this was on your doorstep, would you really think it was acceptable? What is the point of the local plan you have just adopted?</p> <p>1.10 The position you have put us in is unacceptable and difficult to understand. We are being asked on the one hand for our views on a pre-defined vision and what the regulations and parameters should be for the site and at the same time, before these elements have even been consulted on or agreed, our views on phase 1. We refer you back to your own words in the SPD which states at paragraph 1.1.3 that the adopted SPD :-</p> <p><i>....is intended for use by anyone involved in the planning application process. It should be used by residents, developers, builders and agents including architects and planning consultants in shaping development proposals. It will inform the Council's pre-planning application service and will assist the Local Planning Authority in making clear and consistent decisions on planning applications.</i></p> <p>Your approach has failed to give us the ability to use it to make comments on the Redrow pre-application because the parameters for the site are not yet set and it is not an adopted document.</p>	
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	<p>1.11 Generally the two documents lack consistency and seem to be unfinished in parts and some keys in plans do match what is shown on the plans. This is confusing and makes the reader question the accuracy and professionalism of the document and what authority it will have in guiding or regulating planning submissions and developers. The language used in the document is woolly and heavily caveated. Caveats within a lot of these statements continue to dilute the authority of the document and make it meaningless in terms of a design code/masterplan to be abided by. Language is not always understandable – it needs to be in plain English. As a basic principle - do not use three letter abbreviations without providing ‘in full’ first and make sure there are explanations of acronyms. You might know what it means but we don’t! The documents do not appear to have been proof-read to ensure they are fit for release This suggests the documents are being rushed through. They are also very repetitive so consequently our comments similarly repeat in response.</p>	<p>1.11 Noted. Various modifications have been proposed and will be carried forward to the final versions of the documents.</p>
	<p>1.12 It is really not clear how the masterplan and design code SPD documents fit/work together. The Masterplan should be the key document and we would expect the Design Guidance (or code) should be just one of a number of complementary documents that show the context, how it has been arrived at and how it will be supported. It is unclear where the rest are! Providing both together in the current format has made it very confusing, not least because the two documents have not been adequately proof-read to ensure they are consistent and well aligned. There are so many mistakes and inconsistencies that warrant it a useless exercise.</p>	<p>(1.12) Please refer to the “How the SPD will be used” section commencing at paragraph 1.1.2 in the Draft Woodhouse Garden Community Masterplan SPD.</p>
	<p>1.13 We raise significant concern that no further work has been done on the transport modelling to verify the mitigations required and housing number trigger points to guide this masterplan. The A641 Corridor Improvement Scheme is fundamentally different, no longer includes the specified</p>	<p>(1.13) Further modelling work will be undertaken for the individual planning applications. Mitigation will be required at any junctions where there is a severe traffic impact.</p>

	mitigations required within the Infrastructure Delivery Plan (IDP) and is still not even approved or committed, with no dates for delivery.	
	<p>1.14 As this is a strategic site, in multiple ownerships, this is fundamental information to confirm what the required infrastructure is, when it will be delivered and how collaboration/equalisation will work to deliver the site in its entirety. You now imply that if mitigations do not come forward you may have to restrict the numbers in later phases. Given we already know the mitigations are not coming forward as part of the A641 scheme it implies this is now inevitable and the site cannot be developed in full. How can the required infrastructure be delivered for the site once the 680 homes trigger is reached?</p>	<p>(1.14) The Masterplan and Design Codes will ensure that the wider site is delivered in a comprehensive manner. Pre-application meetings have been held with the individual housebuilders and their proposals adheres to these documents.</p> <p>The A641 scheme has not been paused and designs are being developed.</p>
	<p>1.15 In summary we find the SPD's to be contrary to Local Plan Policy IM7 – Masterplanning and the Infrastructure Delivery Plan. They conflict with the adopted local plan and are open to challenge, as they:-</p> <ul style="list-style-type: none"> • fail to demonstrate adequately how the site will be delivered comprehensively with the required infrastructure • fail to adequately cover collaboration and equalisation arrangements especially in relation to transport and education infrastructure • fail to adhere to the principles set out in the local Place Shaping Design Guidance SPD as it's not adopted yet • fail to show what the traffic impacts will be or how these will be mitigated. Transport work is still required to understand this • fail to assess the impact of the development on existing and planned infrastructure • fail to show how secondary school provision will be delivered 	<p>(1.15) Noted – see the relevant responses in the detailed comments section below.</p>

	<ul style="list-style-type: none"> • fail to assess the need for and what the appropriate facilities should be for this new community. In relation to some elements, they also fail to show how these will be delivered other than saying by a third party. This is insufficient to secure delivery. • fail to fully understand historic assets in particular archaeological and non designated heritage assets • have failed to adequately engage the community in the preparation process –specifically phases 1 and 2. 	
	<p>2.0 DETAILED COMMENTS</p> <p>2.1 Given the strategic nature of the garden community sites and the significant impact they will have, both documents need to accord/align with all key SPD guidance. Reference is made to these on Page 6 of the Design Guide SPD.</p> <p>We request that these documents be adopted first to inform any pre-application discussions prior to planning applications being submitted to ensure adequate controls are in place for the delivery of the sites. This should form part of the validation process.</p>	<p>(2.1) The Council cannot control the developer's timescales including the point at which an application is ultimately submitted.</p> <p>Any forthcoming application will be determined against the adopted Local Plan and any other material considerations relevant at the time of submission.</p>
	<p>We note some have been consulted on already (Affordable Homes and Self Build / Custom Build), although these are not yet adopted as policy. The general Place Shaping Design Guide, Biodiversity Net Gain, Flooding and Public Open Space and Recreation (and potentially the Developer Contribution Guidance – if this impacts on the Garden Communities) SPDs have not been formally consulted on or approved. Without these in place, how can you effectively control the planning of this significant growth. These documents all need to be in place before any pre-application consultation takes place and inform the Masterplanning document to ensure consistency of approach. The time required to plan for strategic sites was thrashed out at the Local Plan Inquiry and as a result, at the</p>	<p>The Council will ensure that the emerging SPDs (as listed) will provide a consistent approach.</p> <p>The Council cannot control the developer's timescales including the point at which an application is ultimately submitted.</p> <p>Supplementary Planning Documents provide guidance on the implementation of Local Plan policies. They do not introduce new policy requirements. It is not feasible or considered necessary to prepare all other SPDs prior to the Garden Community Masterplan SPDs. Local Plan policies will apply to all planning applications determined prior to adoption of the other SPDs.</p>

	Inspector's direction, the garden communities were put back towards the end of the trajectory thus ensuring a proper and effective Masterplanning process could take place to control development. Why do you think it is appropriate to circumvent this at a cost to the proper planning of the settlements?	
	<p>WOODHOUSE DESIGN CODE SPD</p> <p>2.2 We make the following comments about the Woodhouse Design Code SPD.</p> <p>VISION AND ETHOS</p> <p>Page 1/2</p> <p>Why have we not been involved in shaping this? This is our community. We seem to have gone back 30 years in terms of effective community engagement.</p> <p>The Vision and Ethos needs to be clearer and must align with the overarching principles that are being developed in the General Place Shaping Design Guidance SPD to ensure consistency. These will be applicable to all Calderdale developments, including the Garden Communities.</p> <p>Specifically, the vision needs to be stronger on and reference:-</p> <ul style="list-style-type: none"> • delivering inclusive design and ensuring these are dementia friendly places 	<p>A key ethos of the Garden Community, as derived from the TCPA's Garden City Principles, is that of an inclusive neighbourhood. This refers to accessible, affordable and liveable neighbourhoods for all members of society.</p> <p>The Placemaking SPD, which will be a material planning consideration once adopted, includes specific reference to dementia friendly places (Section 6.2 – Inclusive Design).</p>
	<ul style="list-style-type: none"> • considering and acting on the climate emergency and requiring low energy, high performance homes that contribute to reducing carbon emissions 	<p>Agree to amend paragraph 1 on page 13 to say:</p> <p>"Calderdale Garden Communities will promote a sustainable way of living in line with the Council's commitment to help combat climate change. The communities will deliver low energy, high performance buildings including homes for all, new schools..."</p>
	<ul style="list-style-type: none"> • mention is given to protecting and enhancing the natural environment but this must also include the significant historical 	<p>The vision and core objectives section of the document establishes an overriding approach. The level of detail referenced in these comments would be for the specific</p>

	<p>and visual/scenic quality of the landscape character and protection of Public rights of Way (PROW)</p> <ul style="list-style-type: none"> • integrating the distinctive neighbourhoods of the Garden Community into the wider Woodhouse area as a whole to create a settlement that works. This must include :- <ul style="list-style-type: none"> o designing the site to keep through-traffic away from where people live and ensuring the existing Woodhouse area is NOT used as a rat run; and o Showing respect and empathy for the existing Woodhouse residents, their privacy, amenity and lifestyle. • requiring a holistically planned settlement with homes that are needed in the right places, including high quality affordable housing • providing public transport that is good value, frequent, high quality and reliable. This is essential for it to be feasible especially since the Woodhouse site is NOT in walking distance of the town centre and the documents indicate that a bus service will not be feasible. So much for what you have promoted as 'sustainable' communities. 	<p>chapters and subject strategies, such as the movement strategy and the built form chapter.</p> <p>It is noted that the comments are in alignment with the detail of the SPD, including consideration of existing residential amenity, holistically planned development, provision of affordable housing and public transport provision.</p>
	<p>Underpinning the ethos:</p> <ul style="list-style-type: none"> • 'Retain and enhance ecology' appears a bit conflicting when it is greenbelt that has been removed to facilitate the development. • Working with the topography does not seem to have been thought through in terms of accessibility when aligned with active travel. 	<p>The principle of development on this site was the subject of in-depth discussion throughout the Local Plan examination process. As a result, the land was removed from the Green Belt and allocated as a Garden Suburb on adoption of the Local Plan (22nd March 2023).</p>
	<ul style="list-style-type: none"> • What does embedded in the DNA of Calderdale mean? 	<p>Agree that "Embedded with the DNA of Calderdale" is not clear.</p> <p>Agree to replace bullet point with "Distinct identity rooted in its locality and characteristically of Calderdale".</p>

		Note: Update in all 4 documents.
	<ul style="list-style-type: none"> • Define day to day facilities? Who has decided on what these are and what is required? 	Term day-to-day need refers to activities carried out daily. This is a term used frequently in the National Planning Policy Framework, included specifically in chapter 8 - Promoting healthy and safe communities.
	<p>Page 5</p> <p>CONSULTATION AND PLANNING APPLICATIONS</p> <p>It is very disappointing that the community has not been engaged or been seen as a key stakeholder in the development of key principles. This is contrary to the Garden Community Toolkit advice on engagement and the Local Plan Policy IM7 -Masterplanning. We have already referenced the inadequate consultation process on these documents. The result is, rather than a process of collaboration, you have alienated us – we feel we are being done to rather than being engaged with. We agree all planning applications must be subject to a Design Review process to give an added layer of control/input.</p>	See above responses.
	<p>Page 6 – CONTEXT</p> <p>The Local Policy Context refers to the Thornhills Garden Community. We believe this is a cut and paste error and the section should talk about the context of the Woodhouse Garden Community.</p>	Noted – amendment agreed.
	<p>Reference is made to the overarching Place Making Design Guidance SPD currently underway. From a strategic point of view, it is unclear why this document has not been developed first to set the overarching context in which the Garden Communities SPD's should sit. The Garden Community SPD's should then develop the detailed requirements for the sites.</p> <p>Your approach is contrary to Local Plan Policy IM7 - VIa which states the masterplan must:-</p>	The Council will ensure that the emerging SPDs (as listed) will provide a consistent approach.

	<p>VI a. Demonstrate how the proposal adheres to the principles set out in the National design Guide and any local design guides or design codes</p> <p>The local 'Place Making Design Guidance SPD' has not been repared/adopted yet so it cannot show how it adheres to its principles.</p>	<p>Once adopted, the SPDs will become material planning considerations against which any forthcoming applications will be assessed against.</p>
	<p>The same applies to all the key SPD's. These must be developed and approved first to set the context and strategic direction of the Garden Community SPD's. Your approach is the wrong way round and this is unacceptable.</p> <p>We agree all SPD's must be material considerations once adopted. It is not acceptable for any planning applications to be considered on the Garden Communities without these in place.</p>	<p>Applications will be determined against the adopted Local Plan and any other material considerations relevant at the time of submission.</p>
	<p>Text to be changed to MUST from 'should' a follows:-</p> <p>"Once adopted, these documents will become material considerations in the determination of planning applications and will explain in detail how specific policies in the Local Plan MUST be implemented."</p> <p>Page 7</p> <p>MASTERPLAN SPD - DESIGN PRINCIPLES</p> <p>This refers to the Key Design Principles for the Masterplan. Is this the Regulatory Plan? The document is not clear on this.</p>	<p>Throughout development of the masterplan and design code documents, careful consideration has been given to the choice of wording and the implications this may have. The Calderdale Local Plan is ultimately the policy framework upon which these documents are based, any planning application will therefore need to be in conformity with these policies - it cannot go further or introduce policy. A delicate balance must be achieved in providing supplementary guidance and avoiding producing a rigid set of parameters that results in an unusable document that could in turn stymie delivery of the Garden Community.</p>

	<p>The Regulatory Plan/Masterplan needs to be shown as a whole plan – not split in two. It is difficult to understand how the whole site functions without this.</p> <p>The masterplan is contrary to the requirements of Local Plan Policy IM7 -Masterplanning. We will outline this in more detail in the Masterplan SPD but in summary it fails to address:-</p> <p>– effective and transparent community involvement. NPPF 2021 states at para. 127.</p>	<p>Please see chapter 2, section 2.1 – Regulatory Plan. Issue dependent on viewing options on individual computer programmes.</p>
	<p>“Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area’s defining characteristics”. (our underlining)</p>	<p>Policy BT1 – High Quality Inclusive Design of the Calderdale Local Plan provides the policy framework for achieving quality design. This policy was subject of scrutiny throughout the Local Plan examination process and subject to various rounds of public engagement.</p> <p>Many comments were received from various stakeholders on the allocation of the site in the Local Plan. The issues raised during the Local Plan preparation informed the resulting Site Specific Considerations in Appendix 1 – Site Number LP1451 – Land between Bradley Wood and Woodhouse Lane, Rastrick, many of which were recommended as Main Modifications by the Inspector, and it is these on which the SPD has built.</p> <p>This SPD consultation is an opportunity for all stakeholders to make comment on the draft documents and help shape the final Masterplans and Design Codes.</p> <p>Please also refer to the above comments regarding the Town and Country Planning (Local Planning) (England) Regulations 2012.</p>
	<p>how the proposal adheres to the principles of the local ‘Place Making Design Guidance SPD’ (Local Plan Policy IM7 VIa) - previously explained above</p>	<p>See responses where more detail is provided in comments to Masterplan SPD.</p>

	<p>– “Measures to mitigate the traffic impacts of the proposed development on the strategic and local road networks” (IM7 Vli) and assess</p> <p>“the impact of the development on existing and planned infrastructure and the identification of new infrastructure resulting from the development as a whole”.(IM7 VIj) and identify</p> <p>“ measures to ensure timely delivery of new and improved infrastructure” (IM7VIk)</p>	
	<p>Traffic impacts have still NOT been assessed and consequently, there is no explanation of how impacts will be mitigated. An inadequate ‘ad hoc’ approach is being proposed which will deal with issues on a ‘site by site’ basis as planning applications appear. This is neither a comprehensive nor a co-ordinated approach as required on IM7 V.</p> <p>We already know the A641 mitigations that are shown as requirements in the IDP have been removed from the A641 Corridor Improvement scheme such as</p> <p>Huntingdon Bridge etc. Where is the guidance to address this? There needs to be a reassessment of how comprehensive development will be achieved. This fails to support the outcome that ‘Larger sites are well planned and provide infrastructure to support the development of place’.</p>	<p>The IDP is a “live” document and the schemes listed are subject to change dependent on factors such as viability, funding, or whether revised evidence shows a scheme is or is not required. The Inspector commented at some length in her Final Report on the A641 and acknowledged that many of the transport schemes are in the process of developing business cases.</p>
	<p>There is no assessment of the impact of development on existing and planned infrastructure. None of the previous Local Plan transport modelling has included the planned infrastructure – only the committed. You have confirmed further work needs to be done but then ignored it.</p> <p>This MUST be done now to verify the road network requirements and what new infrastructure is required to ensure deliverability of the site in totality and inform what contributions via equalisation are required. What you are doing is paving the</p>	<p>Appendix 1 – Site Number LP1451 – Land between Bradley Wood and Woodhouse Lane, Rastrick is accordingly flexible in this regard:</p> <p><i>Unless demonstrated otherwise through an up-to-date Transport Assessment, no more than 680 units shall be delivered in advance of the completion of the critical schemes listed in the IDP (2021). The IDP is a provisional list and is</i></p>

	<p>way for the first developers to get away without contribution, stymieing the development of the whole site and undermining the delivery of your agreed housing requirement.</p>	<p><i>subject to change as masterplanning work progresses and the A641 business case is developed.</i></p> <p>As explained at the Local Plan hearings, strategic modelling has been undertaken of the impact on infrastructure. Further, more detailed modelling will be required with the phased planning application submissions to determine whether there is a need for capacity improvements.</p>
	<p>Details of how the natural environment and heritage assets will be conserved and enhanced is insufficient. You have not demonstrated a good understanding of the natural environment, heritage assets and their setting both in the site and wider locality, whether designated or not in accordance with Policy IM7, VIr)</p>	<p>Noted</p>
	<p>Secondary school provision and infrastructure has not been addressed in accordance with the Infrastructure Delivery Plan (IDP) which sets out the necessary infrastructure. The Local Plan (para.16.63) and evidence confirms in terms of education that:-</p> <p>‘For some areas, such as Brighouse, where significant growth is anticipated, plans are already part of the process to identify potential sites for two new primary schools and a secondary school as part of the Garden Suburbs proposals’.</p>	<p>Significant changes in preferencing patterns have occurred which has resulted in far fewer extra district pupils seeking provision within Calderdale. This has released capacity in the Lightcliffe area. Developments in neighbouring Kirklees have also been delayed. Additional capacity will only be provided if required and will be based upon need (not demand) at the time that developments are in the delivery stage.</p>
	<p>There is reference to improved connections to an existing park behind the Woodhouse Gardens development and adjacent to the cricket ground. We are unsure what this is. We are not aware of a park in this location and it has never been promoted as such by the Council who own it. The cricket club may use the land for parking and storage. What are you referring to?</p>	<p>Reference is made to the area of Council owned land to the north of the existing cricket club. Proposals for the secondary access may include enhancements to this land.</p>
	<p>CONTEXT</p>	<p>The Council considers that this section adequately describes the relevant constraints.</p>

	<p>Overall the context is not adequately described or true for the Woodhouse area and some key constraints/opportunities are missing</p> <p>Some constraints are clear on what the constraint means. Others omit this. You need to be clear what each constraint means for consistency and clarity.</p> <p>P12</p> <p>Location plan should really show all the growth proposals that will occur/are occurring around the site to be meaningful in terms of context and how the site fits in with this. For example: Bradley Park housing site has started and Bradley golf course will be reduced.</p>	<p>The plan on page 12 is a site location plan, showing existing, rather than proposed development.</p>
	<p>The land off Woodhouse Gardens where an access, open space and an upgraded cricket pitch is proposed needs to be considered in the masterplan as a whole even though it is not in the allocation. How can this be deemed to be comprehensive if not? Common sense needs to be taken. The development does not stop at the red line boundary.</p>	<p>Noted and agreed.</p>
	<p>Also you continue to view the site in isolation and fail to consider the cumulative impact of what is going on around these major growth proposals. This is very poor planning practice.</p>	<p>The cumulative impact of development was assessed at a strategic level as part of the Local Plan Examination as is standard practice.</p>
	<p>Page 13 – 16</p> <p>CONSTRAINTS AND OPPORTUNITIES</p> <p>Constraints should refer to the following (noting that some of these may also present opportunity which has also been missed):-</p> <p>Not all heritage assets are referenced. Of note, as the extract below shows, there are some pockets of pre-1775 settlement on the Woodhouse Garden Community site as well as on the northern edge of the site at Ryecroft Lane. These are the</p>	<p>There is a more detailed list included in the heritage section of the Development Guidelines chapter. The Heritage Impact Assessment is also referenced and linked which provides further detail and analysis.</p> <p>The Council's Conservation Team and Historic England have been consulted throughout the Local Plan process, in the formation of this SPD and also on submission of phased planning applications. Historic England have welcomed the inclusion of the validation requirement to prepare a site-specific</p>

	<p>former farmsteads of Firth House Farm (centre of the Garden Suburb site), Upper Woodhouse (Woodhouse Farm) to the north and Toothill Green Cottage to the east (shown black on plan below)</p> <p><i>[Extract : Historic Landscape Characterisation Project 2017 p.585 : West Yorkshire Joint Services, WYAAS, Historic England]</i></p> <p><i>[Yorkshire OS Surveyed 1848 – 1850. Published 1854 – shows barns and cottages]</i></p> <p>The context needs to take account of this historical landscape and specifically the presence of the historic, Upper Woodhouse (previously Over Woodhouse) settlement. The aerial shot below shows the historic settlement continues to have a significant presence onto Ryecroft Lane (barns and farmers cottages) even though infilling has taken place between on the croft and orchards.</p>	<p>Heritage Statement or Heritage Impact Assessment (as appropriate) and Archaeological Appraisal.</p>
	<p>The cottages (5-9 Ryecroft Lane) and barns (6-10 Ryecroft Lane), while non-designated historic assets, place a distinctive landmark on the Woodhouse countryside. They can be seen from many vantage points within the site from public footpaths, across the surrounding fields and form a connect with the former rural farmsteads. They have strong group value within the main farmstead of Upper Woodhouse. This forms an interesting group with the nearby late-C17 Netherwood House and 5-9 Woodhouse Lane Cottages which are all listed.</p> <p><i>[Aerial shot of Upper woodhouse showing historic buildings with infill blocked in green]</i></p> <p><i>[View of barns and cottages from Firth House Lane, Clifton in the background]</i></p> <p><i>[View of barns and cottages from Ryecroft Lane within the site]</i></p>	<p>Agree to modification to include additional assets in list as advised by WYJS (see response within this document).</p>

	<p>Designated heritage assets in close proximity to the site - the barn at Shepherd Thorn Farm (grade II listed, Historic England ref: 1290881) and Anchor Pit Lock (grade II listed, Historic England ref: 1133862) also need to be referenced and considered and are omitted. We note that Kirklees Council have requested this in their comments on the Environmental Impact Assessment (EIA) scoping.</p> <p>In accordance with NPPF 2021 the following constraints should also be added</p>	
	<p>Veteran and notable trees on the site and adjacent which MUST be retained and buffered – see the Ancient Tree Inventory https://ati.woodlandtrust.org.uk/ and the site abuts ancient woodland. NPPF states :-</p> <p><i>“development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.”</i></p> <p>The veteran and notable trees are largely located outside the site on the periphery in the area proposed as open space and potential future access. Impact on these (to understand their ecological value) was not assessed through the local plan process and this MUST be done now.</p> <p>The last ecology report 2019 (provided in the Local plan evidence library) indicated that more hedgerows should be added, existing and perimeter hedgerows should be thickened. This presents a constraint on development. This requirement needs to be clear in the document along with a requirement to protect with 15m buffers.</p> <p>There are also other mature trees/hedges within/along the boundary of the site which have not been assessed due to access. Specifically, the mature tree line and hedgerow</p>	<p>Phased applications will be assessed against the quoted guidance in the NPPF relating to veteran and notable trees along with policy guidance in chapter 23 of the Local Plan – Green Infrastructure and Natural Environment, specifically Policy GN5 – Trees.</p> <p>As stated in Appendix 2 - Validation Requirements of the Draft Woodhouse Garden Community Masterplan SPD, a Tree Survey will be required on submission of phased planning applications as well as Ecological Surveys and Reports.</p>

	<p>bounding the south side of the Gatehouse needs to be assessed. Any access along this route will need to protect the trees and the setting of the non-designated Gatehouse heritage asset (as specified in the Heritage Impact Assessment).</p> <p>A tree survey is required to verify this irreplaceable habitat. This should have been done to inform the constraints, landscape strategy and regulatory plan. We can find nothing to verify this has been done.</p> <p>The ancient woodland, which lies within Kirklees local authority boundary, is also part of Kirklees Wildlife Habitat Network with sections designated as a Local Wildlife Site. You fail to mention this, only referring to the Calderdale Wildlife Habitat Network – again you are looking at the site in isolation and failing to address fragmentation etc.</p>	
	<p>Bradley Woods should be shown as a constraint on development due to the potential for significant negative impacts on the habitat-rich ancient-replanted woodland. Kirklees council comments reiterate this in their comments on the EIA scoping.</p>	Bradley Wood Ancient Woodland listed as a constraint in chapter 3: Site Constraints and Opportunities.
	<p>The document needs to be clear about the following :-</p> <p>AO • consideration will need to be given to indirect impacts on the ancient woodland such as increase in disturbance by residents and domestic pets and the spread of invasive species, particularly when considered cumulatively with site allocation HS11 within Kirklees.</p>	Agreed. Amendment proposed to the design guide to state that indirect impacts on off-site habitats such as ancient woodland will be considered and mitigation measures such as signage, footpath enhancements and fencing specified.
	<p>consultation is required with local wildlife groups in Calderdale and Kirklees. This must include Huddersfield Birdwatchers Club (not sure if there is one in Calderdale but if there is one should be included) and Calderdale and Kirklees Badger Protection Groups for local records of relevance to the site.</p>	Agreed. It is standard practice for records to be sought from local conservation organisations, as well as West Yorkshire Ecology, the local ecological records centre. Suggest the design guides require reports to meet CIEEM guidance.

	<p>habitats should be protected even if they are of low botanical interest. Extensive loss of these lower value habitats can still result in significant ecological effects, particularly in regard to providing an ecological buffer to Bradley Wood and as an important functional habitat for species such as breeding bird assemblages which may be significantly displaced from the site and the wider local area due to cumulative effects with other planned housing developments and local infrastructure projects.</p> <ul style="list-style-type: none"> • fragmentation of land must be prevented to facilitate the movement of wildlife between Calderdale, Kirklees and the wider area. 	<p>It is not possible for the development to protect all habitats. However, the site design will be informed by the Mitigation Hierarchy. The Biodiversity Net Gain assessment will quantify the baseline value of the pre-development habitats, including those of low botanical interest, and ensure that the development results in a Biodiversity Net Gain of at least 10%. In addition, the impact on wildlife sites such as Bradley Wood will be considered, and mitigation and enhancement measures specified.</p>
	<p>Applicants should refer to the Woodland Trust's 'Planning for Ancient Woodland – A Planners Manual' 2019</p>	<p>All planning applications will be assessed against Policy GN3 – Natural Environment in the Calderdale Local Plan, which requires developments to design-in wildlife, and provide appropriate management, ensuring development follows the mitigation hierarchy and achieves measurable net gains in biodiversity in accordance with the most up to date national and local guidance.</p>
	<p>Throughout the document there is an inadequate use of the word 'should' which dilutes the ability to secure a quality environment. This needs to be changed as follows.</p> <ul style="list-style-type: none"> • Request that existing trees and hedgerows changed to 'MUST' be retained subject to detailed aboricultural/ecological assessment for foraging and wildlife commuting and as well as enhanced, they MUST also be buffered from development to protect them at 15m • Change to 'MUST' - Designated and non-designated heritage assets, including historic field boundaries MUST influence the layout and character of development parcels • Add - New streets MUST be tree lined to assist carbon reduction and complement existing character 	<p>Throughout development of the masterplan and design code documents, careful consideration has been given to the choice of wording and the implications this may have. The Calderdale Local Plan is ultimately the policy framework upon which these documents are based, any planning application will therefore need to be in conformity with these policies - it cannot go further or introduce policy or reduce the flexibility that a policy often provides. A delicate balance must be achieved in providing supplementary guidance and avoiding producing a rigid set of parameters that results in an unusable document that could in turn stymie delivery of the Garden Community.</p>

	<ul style="list-style-type: none"> • We support Bradley Wood Ancient Woodland buffer. The regulatory plan shows a substantial buffer. However it should be verified that this is a minimum and subject to the topography (this is the steepest sloping land on the site down to the Bradley Park Dyke) and impact on the dyke and ancient woodland. 	
	<ul style="list-style-type: none"> • Request the Wildlife Habitat Network is changed to MUST be protected and enhanced in accordance with Local Plan Policy GN2 which does NOT allow development in a Wildlife Habitat Network if it would “damage the physical continuity of the Network; or impair the functioning of the Network by preventing movement of species; or harm the nature conservation value of the Network”. 	All planning applications will be assessed against Policy GN3 – Natural Environment in the Calderdale Local Plan
	<p>Opportunities to create links between Networks should be developed but we can see no attempt to do this. This is especially needed where the new park is proposed and at the interface with Bradley Woods.</p> <p>Opportunity exists to develop and establish a joint working approach with Kirklees Council and local conservation groups in both local authorities to consider the Kirklees and Calderdale Wildlife Habitat Networks comprehensively (rather than in isolation as per the current practice) along and across the Bradley Wood boundary to deliver more effective management and added benefits to this invaluable wildlife resource. We request this is added.</p> <ul style="list-style-type: none"> • The Coal Authority confirmed in their response to the EIA Scoping Opinion that the proposed development site falls partly within the defined Development High Risk Area (DHRA) due to the presence of the recorded mine entry (shaft, CA ref. 415421-001) and its associated zone of influence/instability. An indicative location of the mine shaft is shown on page 14. This is contrary to what the SPD document says. Furthermore, they 	Agreed. Wildlife Habitat Networks in both Calderdale and Kirklees will be fully considered in a joined-up approach.

	<p>confirm that any form of development over or within the influencing distance of a mine entry can be dangerous, raises significant safety and engineering risks and exposes all parties to potential financial liabilities. As a general precautionary principle, their adopted policy is to avoid wherever possible the building over or within the influencing distance of a mine entry. This needs to be clarified and added to the constraints.</p>	
	<p>Firth House Farm listed hamlet – mitigations from Heritage Impact Assessment (HIA) MUST be required. Please explain why the zone of visual impact shown on the constraints map is significantly less than that shown on the HIA. The extract below shows the true extent and also includes Firth House Lane which is important to the setting. How on earth have you got to what is shown on the constraints from this? This shows an unbelievable disrespect of our historic assets. This does not reflect the requirements of the Heritage Impact Assessment (HIA) and the constraint MUST be properly reflected.</p> <p><i>[Extract of HIA]</i></p> <ul style="list-style-type: none"> • Agree there needs to be adequate treatment of the boundary against existing dwellings and this is most likely best achieved from a rich planting buffer. • There are Landfill sites adjacent to the site and where the access from Woodhouse Gardens is proposed as shown on the plan below. These MUST be referenced as constraints with an explanation of the required mitigations. <p><i>[Landfill site locations]</i></p>	<p>The Council's Conservation Team have been consulted throughout the Local Plan process, in the production of this SPD and will be on submission of phased planning applications (along with Historic England).</p> <p>The Conservation Officer was involved in development of the masterplan and specific projects such as the production of the character appraisal and crucially how this appraisal, along with other evidence bases such as the Heritage Impact Assessment, informed the detailed design code.</p> <p>As referenced, the Heritage Impact Assessment (HIA) was undertaken to support the Local Plan allocation and applications should implement the recommendations provided in the HIA or other suitable mitigation measures agreed by the Local Planning Authority to avoid or minimise the impact on the significance of heritage assets and their setting. While several parcels of development do encroach into the area of high sensitivity highlighted in the HIA, it is considered that other suitable measures are possible which would avoid or minimise the impact on the significance of the heritage assets and their setting.</p> <p>Subsequently, and in consultation with the Conservation Team, the masterplanners identified a landscape set-back from Firth House (including a community orchard) and a defined view corridor from the west as a response to the HIA. In addition, it</p>

		<p>was agreed that development parcels M1, M2 and M3 should have a distinct character with homes having a rural or 'farmstead' feel with an informal arrangement of lanes and courtyards (as set out in the Firth House Farmsteads Character Area on pages 95/96 of the Design Code).</p> <p>Further detail will be provided at phased planning application stage, where there will also be a requirement for a phase specific HIA.</p>
	<p>The following plan is provided to demonstrate the line of a potential 250m health and safety buffer that is a constraint on the Kirklees landfill site that impacts on the deliverable area of the garden community.</p> <p><i>[Health and safety buffers required for large infill site]</i></p> <p>The required zone of stand-off for the Kirklees landfill site needs to be reflected in the masterplan development/layout and there needs to be adequate mitigations</p> <p>Detailed information provided in the planning application documents for the Woodhouse Gardens development (96/00103/LAO and 96/02193/FUL) indicate that landfill at the proposed access point into the Woodhouse site also presents a constraint on the Woodhouse Garden Community proposals and open space.</p>	<p>The Coal Authority have been consulted and welcome the notification within the Masterplan document that a Coal Mining Risk Assessment will be required, as set out in Appendix 2 - Validation Requirements of the Draft Woodhouse Garden Community Masterplan SPD. When plot R9, or any part of the site which falls within the defined Development High Risk Area, is being considered a Coal Mining Risk Assessment should be submitted to support any planning application for the development proposal.</p>
	<p>The Environment Agency identified methane levels in excess of trigger levels. Recommended remediation was to screen or remove the material on this site. However due to the nature of the fill and the competent nature of the bedrock beneath both these options were unviable so the material remains. To allow the safe development of Woodhouse Gardens development, a gas venting trench was required around the un-remediated fill (Type 1 fill area as shown below) with no houses to be built within 10m of the trench.</p>	<p>The Environment Agency have been consulted in the development of the draft SPD (and throughout the masterplanning process) and have provided extensive comments and proposed modifications.</p> <p>The Environment Agency will also be consulted at phased planning application stage.</p>

	<p>The proposed future access point onto Woodhouse Gardens in the masterplan would need to cut across this un-remediated landfill area and through the venting trench. Further investigation is required to establish both the feasibility and viability of an access from this part of the site and the costs that need to be included in the viability assessment if this access is to go ahead.</p> <p>No reference is made to the historical archaeological assets on the site and adjacent.</p> <p>A medieval settlement at Firth House Farm (WYAAS Ref: MWY1916 – referenced on the HIA) potentially exists and further evidence of settlement has recently been identified on the proposed school site. Evidence on the school site has been verified since the Local Plan Inquiry (see attached HER sheet – appendix 1). This was confirmed by Rhona Finlayson (WY Advisory Archaeological Service) in 2022</p> <p><i>“I have checked the HER database for this and we already have a record indicating possible medieval settlement near to Firth House Farm. The pattern of small fields and a possible field barn is shown on the 1st edition 6 inch series Ordnance Survey Map, c 1854 and I have enhanced the existing HER record with your information as the cropmarks you have noticed on Google Earth show smaller enclosures which may represent settlement”.</i></p>	<p>Required mitigations will be informed by the more detailed survey work and will be conditioned on approval of planning applications.</p>
	<p>A Haha also exists along the northern boundary of the cricket pitch and abutting the site. Plan attached from WYAAS at appendix 2 showing this.</p> <p>We request that developers must submit an appropriate desk-based assessment and, where necessary, a field evaluation in liaison with WYAAS on these matters.</p>	<p>The Council's Conservation Team and Historic England have been consulted throughout the Local Plan process, in the formation of this SPD and will also be on submission of phased planning applications. Historic England have welcomed the inclusion of the validation requirement to prepare a site-specific Heritage Statement or Heritage Impact Assessment (as appropriate) and Archaeological Appraisal.</p>

	<ul style="list-style-type: none"> • We repeat non-designated heritage assets at Upper Woodhouse are not shown and should be referenced/considered 	<p>It is understood that the HaHa was associated with Woodhouse Hall, being a garden feature of the later 19th century. Further research will be required regarding the extent of the feature, however it is likely to be considered to be a non-designated heritage asset, therefore forthcoming applications will be assessed against Policy HE1 – Historic Environment of the Calderdale Local Plan.</p> <p>The Council's Conservation Team and Historic England have been consulted throughout the Local Plan process, in the formation of this SPD and will also be on submission of phased planning applications. Historic England have welcomed the inclusion of the validation requirement to prepare a site-specific Heritage Statement or Heritage Impact Assessment (as appropriate) and Archaeological Appraisal which will inform the development proposals</p>
	<p>The regional Bradley Wood Scout Camp is based in Bradley Woods within Kirklees boundary. There is heavily restricted public access through the site due to safeguarding concerns. Shepherds Thorn Lane is the main access to the scout camp which attracts significant traffic movements into and out of the facility. This is especially the case when events take place and vehicles spill out to park along the length of the lane. The proposals, and specifically those to close the lane access, need to reflect the operation of the scout camp and a local arboriculture business located in the woods. Has the Scout HQ been consulted for their input to ensure access, safeguarding and effective operation are fully considered?</p>	<p>The access to existing properties on Shepherds Thorn Lane including the scout camp has been considered and discussed by the highway authority and communicated to the developers. Vehicular access will be maintained with any future changes to the road network.</p>
	<ul style="list-style-type: none"> • Groundwater surface flooding is an issue on a large part of the site and this has not been referenced or mitigations identified. This already results in flooding issues for some properties around the periphery at Ryecroft lane. The Environment Agency maps provided on the Clifton EZ planning 	<p>Groundwater flood risk will need to be identified and mitigated against by the applicants Flood Risk Assessment and then reviewed and accepted, if appropriate, by the LLFA.</p>

	<p>application identify the ground water flooding risk to this area as shown below.</p> <p><i>[Flooding needs to be identified as a constraint on development]</i></p>	
	<p>No reference is made to the sewer which passes through the site, from Woodhouse Gardens to Anchor Pit which is a constraint and will require development stand-off or diversion. Plans below show the route. The line also seems to be visible on the plan on page 14 but there is no reference to this.</p>	<p>Appendix 2 - Validation Requirements of the Draft Woodhouse Garden Community Masterplan SPD confirms that a drainage strategy will be submitted with phased applications (Surface Water and Foul Drainage Assessments)</p>
	<ul style="list-style-type: none"> • Protected habitat constraints exist on the site which impact on the masterplan and layout. There is a significant bat population on the site. Lighting MUST be designed to protect commuting routes and avoid disturbance. Generally, these follow the lines of existing hedgerows in and around the site. Similarly, badgers need to be protected and developer MUST be required to contact the Calderdale and Kirklees Badger Protection Groups for local records to ensure adequate protection. 	<p>The subject of lighting is considered in the draft Design Code SPD at section 4.6.16. Lighting will also be considered at the planning application stage</p>
	<ul style="list-style-type: none"> • In accordance with the WYAAS Landscape Character Assessment 2017:- <ul style="list-style-type: none"> o existing historic boundaries and associated features should be retained and actively maintained; o relict field boundaries should be restored or reinstated to enhance the legibility of historic landscapes; and o the layouts of any new development should be designed so that the lines of key field boundaries are retained within the landscape, either as routeways or as modern property boundaries . <p>It is unclear how this has been achieved.</p>	<p>See above comments regarding consultation with the Council's Conservation Team and Historic England.</p> <p>All phased planning applications will be assessed against adopted policies in the Local Plan, including Policy HE1 – Historic Environment.</p>

	<p>PAGE 17 - 22</p> <p>UNDERSTANDING LOCAL CHARACTER</p> <p>The local character of Woodhouse needs to be reconsidered as the document does not accurately capture this. The example photos are not from Woodhouse with the exception of one. The Woodhouse area (within Rastrick) is characterised by low density, semidetached and larger dwellings set in large gardens. There are small number of terrace properties interspersed related to historical settlements at Lower and Upper Woodhouse. The main streets appear as green avenues with grassed verges and are lined with regular trees. Example photos included in the Woodhouse Draft SPD's appear to be from Brighouse/Thornhill which is a different character area. This needs to be changed to reflect the uniqueness of the Woodhouse area. This seems at odds with the higher densities proposed on the site which you have put abutting the existing Woodhouse area to create an incongruous interface. The development has also been sold on the basis of a garden community with lower densities. We request the densities reflect the existing development and that higher density is set back into the site. This is in accordance with page 89 where you state with regard to the Woodhouse Centre character area that, “The area forms a transition from the sensitive boundary with existing homes in Woodhouse to the more urban heart of the community around the school and local centre”.</p> <p>The site needs to remain low density throughout to meet the garden community credentials and the 28dwelling/hectare promised.</p> <p>The assessment also fails to reflect the landscape character work undertaken by WYAAS as outlined in previous comment.</p>	<p>Please note that the indicative developable area used to calculate the density in the Local Plan was based on constraints such as heritage and ecology. It did not take account of the land required for non-residential uses, such as education, the local centre and open space.</p> <p>The approach to density is outlined in paragraphs 4.3.4 and 4.3.5 of the Draft Woodhouse Garden Community Masterplan SPD</p> <p>Please see below response to comments regarding pages 89/90 of the document regarding the approach to local distinctiveness and responding to character and arrangement of existing buildings.</p> <p>Appendix 2 - Validation Requirements of the Draft Woodhouse Garden Community Masterplan SPD indicates a requirement for a Landscape and Visual Impact Assessment to be submitted as part of a phased planning application. The wording of section 4.3.3 will be strengthened to ensure clarity.</p>
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	<p>Again, the plan does not show the Kirklees Garden Community and part loss of golf course. It is inappropriate to view the masterplan in isolation when these are two adjacent garden communities separated by Bradley Woods. Consideration of the linkages needs to be considered. We have been promised an overarching M62 Corridor Garden Community Masterplan to ensure the significant, cumulative growth is effectively planned and managed but this has never materialised. The masterplan needs to reflect the wider growth proposals otherwise this is very poor attempt at urban planning and we can all see where that is going to end.</p>	<p>As noted under point 107 – agree to change the proposed employment areas shown in Kirklees on Site Opportunities plan to residential in line with Bradley Park housing development.</p>
	<p>Page 22</p> <p>Development is largely of stone construction from 1919 onwards abutting the garden community site. As development has progressed eastwards towards the A641 and northwards, materials do change to brick construction. The predominance of stone use adjacent to the site and within the site at historic farmsteads needs to be retained within any development proposals.</p>	<p>Noted.</p>
	<p>Page 25</p> <p>REGULATORY PLAN</p> <p>This appears to provide the controls that planning applicants will need to adhere to. It is confusing and not clear how all the parts of the masterplan fit together or how these relate to the constraints.</p> <p>The plan MUST be shown on one page, not split, so that it can be seen properly.</p> <p>In terms of the specific regulations shown we make the following comments:-</p> <ul style="list-style-type: none"> - colour of parks/ gardens and green links cannot be differentiated 	<p>Issue dependent on viewing /printing options on individual computer programmes.</p> <p>This comment refers specifically to the Regulatory Plan on page 25/26 as the Appendix 2 - Validation Requirements of the Draft Woodhouse Garden Community Masterplan SPD on page 7/8 does not make reference to 'green links'. It is agreed that the difference between these different uses is not entirely clear.</p> <p>Agree to amend colours to create greater clarity between the different categories of greenspace.</p>

	<p>It is unclear how the building form/layout works at the entrance to the site and behind 5-9 Ryecroft Lane. There is planting shown along the rear boundary of 5-9 Ryecroft Lane - what is this? How do the key building work – this is not clear?</p> <p>- Different plans show the secondary community hub in two different locations – one is outside the cricket pitch, the other, on a residential parcel on the plan at page 29, is on it. Which is it?</p> <p>If the secondary community hub is located on the cricket ground it will displace the cricket ground to the east and onto sloping land which does not seem feasible. The Cricket Club needs to be consulted to advise on what they require/is suitable. Has this been done?</p>	<p>This level of detail will be provided at phased planning application stage. There are numerous references throughout the SPD (and Local Plan more generally) to ensure the existing dwellings on surrounding streets are carefully considered.</p> <p>The Plan on page 29 of the Design Code is incorrect and will be corrected to match the masterplan. Update the plan on page 29 to match the masterplan.</p> <p>As proposals develop, they will involve consultation with the cricket club and Sport England who have for example requested the need for a ball strike assessment.</p>
	<p>The secondary access also crosses the cricket pitch site and through the Haha. How does this impact on the Haha? How will health and safety requirements be met in terms of cricket balls encroaching onto the access route?</p>	<p>It is understood that the HaHa was associated with Woodhouse Hall, being a garden feature of the later 19th century. Further research will be required regarding the extent of the feature, however it is likely to be considered to be a non-designated heritage asset, therefore forthcoming applications will be assessed against Policy HE1 – Historic Environment of the Calderdale Local Plan.</p> <p>The Council's Conservation Team and Historic England have been consulted throughout the Local Plan process, in the formation of this SPD and will also be on submission of phased planning applications. Historic England have welcomed the inclusion of the validation requirement to prepare a site-specific Heritage Statement or Heritage Impact Assessment (as appropriate) and Archaeological Appraisal which will inform the development proposals.</p>

		As proposals develop, they will involve consultation with the cricket club and Sport England who have for example requested the need for a ball strike assessment.
	Need to be clearer on affordable housing integration. This must be tenure blind and fully integrated. Failure to do this could create ghetto type issues	Affordable homes should be integrated into the development. However, homes for affordable or social rent managed by a Registered Provider should be clustered in groups of up to 10 to aid their management.
	The School is 2 storey. This is on the high point of the site which will have an impact on townscape, the listed Firth House Farm and extensive views from the east. How does this conform to the requirements of the HIA? This needs to be carefully considered in the design to ensure impact is minimised and the setting and rural character of the listed farm buildings are protected. As before, the impact on any archaeological remains needs to be assessed and catalogued.	<p>The Council's Conservation Team and Historic England have been consulted throughout the Local Plan process, in the formation of this SPD and will also be on submission of phased planning applications. Historic England have welcomed the inclusion of the validation requirement to prepare a site-specific Heritage Statement or Heritage Impact Assessment (as appropriate) and Archaeological Appraisal which will inform the development proposals for the primary school.</p> <p>Appendix 2 - Validation Requirements of the Draft Woodhouse Garden Community Masterplan SPD indicates a requirement for a Landscape and Visual Impact Assessment to be submitted as part of a phased planning application. The wording of section 4.3.3 will be strengthened to ensure clarity.</p>
	It mentions PROW but it is difficult to see where these are on the plan	Noted and responded to above.
	How have the components of the local centre been identified? What demand/needs assessment has been undertaken reflecting existing provision? Who has been consulted on this?	Discussion with landowners and developers, including looking at market demand and other successful examples across the UK based on experience of masterplanning team.
	<p>Have the cricket club been consulted on the new pavilion proposals and its location?</p> <p>Are the sport facilities in the primary school available for all or just the school use? This needs to be made clear especially in relation to the open space requirements for the site and meeting these.</p>	As proposals develop, they will involve consultation with the cricket club and Sport England who have for example requested the need for a ball strike assessment.

	<p>Page 33</p> <p>It states public realm must be considered as a unified whole. How will this be achieved with your ad hoc planning application approach. Further design guidance on this is required.</p>	<p>All facilities including the public open spaces, play areas, pitches, community centre and associated activities will be open to all residents, both new and existing.</p> <p>Advice contained within the SPDs and the Local Plan policy framework will ensure that the public realm is considered as a unified whole.</p>
	<p>Page 34</p> <p>Community growing proposal along the side of the Bradley Park dyke does not look feasible due to the steep topography. This is an exceedingly steep embankment. See the contours on the map at page 14.</p> <p>We support productive landscapes but these need to be in right places. The impact on the adjacent wildlife habitat networks (Calderdale and Kirklees), Bradley Park Dyke watercourse and ancient woodland needs to be assessed especially in relation to encroachment, invasive species, fragmentation etc as outlined previously. How will this be controlled?</p> <p>What is meant by an arrival space?</p>	<p>The impact of this proposal on the Wildlife Habitat Network and ancient woodland needs to be considered.</p> <p>Maintaining the ecological functioning of the Wildlife Habitat Network will be considered at the planning application stage.</p> <p>Arrival spaces indicate key gateway routes into the site.</p> <p>Reference is made to the area of Council owned land to the north of the existing cricket club. Proposals for the secondary access may include enhancements to this land.</p>
	<p>Page 35</p> <p>How will the parks and gardens be integrated? This is the first time this is mentioned.</p> <p>Noting the requirement of delivering 10% additional Biodiversity Net Gain (BNG) over and above that lost to the development proposed, how is this to be achieved in an area formally designated as green belt? What strategies are in place to provide the equivalent categorised habitat and necessary green space within the area or neighbouring the proposed development?</p>	<p>The Biodiversity Net Gain assessment will quantify the baseline value of the pre-development habitats, including those of low botanical interest, and ensure that the development results in a Biodiversity Net Gain of at least 10%.</p> <p>While the Local Plan and SPD provide the necessary framework, the detail referenced will be required at phased application stage.</p>

	<p>We note the importance placed within the document on BNG and climate resilience, surely these must be in place before any submission is made for the development of parcels of land.</p> <p>The document fails to adequately deal with the issue of BNG and this needs to be equalised across the site. Failure to do so will place undue costs on the latter phases of the site and risk delivery.</p>	
	<p>The Park and Cricket Ground Framework Plan is suddenly presented with no associated context or assessment – until now it has always been outside the site. Where is the assessment of impact on the Wildlife Habitat Network to verify the road, active travel routes and uses will not have a negative impact on this?</p> <p>Where are the existing trees (some of which are veteran/notable and house bat roosts)? The key colours do not appear to show them. Some tree cover is missed along the western boundary of the cricket pitch and around to where the access exits. No attempt at buffering is provided. Trees and hedges need to have the required 15m buffering for protection.</p>	<p>The impact of this proposal on the Wildlife Habitat Network will be considered. Maintaining the ecological functioning of the Wildlife Habitat Network will be considered at the planning application stage in accordance with adopted policy in the Local Plan.</p> <p>Phased applications will be assessed against guidance in the NPPF relating to veteran and notable trees along with policy guidance in chapter 23 of the Local Plan – Green Infrastructure and Natural Environment, specifically Policy GN5 – Trees.</p> <p>As stated in Appendix 2 - Validation Requirements of the Draft Woodhouse Garden Community Masterplan SPD, a Tree Survey will be required on submission of phased planning applications as well as Ecological Surveys and Reports. The Tree Survey will recommend buffers as part of other mitigations where necessary.</p>
	<p>As above, the cricket circle has been moved.</p> <p>The HaHa must be protected. The historic asset and its extent are not shown. The access cuts through this and also impacts on mature trees as it exits the southern boundary. What impact does the car park have on the Haha? Has WYAAS been consulted?</p>	<p>It is understood that the HaHa was associated with Woodhouse Hall, being a garden feature of the later 19th century. Further research will be required regarding the extent of the feature, however it is likely to be considered to be a non-designated heritage asset, therefore forthcoming applications will be assessed against Policy HE1 – Historic Environment of the Calderdale Local Plan.</p>

		<p>The Council's Conservation Team and Historic England have been consulted throughout the Local Plan process, in the formation of this SPD and will also be on submission of phased planning applications. Historic England have welcomed the inclusion of the validation requirement to prepare a site-specific Heritage Statement or Heritage Impact Assessment (as appropriate) and Archaeological Appraisal which will inform the development proposals.</p>
	<p>Has the contamination at Woodhouse Garden access been considered in relation to public open space and health and safety. What is the impact of the road access on trenching to protect the residents of Woodhouse Gardens.</p>	<p>The Environment Agency have been consulted in the development of the draft SPD (and throughout the masterplanning process) and have provided extensive comments and proposed modifications.</p> <p>The Environment Agency will also be consulted at phased planning application stage. Required mitigations will be informed by the more detailed survey work and will be conditioned on approval of planning applications.</p> <p>A Land Contamination Assessment will be required as a validation requirement.</p>
	<p>Veteran/notable trees must be retained and protected with adequate buffers – 15m.</p>	<p>See above response on veteran and notable tree assessment.</p>
	<p>Pages 37</p> <p>Play space provision and a strategy needs to be provided in accordance with the Open space and Play SPD and provide the correct amount.</p> <p>Have this been applied in line with the Fields In Trust Guidance for Outdoor Sport and Play: Beyond the Six Acre Standard? This needs to be confirmed. What is the hierarchy of these spaces?</p>	<p>As highlighted in Appendix 1 – Site Number LP1451 – Land between Bradley Wood and Woodhouse Lane, Rastrick of the Local Plan, provision of Open Space on the allocation will be above policy requirements. The specific breakdown of phase-by-phase typology requirements, and total provision, is indicated in the Development Guidelines section of the SPD.</p> <p>Specific detail of provision (within each typology) will be in accordance with the guidance provided in the SPDs and determined at the time of each phased application in consultation with the Council's Open Space Team.</p>

	<p>This is supposed to be a garden community, it is NOT appropriate that there are already deficiencies in provision which will generate traffic movements.</p>	<p>The Council's Open Space Team will provide advice on phased applications based on up to date, relevant guidance available at the time of submission.</p>
	<p>Page 38</p> <p>The community orchards do not appear to be in the best locations for accessibility but rather areas not suited for house building. Providing such a space adjacent to the listed building would not be in keeping with the listed building and curtilage. Providing an orchard to the east on the steep slope shaded by the existing ancient woodland would also not be the best site. Again, there is the question of whether these are the best locations for these important elements, or are they just crowbarred into otherwise unused land to make it appear to be a garden community?</p>	<p>The Council's Conservation Team and Historic England have been consulted throughout the Local Plan process, in the formation of this SPD and will also be on submission of phased planning applications. Historic England have welcomed the inclusion of the validation requirement to prepare a site-specific Heritage Statement or Heritage Impact Assessment (as appropriate) and Archaeological Appraisal.</p>
	<p>Page 39</p> <p>What is the play strategy for the Garden Community? There does not appear to be one and nothing to confirm how this will be delivered across the whole site by a range of different land owners. You have just provided a loose description of what each type of play space is but these are not translated onto the plan. If the SPD is the controlling policy /framework document and there is to be no site wide outline planning approval to set the parameters, it needs to be set out here along with how its delivery, the equalisation and maintenance will be achieved. This is flimsy.</p>	<p>As SPDs do not form part of the development plan, they cannot introduce new planning policies into the development plan.</p> <p>Place space will be developed in accordance with the guidance in the design code document.</p> <p>Careful consideration has been given to the choice of wording and the implications this may have. The Calderdale Local Plan is ultimately the policy framework upon which these documents are based, any planning application will therefore need to be in conformity with these policies - it cannot go further or introduce policy or reduce the flexibility that a policy often provides. A delicate balance must be achieved in providing supplementary guidance and avoiding producing a rigid set of parameters that results in an unusable document that could in turn stymie delivery of the Garden Community and innovative design.</p> <p>See chapter 7 (Stewardship) for maintenance arrangements.</p>

	<p>Page 41</p> <p>It will be mandatory to provide SUDs on all new developments from next year. This should be shown as ‘MUST’ not, where possible.</p> <p>We request a whole site drainage strategy for the site to show how drainage will be managed across the whole. This should include information on the catchments across the site. It is not acceptable to consider this on a phase by phase basis. The whole point of the equalisation and collaboration agreement is to iron out these things first. The masterplan fails to consider these critical and important strategic, site wide elements of the garden community.</p> <p>The current topography of the site would indicate that the surface water flows will fall from southwest to northeast but with a crossfall to the north which will impact on the existing properties to the north if not addressed.</p> <p>Due to the density of housing proposed in these areas there does not appear to be sufficient space to mitigate the surface water flows through attenuation or SUDS. Has this been verified?</p> <p>Given the initial parcels and phases are located in this area, they will have to deal with the flows from across the site which collect in this area until the later phases are developed.</p> <p>Where will the outfalls from the site connect with the existing infrastructure given the topography of the site and the railway being between the site and the River Calder?</p> <p>Please note the site has two aquifers and clay soil with associated surface water issues. Therefore, it's unclear whether SUDs will be appropriate. What assessment of this has been made to verify SUDs use? The site quickly becomes</p>	<p>The Flooding and Water Resource Management chapter of the Local Plan provides the policy framework. Specifically, Policy CC3 - Water Resource Management refers to the use of sustainable urban drainage systems. Any planning application will therefore need to be in conformity with these policies - it cannot go further or introduce policy.</p> <p>Phased applications will be accompanied by a Drainage Strategy (Surface Water and Foul Drainage Assessment). The Council's Drainage Team and the Environment Agency have been consulted as part of the SPD consultation process and will be as phased applications are submitted.</p> <p>Throughout the Local Plan process and development of the SPDs, the Council regularly met with representatives of all the relevant statutory organisations / providers and shared details of the scale, timing and distribution of growth proposed within Calderdale. Parties found regular sharing of information to be helpful including as part of their own asset management, systems and investment planning programmes.</p> <p>The majority of the site drains towards the east/southeast, towards Bradley Park Dike which runs along the southern boundary. The northern and western parts of the site do fall towards the existing houses. The drainage will be designed to manage runoff from this area and direct it to the proposed site SW drainage system. In consultation with the drainage strategy consultants, flows will not be directed to existing properties.</p> <p>The Drainage Strategy will be developed with the parcels of land in mind, so that surface water from each parcel will be collected, and sufficient storage for the design flood event (plus</p>
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	<p>waterlogged after prolonged or heavy rainfall. This is especially the case around the Ryecroft Lane entrance. This also results in the flooding of cellars at 5 to 9 Ryecroft Lane. This issue needs to be addressed in any development proposals and mitigations must be required to ensure protection of the properties and run off to other properties. Number 5 is in the ownership of landowner - Thornhill Estates.</p>	<p>an allowance for climate change and urban creep) provided, in agreement with the DS consultant.</p> <p>Discussions with the Drainage Strategy consultant highlighted the phased approach and drainage connections and outfalls will be provided to link initial phases to the ultimate outfall, this was highlighted to be Bradley Park Dike to the east of the site, which drains into the River Calder.</p> <p>The LLFA are awaiting the finalised Drainage Strategy for the whole site however initial talks with the consultant have been productive and are expected to be in line with the comments raised. The whole site drainage will be addressed before any individual detailed site drainage plan.</p> <p>The Drainage Strategy needs to be accompanied by appropriate ground investigation surveys and percolation testing to assess the current ground conditions and the viability of SuDS for the site. Basement dwellings are not proposed due to the inherent risk of groundwater flooding.</p>
	<p>Page 42</p> <p>As before, given the requirement of delivering 10% additional Biodiversity Net Gain (BNG) over and above that lost to the development proposed, how is this to be achieved in an area formally designated as green belt? What strategies are in place to provide the equivalent categorised habitat and necessary green space within the area or neighbouring the proposed development?</p> <p>We note the importance placed within the document on BNG and climate resilience, surely these must be in place to inform the equalisation and before any submission is made for the development of parcels of land?</p> <p>Given this is supposed to be a Garden community a positive BNG MUST be delivered on site. You have sold</p>	<p>The Environment Act 2021 amends the Town and Country Planning Act 1990. It sets out that the majority of developments will be legally required to demonstrate a minimum net gain of 10% and secure those gains for a minimum of 30 years. The requirement to demonstrate net gains applies to all habitats within the red line, regardless of whether they are impacted or not.</p> <p>Wildlife Habitat Networks in both Calderdale and Kirklees will be fully considered in a joined-up approach.</p>

	<p>the garden communities on their green and ecological benefits.</p> <p>As before the linkages beyond the site must be fully considered through the masterplan in line with a BNG. This seems to be ignored.</p>	
	<p>Page 47</p> <p>Again with movement, the development does not stop at the boundary of the Garden Community.</p> <p>What about footways and junction issues outside the site that are substandard ie from Ryecroft onto Woodhouse Lane both ways. Reference needs to be made that this will need to be addressed through the planning process via Section 106.</p>	<p>Chapter 5 of the Design Code SPDs provide detailed information on the access and movement strategy that will underpin delivery of the allocation, including key design principles and high-level specifications. Appendix 1 of the Draft Woodhouse Garden Community Masterplan SPD provide an indication of the probable s106 requirements for phased applications and include reference to off-site highway improvements and active travel connections beyond the red edge of the application.</p> <p>Appendix 2 - Validation Requirements of the Draft Woodhouse Garden Community Masterplan SPD include reference to a requirement for Travel Plans which will detail the long-term management strategies for integrating proposals for sustainable travel into the planning process. Plans will be based on evidence of the anticipated transport impacts of development and establish measures to promote and encourage sustainable travel within the site boundary and beyond.</p> <p>In addition, existing Rights of Way are identified as site opportunities in the documents and are highlighted as providing key connections between the existing residential areas and the countryside beyond. These must be considered and incorporated within phased development proposals.</p>
	<p>Page 48</p>	<p>See previous responses.</p>

	How does the closure of Shepherds Thorn Lane work in relation to access to Bradley Wood Scout Camp? See previous comments.	
	<p>Page 49</p> <p>There is no assessment of frequency of existing bus routes or where they go. Without this it is unclear what provision is available. This needs to be clear.</p> <p>Who will instigate the bus service? Which parcels of land for development would trigger the need for this?</p> <p>The proposed routes are outlined but then later in the documents it states these are not feasible. How are you creating a sustainable community? This is all very confusing and unclear.</p>	<p>The developers have been advised of the need to fund increased bus service provision.</p> <p>Discussions have been ongoing with the West Yorkshire Combined Authority and Transportation colleagues regarding the mechanism to achieve the improved service.</p>
	<p>Page 53</p> <p>This indicates the secondary streets will not have bus access. This contradicts the bus route shown on Page 49 which shows a minibus route on secondary streets – Ryecroft and Woodhouse Gardens. Which is correct? Information suggests this is NOT feasible.</p> <p>Who will instigate the bus service? Which parcels of land for development would trigger the need for this?</p>	<p>A potential mini-bus route is proposed along the secondary streets as shown on page 49. Page 53 to be amended to reflect this.</p> <p>Para 5.7.9 of the Draft Woodhouse Garden Community Masterplan SPD states that “An extended or modified E1 [mini-bus] service would be acceptable as an interim solution for initial phases close to the existing dwellings.</p>
	<p>We agree we should be adopting the Manual for Streets 2 (MfS2) approach.</p> <p>How is the issue of network connections to secondary streets that do not meet these requirements dealt with eg. Ryecroft Lane. What assessment of health and safety has been made on the existing road network? We can find no assessment which is contrary to the requirements of Policy IM7.</p> <p>The SPD does not seem to address the wider issue of how active routes link into the existing travel infrastructure and</p>	<p>During the Local Plan Examination process, the Local Highway Authority indicated that, in principle, the site is capable of being safely accessed and that related off-site highway mitigation measures could be achieved. Initial masterplans showed the main access would be provided via the A641 with secondary accesses off Ryecroft Lane and Woodhouse Gardens.</p> <p>The Planning Inspector noted that future Transport Assessment work associated with phased planning applications will provide an opportunity to explore access and mitigation measures in</p>

	<p>whether people would be willing to negotiate this once out of the garden community.</p>	<p>more detail. The Inspector was however satisfied that safe access to the site is capable of being achieved and that in order to be effective Appendix A should be amended to refer to the provision of main and secondary vehicular access points.</p> <p>Environmental Health will be consulted regarding access arrangements on phased applications.</p>
	<p>Page 65 /76</p> <p>Woodhouse Garden Community is outside walking distances of Brighthouse Town Centre and in addition the footpaths outside the site are substandard. How are these connections going to be addressed?</p>	<p>See above response regarding movement outside the allocation boundary, Section 106 funding and Travel Plans.</p>
	<p>It looks like the active routes outside the site rely on the A641 Corridor Investment Programme being implemented. This has gone very quiet – what is the timeline for delivery? If phase 1 is implemented next year as the document states how will the active routes be achieved. If these are not in place it is a well-known fact that car use will become entrenched. What mitigation is in place should the A641 project not be implemented?</p> <p>Are the PROW subsumed into the access roads in part – this is not clear?</p> <p>We agree cars should not dominate the streetscape and adequate in curtilage provision should be provided.</p> <p>Cycling parking provision looks acceptable although given the distance and topography how far this will be used remains to be seen. How realistic is this?</p> <p>We agree with the waste and recycling principles.</p>	<p>This comment is outside the scope of this consultation.</p>
	<p>Page 79</p> <p>Density is significantly more than the Local Plan proposal (appendix 1 confirms this was 28 dwellings/hectare). The</p>	<p>The indicative developable area used to calculate the density was based on constraints such as heritage and ecology. It did not take account of the land required for non-residential uses, such as education, the local centre and open space.</p>

	<p>garden communities have been promoted as low density communities set in green space. This has already been watered down. Please explain what the rationale is to increase this to 30-40 plus dwellings/hectare? You mention Policy HS2 but this relates to non-allocated sites. The allocated sites in the local plan were discussed at length and densities confirmed in your plan that was adopted only a few months ago. How can there be such a dramatic change in such a short space of time?</p> <p>It is not acceptable if this density increase is because of site constraints that we raised but that you consistently argued were fine to the Inspector at the hearings.</p>	<p>Appendix 1 – Site Number LP1451 – Land between Bradley Wood and Woodhouse Lane, Rastrick of the Local Plan is clear that the densities and capacities area indicative and may be subject to changes based on the evidence provided at the planning application stage and when actual development schemes are drawn up.</p>
	<p>We object to the highest densities being placed up against the existing Woodhouse development. We request the highest densities are located away from existing development in order to protect designated and un-designated heritage assets, in addition to the privacy, amenity and lifestyle of existing woodhouse residents.</p> <p>We request that building heights adjacent to the existing properties MUST be no more than 2 storey to protect the residential amenity, privacy and lifestyle of existing residential properties.</p>	<p>Section 4.3 of the document outlines the approach to building heights. Drawing strongly from local character, the majority of homes within the Garden Community will be 2 - 2.5 storeys high, also helping to reduce the site's visual prominence within the surrounding landscape. Some areas of the site which are flatter or less visible from a distance may have the potential for buildings up to 3 storeys in height, but these should be focussed within areas of higher density, a more urban character, or where an increased sense of enclosure is beneficial - for instance along the Primary Street or alongside open spaces.</p> <p>Dwellings above 2 storeys may be appropriate subject to design rationale. The code is clear that the area will predominantly comprise of 2 storey dwellings.</p> <p>Appendix 2 - Validation Requirements of the Draft Woodhouse Garden Community Masterplan SPD indicates a requirement for a Landscape and Visual Impact Assessment to be submitted as part of a phased planning application. The wording of section 4.3.3 will be strengthened to ensure clarity.</p>
	CHARACTER AREAS	<p>The Council agrees to the suggested naming modification.</p>

	<p>P89/90 Woodhouse Centre Area</p> <p>Why is this called the 'centre' area. It isn't and this is misleading. The centre revolves around the school and the adjacent part of Phase 2. This needs to be retitled. We suggest this should be Upper Woodhouse character area to reflect the historic character of the settlement around Ryecroft Lane.</p>	
	<p>This character area fails to reflect the presence of the old Upper Woodhouse settlement which as we have shown is still visible. A more informal layout is required around the older Upper Woodhouse settlement to reflect this historic farmstead character.</p>	<p>Policy BT1 – High Quality Inclusive Design of the Calderdale Local Plan provides the policy framework for achieving quality design. This policy was subject of scrutiny throughout the Local Plan examination process and subject to various rounds of public engagement.</p> <p>The policy contains specific reference to accounting for local context and distinctiveness.</p> <p>Further, all planning applications will be assessed against Local Plan Policy BT2 - Privacy, Daylighting and Amenity Space and Annex 2 - Space About Dwellings with regards to residential amenity for new and existing residents.</p> <p>With regards to historic character, all forthcoming applications will be assessed against Policy HE1 – Historic Environment of the Calderdale Local Plan, which has specific reference to elements which make a particularly important contribution to the identity, sense of place and local distinctiveness.</p> <p>The Council's Conservation Team and Historic England have been consulted throughout the Local Plan process, in the formation of this SPD and will also be on submission of phased planning applications. Historic England have welcomed the inclusion of the validation requirement to prepare a site-specific Heritage Statement or Heritage Impact Assessment (as appropriate) and Archaeological Appraisal.</p>

	<p>Specific treatment needs to be given to 6-10 Ryecroft Lane with regard to space around buildings. The first-floor barn windows are down to floor level. This needs to be addressed in any layout to ensure adequate privacy and protect residential amenity and use of outside space.</p> <p>Frontage treatment and planting to the rear of 5-9 Ryecroft Lane and how the key building works needs to be explained. This is unclear. The key building needs to be restricted to 2 storeys.</p>	<p>Policy BT2 - Privacy, Daylighting and Amenity Space of the Local Plan provides the policy framework for securing adequate space around buildings.</p> <p>All new development within the Garden Community will need to demonstrate that it would not result in any significant adverse impact on the living conditions of existing adjacent residents or other occupiers with regard to privacy, daylight and over-shadowing in particular. It must also provide acceptable living conditions for future occupiers in respect of privacy, daylighting and private amenity space.</p>
	<p>There is a problem of surface water flooding around the Ryecroft Lane entrance to the site. The layout, increase in hard surface and drainage needs to ensure this is not made worse. This is a specific issue for 5-9 Ryecroft Lane. The gardens become waterlogged as the water table rises and the cellars of these properties regularly flood after prolonged or heavy rainfall and when the vegetation has been cut back. Mitigation is required.</p>	<p>See above response regarding consultation with the Environment Agency and the Council's Drainage Team at phased application submission stage.</p>
	<p>Page 89</p> <p>As before, reference to the settlement of Upper Woodhouse and non-designated heritage assets, farm cottages and converted barns should be made.</p> <p>Vistas should connect Toothill Green/Firth House Lane with the Upper Woodhouse and Firth House farmsteads to maintain the historic connection within this rural farming area.</p> <p>As above, we agree dwelling heights MUST not exceed 2 storey in height adjacent to existing dwellings. An informal layout is required around the Upper Woodhouse settlement.</p>	<p>Please see above response regarding Local Plan policy, Landscape Visual Impact Assessment and building height.</p>
	<p>Gardens facing onto gardens is not favoured. Generally we believe a sensitive approach to dealing with the interface with</p>	<p>Noted – representation to be made at detailed planning application stage.</p>

	existing properties and their protection, would be through a rich ecological buffer, in keeping with the garden community ethos.	
	<p>The use of metal cladding material shown at Ryecroft Lane end appears incongruous. It is not acceptable. Materials should be in keeping with existing stone properties and boundaries. This is especially critical to protect the interface and setting of the historic settlement of Upper Woodhouse.</p>	<p>The Design Code seeks to create a new place which has a distinct sense of place, rooted in its locality and sensitive to local vernacular design and materials, but is also somewhere where there is enough variety to create interest and delight (para 7.1.1). It also says that the architecture should be fresh and distinctive in style, avoiding a pastiche of past styles (para 7.1.4).</p> <p>As set out in paragraph 7.7.9 on page 116, metal cladding may be considered for use on non-residential buildings and may also be acceptable for use as a 'code breaker' on some residential buildings to highlight feature buildings and/or create distinct sub-character areas. However, the material specification must reference and harmonise with colours traditionally found in the surrounding area (para 7.7.3) and will need to be justified and agreed with the Council (para 7.7.5).</p> <p>The inclusion of metal cladding in the material palette aims to provide limited opportunities for the use of a more modern material which can be used to help create interest and delight in carefully chosen locations as a 'feature material'. The combination of stone or brick and well-designed and detailed metal cladding has the potential to produce striking and elegant contemporary buildings which will sit well alongside older properties.</p>
	<p>There is one LEAP play area shown on this plan to the north of Firth House Lane. This appears to be for the whole site. No others can be found. LEAPs need to be provided within 400m. This is outside of 400m Fields in Trust Guidance for much of the site. Play space is therefore deficient and you cannot claim you are prioritising people's wellbeing. We request this is addressed in any masterplan.</p>	<p>As highlighted in Appendix 1 – Site Number LP1451 – Land between Bradley Wood and Woodhouse Lane, Rastrick of the Local Plan, provision of Open Space on the allocation will be above policy requirements. The specific breakdown of phase-by-phase typology requirements, and total provision, is indicated in the Development Guidelines section of the SPD. Specific detail of provision (within each typology) will be in accordance with the guidance provided in the SPDs and</p>

	<p>The masterplan needs to be clearer on the openspace/play strategy and include a visual plan to show how this will be provided and how the standards are met. At the moment it is difficult to follow or understand how this is addressed or how the overall provision will be delivered.</p>	<p>determined at the time of each phased application in consultation with the Council's Open Space Team.</p>
	<p>Are there any diversions of the PROW proposed?</p>	<p>No PROW diversions are currently proposed although this will be clarified at phased planning application stage.</p>
	<p>CU Bradley Wood Area</p> <p>We agree it MUST to be sensitive to wider views and topography.</p> <p>This also MUST be sensitive to the setting of Firth House Farm to comply with the HIA.</p> <p>Developers MUST be required to undertake a LVIA to assess the impact on the landscape. Notwithstanding this the LVIA should have informed the masterplan principles so should have been done as part of the Masterplanning development process. Why has this not been done?</p> <p>The community growing area is not in the right place as previously indicated.</p>	<p>The Council's Conservation Team have been consulted throughout the Local Plan process, in the production of this SPD and will be on submission of phased planning applications (along with Historic England).</p> <p>The Conservation Officer was involved in development of the masterplan and specific projects such as the production of the character appraisal and crucially how this appraisal, along with other evidence bases such as the Heritage Impact Assessment, informed the detailed design code.</p> <p>As referenced, the Heritage Impact Assessment (HIA) was undertaken to support the Local Plan allocation and applications should implement the recommendations provided in the HIA or other suitable mitigation measures agreed by the Local Planning Authority to avoid or minimise the impact on the significance of heritage assets and their setting.</p> <p>While several parcels of development do encroach into the area of high sensitivity highlighted in the HIA, it is considered that other suitable measures are possible which would avoid or minimise the impact on the significance of the heritage assets and their setting.</p> <p>Subsequently, and in consultation with the Conservation Team, the masterplanners identified a landscape set-back from Firth House (including a community orchard) and a defined view corridor from the west as a response to the HIA. In addition, it</p>

		<p>was agreed that development parcels M1, M2 and M3 should have a distinct character with homes having a rural or 'farmstead' feel with an informal arrangement of lanes and courtyards (as set out in the Firth House Farmsteads Character Area on pages 95/96 of the Design Code).</p> <p>Further detail will be provided at phased planning application stage, where there will also be a requirement for a phase specific HIA.</p> <p>Appendix 2 - Validation Requirements of the Draft Woodhouse Garden Community Masterplan SPD indicates a requirement for a Landscape and Visual Impact Assessment to be submitted as part of a phased planning application. The wording of section 4.3.3 will be strengthened to ensure clarity.</p>
	Some existing hedges and trees are not shown in the location of the primary road. Where have these gone? Hedges /trees must be retained on the site – where is the justification for removal of these?	<p>Phased applications will be assessed against the quoted guidance in the NPPF relating to veteran and notable trees along with policy guidance in chapter 23 of the Local Plan – Green Infrastructure and Natural Environment, specifically Policy GN5 – Trees.</p> <p>As stated in Appendix 2 - Validation Requirements of the Draft Woodhouse Garden Community Masterplan SPD, a Tree Survey will be required on submission of phased planning applications as well as Ecological Surveys and Reports.</p> <p>Also see previous responses on BNG requirements.</p>
	The LEAP is not within the required 400m distance. Provision is deficient.	See above response
	<p>Woodhouse Green Area</p> <p>Agree development needs to respond sensitively to the listed Firth House Farm hamlet as well as its setting, including Firth House Lane which provides a long entranceway to the farm with glimpsed views.</p>	<p>The Council's Conservation Team have been consulted throughout the Local Plan process, in the production of this SPD and will be on submission of phased planning applications (along with Historic England).</p>

	<p>Proposals also need to consider the non-listed heritage asset – The Gatehouse and Toohill Green Cottage as well as the interface with Shepherds Thorn Lane and the vistas towards Upper Woodhouse barns and settlement to preserve/enhance character and historical linkages between the farmsteads. A vista does seem to be shown from Firth House to Shepherds Thorn Lane but this fails to make the connection with Toothill Green cottage so is in the wrong place. This does not tally with the previous constraints information which did not mention this. This again means the two documents are contradictory, confusing and not easy to follow/understand.</p>	<p>The Conservation Officer was involved in development of the masterplan and specific projects such as the production of the character appraisal and crucially how this appraisal, along with other evidence bases such as the Heritage Impact Assessment, informed the detailed design code.</p> <p>As referenced, the Heritage Impact Assessment (HIA) was undertaken to support the Local Plan allocation and applications should implement the recommendations provided in the HIA or other suitable mitigation measures agreed by the Local Planning Authority to avoid or minimise the impact on the significance of heritage assets and their setting.</p> <p>Further detail will be provided at phased planning application stage, where there will also be a requirement for a phase specific HIA. Any forthcoming layout will need to reflect the results of the HIA in this area.</p>
	<p>Sufficient 15m buffers need to be added to protect the hedgerows on Firth House Lane and especially those of higher conservation value which are located on both sides. This route is a critical commuting path for the significant bat population on the whole site.</p>	<p>Although bat transit routes are not legally protected, they are an important consideration that will be taken into account at the planning application stage.</p> <p>Maintaining the ecological functioning of the Wildlife Habitat Network will be considered at the planning application stage. Existing boundary habitats will be retained and enhanced where possible.</p>
	<p>We note the LEAP play area is located in phase 3. This is the last phase and on land which is unregistered. How will the play provision be met/satisfied for the developed part of the site(phases 1 and 2)? This is why there MUST be a strategy for the delivery of open space/play provision.</p>	<p>See above response regarding open space provision.</p>
	<p>The main hedgerows are on the western side not as shown on eastern side. This needs to be reflected in the plan.</p> <p>Firth House Farmsteads Area</p>	<p>The Council's Conservation Team have been consulted throughout the Local Plan process, in the production of this</p>

	<p>We agree the setting and listed assets need to be adequately protected and enhanced in accordance with the Heritage Impact Assessment (HIA). This MUST also include the setting of the non-listed Gatehouse and Toothill Green Cottage.</p> <p>A vista MUST be retained to Toothill Green Cottage to provide a historic connection. This is currently offset and does not provide this visual and important connection as you have placed development in front of it.</p>	<p>SPD and will be on submission of phased planning applications (along with Historic England).</p> <p>The Conservation Officer was involved in development of the masterplan and specific projects such as the production of the character appraisal and crucially how this appraisal, along with other evidence bases such as the Heritage Impact Assessment, informed the detailed design code.</p> <p>As referenced, the Heritage Impact Assessment (HIA) was undertaken to support the Local Plan allocation and applications should implement the recommendations provided in the HIA or other suitable mitigation measures agreed by the Local Planning Authority to avoid or minimise the impact on the significance of heritage assets and their setting. While several parcels of development do encroach into the area of high sensitivity highlighted in the HIA, it is considered that other suitable measures are possible which would avoid or minimise the impact on the significance of the heritage assets and their setting.</p> <p>Subsequently, and in consultation with the Conservation Team, the masterplanners identified a landscape set-back from Firth House (including a community orchard) and a defined view corridor from the west as a response to the HIA. In addition, it was agreed that development parcels M1, M2 and M3 should have a distinct character with homes having a rural or 'farmstead' feel with an informal arrangement of lanes and courtyards (as set out in the Firth House Farmsteads Character Area on pages 95/96 of the Design Code).</p> <p>Further detail will be provided at phased planning application stage, where there will also be a requirement for a phase specific HIA.</p>
	Toothill Gateway Area	See above response regarding density

	<p>The access road and development parcels need to protect the setting of the un-designated historic Gatehouse and its grounds. This includes protecting the hedgerows and tree lined boundary along the southern boundary wall.</p> <p>The access arrangements for the whole site from the A641 Huddersfield Road MUST also consider the impact on the Toothill Hall listed assets to west.</p> <p>As with the whole of the southern boundary which forms the Kirklees Green belt careful consideration needs to be given to protecting the interface with the green belt and providing appropriate boundary treatment. No mention is made of this.</p> <p>The LEAP is not within the required 400m distance. Provision is deficient.</p> <p>We question the densities here and why the area shown as Woodhouse Centre should have higher densities given its historic value.</p>	<p>HIA required on submission (non-designated assets)</p>
	<p>Frontages</p> <p>We can see no issues with the frontage philosophy. However, it is not clear what the key buildings really mean on corners and how these will work. Further explanation is required so we can understand this before we can comment or accept this.</p> <p>A landscaping buffer needs to be shown instead of ‘areas to back/side on to protect existing properties’. In one part you suggest buffer planting or gardens backing on. On this the buffer is not mentioned. As before we generally favour buffering at the interface with existing properties.</p>	<p>Detail to be considered at planning application stage.</p> <p>All planning applications will be assessed against Local Plan Policy BT2 - Privacy, Daylighting and Amenity Space and Annex 2 - Space About Dwellings with regards to residential amenity for new and existing residents.</p> <p>Policy BT2 - Privacy, Daylighting and Amenity Space of the Local Plan provides the policy framework for securing adequate space around buildings.</p> <p>All new development within the Garden Community will need to demonstrate that it would not result in any significant adverse impact on the living conditions of existing adjacent residents or other occupiers with regard to privacy, daylight and over-shadowing in particular. It must also provide acceptable living</p>

		<p>conditions for future occupiers in respect of privacy, daylighting and private amenity space.</p> <p>Further guidance standards on privacy, daylighting and amenity space can be found at Annex 2 - Space About Dwellings of the Calderdale Local Plan. The guidance includes recommended space standards that will be applied in assessing residential development proposals.</p>
	<p>Boundary Treatment</p> <p>We agree there needs to be consistent approach along an entire street length to avoid a proliferation of different boundary styles.</p>	<p>Throughout development of the masterplan and design code documents, careful consideration has been given to the choice of wording and the implications this may have. The Calderdale Local Plan is ultimately the policy framework upon which these documents are based, any planning application will therefore need to be in conformity with these policies - it cannot go further or introduce policy or reduce the flexibility that a policy often provides. A delicate balance must be achieved in providing supplementary guidance and avoiding producing a rigid set of parameters that results in an unusable document that could in turn stymie delivery of the Garden Community.</p>
	<p>Stone walling MUST be used on Ryecroft access extension interface to tie into existing Upper Woodhouse settlement character.</p>	<p>Noted</p>
	<p>Local Centre</p> <p>The community should be supported by an adequate mix of uses and community facilities. Whether these are the right facilities is questionable and viability needs to be assessed. We can see no proof work has been done to assess what the appropriate facilities should be or how sustainable these will be. A proper assessment MUST be undertaken to verify requirements and need to make sure this is deliverable and you are not creating a centre that does not work.</p> <p>The original plan was for a health facility which would make sense sustainably but we know this is not going to happen.</p>	<p>Joint working with the Clinical Commissioning Group (CCG) around the delivery of primary care health and wellbeing facilities has continued throughout the development of the Local Plan, including liaison with the Lower Valley Primary Care Network of GPs in Southeast Calderdale and the NHS Estates Delivery Unit.</p> <p>Discussion with the NHS Estates Delivery Unit confirmed that there would be no appetite for the provision of on-site health and wellbeing hubs that could accommodate surgeries, pharmacies and other associated facilities. Increased demand will instead be accommodated through the enlargement of existing facilities in the local area.</p>

	Can the site support another local shop when one exists on Woodhouse Lane. Similarly, there is a community room that can be hired in Bradley Woods with a bar. What is the community building for – there is no explanation? There is also a second community building/pavilion proposed around the cricket ground. Can the site support 2 community buildings? How far will these duplicate space?	The second community centre located at the cricket ground highlights the possibility of improved facilities as part of the secondary access developing proposal.
	What exactly is a mobility hub – you list a number of features but this is meaningless - we do not understand what it is, how it works or what it is supposed to achieve. Who is funding this?	<p>Mobility hubs bring together shared transport with public transport and active travel in spaces designed to improve the public realm for all.</p> <p>The concept is increasingly spreading in the UK and will complement the ethos of the Garden Communities in providing active travel and enhanced connections. While the contents of the mobility hubs are yet to be finalised, provision will be based on CoMoUK guidance.</p> <p>The mobility hub will be one of the roof tax items as detailed in the Implementation chapter of the SPD.</p>
	The delivery of part of the local centre is now shown to be reliant on a third party. This does not demonstrate it is deliverable – what controls are in place to achieve this. This was supposed to be delivered/funded by the developers' contributions but delivery of this is now very woolly. The SPD needs to be much clearer on what is required to meet defined needs and also how these will be delivered/funded.	Noted – as above.
	<p>School</p> <p>The site is adjacent to the listed Firth House hamlet. The Heritage Impact Assessment - HIA shows an area of significant impact extending into the school site where protection is required) and archaeological remains are potentially present</p>	Please see previous responses.

	both adjacent to and on the school site. There is no mention of these or the impact on them. How is this being addressed?	
	The impact on heritage and archaeological assets needs to be added with mitigation requirements to ensure the setting and rural ambience of the hamlet is protected and remains are dealt with adequately.	<p>In accordance with Local Plan policy, development proposals must be informed by an understanding of the significance of the listed buildings and their setting. Applications will need to be accompanied by an evaluation of the potential impact proposed schemes may have upon their significance and set out any mitigation required.</p> <p>A Heritage Impact Assessment (HIA) was undertaken to support the Local Plan allocation. Applications should implement the recommendations provided in the HIA or other suitable mitigation measures agreed by the Local Planning Authority to avoid or minimise the impact on the significance of heritage assets and their setting.</p>
	Do the school playing fields have dual use – for school and community? It is unclear. On some plans the NEAP is shown to be located in the school playing field area. It is not shown on the School Framework Plan. Why is this? Who is delivering the NEAP? How will it be accessed by the community if it is part of the school grounds?	All facilities including the public open spaces, play areas, pitches, community centre and associated activities will be open to all residents, both new and existing.
	The green link crosses land in private ownership. There is obviously a right of way across it – but how will this be delivered? The existing buildings associated with Firth House Farm hamlet appear to be omitted. How are these to be dealt with and what is the impact?	Details to be considered at phased planning application stage when site layouts are proposed.
	Built Form We agree this should reflect and reinforce local distinctiveness. We request the WYAAS Landscape Character Assessment 2017 be used to inform the local distinctiveness.	While the masterplanning team were provided with the referenced document, a thorough, up to date character appraisal was carried out as part of the masterplanning process. The results of which have informed the detail of the design codes.

	<p>Page 112 – we do not understand what GRP is. You need to explain and not use three letter abbreviations.</p> <p>Requirements seem acceptable/adequate and support the emphasis on quality.</p>	Agreed - Amendment necessary.
	<p>PUBLIC SPACE</p> <p>Open space does need to be as permeable as possible. The site suffers from significant surface water flooding already especially around the end of existing Ryecroft Lane. This runs down the field as streams towards Woodhouse Gardens.</p>	Noted.
	<p>P121 Lighting</p> <p>Reference needs to be made to protecting habitats from lighting This is especially important for the significant bat population on the site. Lighting plans need to ensure lighting along key commuting routes is appropriate. A full bat survey MUST be required to assess the requirements on a lighting plan and habitat retention.</p> <p>Public Art</p> <p>Recycling of existing materials from the site must be considered ie stone</p>	<p>The subject of lighting is considered in the draft Design Code SPD at section 4.6.16. Lighting will also be considered at the planning application stage.</p> <p>A Lighting Assessment is included in Appendix 2 - Validation Requirements of the Draft Woodhouse Garden Community Masterplan SPD as a validation requirement on forthcoming applications.</p> <p>See previous responses on use of wording that will go beyond policy requirements of Local Plan.</p>
	<p>Street Trees</p> <p>The existing area is already characterised by street trees. This needs to be incorporated into the design and in any case is now a stipulation of NPPF.</p> <p>The existing trees reference also needs to qualify that these need to be protected with adequate 15m buffers.</p>	See above response regarding tree protection policies at both local and national level.
	<p>Inclusive Design</p>	Inclusive Neighbourhoods is a key ethos of the Garden Communities as identified in the Vision and Core Objectives Chapter.

	Access for all needs to be more prominent. The section on Inclusive Design covers this but it needs to be more prominent and in the vision. Should this be at the front end?	
	<p>Secured by Design Principles</p> <p>We agree Secured by Design Principles must be adopted in the site design and should be considered early in the process in liaison with the police.</p>	<p>In order to enable regular discussion and update, the Council established a Garden Communities Project Working Group including officers from planning, transport, education, flood risk and ecology. This group met on a regular basis to review and comment on aspects of the Masterplan SPD and associated Design Code SPD as they emerged.</p> <p>Representatives of public sector agencies including the Environment Agency, Yorkshire Water, Sport England, West Yorkshire Ecology, NHS Estates / Clinical Commissioning Group and West Yorkshire Police were invited to particular workshops or met individually as appropriate.</p> <p>In addition, a series of in-depth topic workshops were held covering stewardship, ecology, drainage, highways design and design coding. These were attended by relevant council officers and various external stakeholders as listed above.</p>
	There is a need to liaise with operators of Bradley Wood Scout Camp which abuts the site. The camp and woodland is heavily restricted for safeguarding reasons with just a public route running through it. Users of the camp access the site and undertake activities beyond the site via the existing Woodhouse fields. There is no assessment/consideration of the wider context yet again.	See above response regarding scope and extent of public engagement and methods employed.
	<p>RESOURCES</p> <p>P129-130</p> <p>Energy/sustainability</p> <p>Given the climate emergency, it needs to be clear how we are requiring developers to construct housing with the minimal carbon footprint? This is supposed to be garden community</p>	The Renewable and Low carbon chapter of the Local Plan provides the policy framework relating to developments supporting renewable and low carbon energy. These themes are developed in more technical detail in this and other emerging SPDs, specifically the Renewable and Low Carbon SPD.

	<p>with green credentials. This is not dealt with sufficiently within the document.</p> <p>How does this conform with the requirements in the Local plan and also the developing general Placemaking and Design Guidance SPD.</p>	<p>These documents are set against a national picture where planning policy and guidance is expected to be strengthened through changes to the planning system. Initiatives such as the Future Homes Standard and the ongoing strengthening of the Building Regulations will, for example, require greater levels of energy efficiency and renewable and low carbon energy to be utilised in new developments over the construction period of the Garden Communities</p>
	<p>COMMUNITY STEWARDSHIP</p> <p>The community stewardship approach is altruistic. Community asset transfer can work where people are passionate about retaining a specific building for instance but even then this can be set with problems. This is based on experience of one of our members who has direct experience of supporting community groups with community asset transfers. What you are proposing is something far greater than a single asset transfer and the expectation you are placing on a community that is not even there, is unacceptable and unmanageable. The responsibility for proper management and maintenance of the assets and public space should be the Council's /developers responsibility not the residents.</p> <p>Notwithstanding the above, if service charges are enforced on the Garden Communities, these need to be properly assessed and considered in the light of affordability. This is especially critical for those in affordable homes as service charges can easily push costs beyond affordable levels. Has this been considered?</p> <p>If we are reading this correctly (Para 11.6.8 of the Masterplan SPD) it also seems you are expecting the existing Woodhouse and Thornhill communities to contribute to the upkeep of the site, play areas, public realm etc via a service charge but this is not well articulated. Why would we do that? What we have now is a fantastic natural resource where we can get out into the</p>	<p>The community stewardship approach set out is tried and tested, with demonstrable benefits to residents and the housebuilders. It creates a sense of community and local ownership from the beginning, which is crucial to ensuring a successful new community at this scale.</p> <p>The assets will be transferred to the new Trust fully fit for purpose with sufficient revenue to ensure day to day and long term maintenance. They will be professionally run, and the local community and stakeholders involved in their governance.</p> <p>The proposed service charges to be paid only by the new (not existing) residents have been costed and are affordable for residents of all tenures.</p> <p>All facilities including the public open spaces, play areas, pitches, community centre and associated activities will be open to all residents, both new and existing.</p>

	<p>countryside to experience great wildlife and habitats. This development is not a benefit to us and we will have to suffer many years of distress and disruption while it is being developed.</p> <p>We accept where we are in the process now and we will endeavour to achieve the best environment we can, one that does not obliterate our rich environment. However, there is absolutely NO WAY we are going to pay for the privilege of crossing/using the site or managing/maintaining it. Legally you could not impose this noting it is not within our freehold agreements.</p> <p>Exactly what is it you think we are gaining from this? We lose the environment that makes this a unique and special place, we already have a local convenience store and post office that we can use on Woodhouse Lane, there is a community centre available in Bradley Woods as well as a local school with facilities.</p> <p>We also raise concern about imposing this on a community that is not even there. They have not been consulted on it and no buy-in exists for it. It is therefore a totally unfounded proposition. How is this supposed to work?</p>	
	<p>DESIGN COMPLIANCE CHECKLIST</p> <p>We agree this MUST be a requirement when submitting a planning application to verify all aspects have been considered and addressed.</p> <p>However, the document is very lengthy, not an accessible read and the design principles are not easy to pick out/understand. Developers need clarity and this does not give it. They are not going to want to trawl through the document trying to identify and pick out what the requirements are. It's like looking for a needle in a haystack. The document is not currently fit for</p>	<p>Agree that the purpose of completing the Design Compliance Checklist is to verify that all aspects of the requirements have been considered and addressed. To do this, developers will need to read the relevant parts of the document in full to understand what those requirements are and how they need to respond. The Design Compliance Checklist is structured in a way that forces them to do this and then confirm that they have done so.</p> <p>The masterplanning team consider that the document is of an appropriate length for a site of this size and complexity and that</p>

	<p>purpose and requires further work. Our comments need to be integrated and the checklist needs to be updated accordingly.</p> <p>On the checklist at Chapter 1 it states 'concrete block paving'. This does not look right. Should it be 'context'??</p>	<p>the design principles are clearly set out, with the use of 'must' and 'should' highlighted in bold helping to identify them. Text on checklist which states 'Concrete block paving' is incorrect.</p> <p>There will be an amendment to the text on the checklist which says "Chapter 1" and "Concrete block paving" to "Chapter 2" and "Regulatory Plan: Do the proposals comply with...".</p> <p>Change also relates to Thornhills Design Code.</p>
	<p>3 WOODHOUSE MASTERPLAN SPD</p> <p>3.1 General Comments</p> <p>Appearance:</p> <p>The document appears unfinished. A foreword is missing, evidenced by the text box.</p> <p>There are spelling mistakes in the text.</p> <p>The keys to plans do not match the hatches, colours and line types shown on the plans.</p>	<p>Noted – final version will not include this reference.</p>
	<p>This document is titled as a 'masterplan' but does not provide a masterplan of the site. There are indicative schematics or the broad-brush concepts which contradict each other.</p>	<p>Noted –various suggested amendments have been passed to the masterplanning team.</p> <p>Throughout development of the masterplan and design code documents, careful consideration has been given to the choice of wording and the implications this may have. The Calderdale Local Plan is ultimately the policy framework upon which these documents are based, any planning application will therefore need to be in conformity with these policies - it cannot go further or introduce policy or reduce the flexibility that a policy often provides. A delicate balance must be achieved in providing supplementary guidance and avoiding producing a rigid set of parameters that results in an unusable document that could in turn stymie delivery of the Garden Community.</p>

	<p>Infrastructure:</p> <p>The lack of focus on the infrastructure and access to site and how this will facilitate the construction phasing shows no understanding or consideration of the impact on the existing community.</p>	<p>See amendments to the phasing section providing more clarity around the points at which key infrastructure items will be required.</p>
	<p>The phasing of the construction of individual parcels contradicts the highway infrastructure and access hierarchy. It puts the emphasis on the existing limited infrastructure supporting phases 1 and 2 before a connected central spine road (primary street) is provided. It is noted that the vehicular access from Ryecroft Lane and Woodland Gardens will be restricted but this will not be possible if there is no primary route out onto Huddersfield Road. This could impact on the exiting community for a number of years since an estimate of 11 years for the construction period is given in the document.</p> <p>How will the construction traffic navigate the existing streets given the size of plant and material requirements to construct the number of properties and school in the initial phases? There is no consideration of this or the requirements.</p>	<p>The point at which the primary street will be required will depend on the outcome of the phase specific transport work.</p> <p>Applicants will be required to submit a Construction Management Plan (CMP) as part of any planning application submission. A CMP should address how adverse impacts associated with development and cumulative impacts of any other nearby construction sites will be managed.</p> <p>The design code also provides guidance relating to temporary landscape treatments, which will assist in minimising the impact of ongoing construction work and improve the appearance of undeveloped land. See Temporary Landscape Treatments section 8.1.22.</p>
	<p>Services:</p> <p>There is no mention of the existing services infrastructure within the document. How will the development be serviced in terms of gas, electricity, foul and surface water drainage?</p> <p>Given the size of the development, will this require a major installation and upgrade in terms of gas supply, electric supply and sewerage.? Will this require a branch off Huddersfield Road which would change the emphasis on which phases should be delivered first?</p> <p>The same goes for the current Redrow proposal, how will the initial phases be serviced?</p>	<p>In terms of utility provision, throughout the Local Plan process, the Council regularly met with representatives of all the relevant statutory organisations / providers and shared details of the scale, timing and distribution of growth proposed within Calderdale. These included Northern Gas Networks, Yorkshire Water and Northern Power Grid. Parties found regular sharing of information to be helpful including as part of their own asset management, systems and investment planning programmes.</p>

	<p>Noting the topography of the land, how will the sewerage requirements be met? The existing infrastructure adjacent to the proposed development will only be sized to accept the current properties. Noting the land was previously greenbelt and development free, additional capacity will not have been considered. An additional 680 (number of homes indicated before mitigation required) properties will require a significant upsize in capacity. What assessment has been made of this?</p>	
	<p>Where will these new runs or connections be made given the fall of the land and location of the railway track?</p> <p>Would the sewage have to be pumped up to the interface with Huddersfield Road?</p>	<p>Utility providers are also consulted as part of the borough-wide Infrastructure Delivery Plan preparation, the Garden Communities masterplanning process (including attending relevant workshops on specific matters) and on the draft SPDs.</p>
	<p>Drainage:</p> <p>The current topography of the site would indicate that the surface water flows will fall from southwest to northeast but with a crossfall to the north which will impact on the existing properties to the north if not addressed.</p> <p>Due to the density of housing proposed in these areas there does not appear to be sufficient space to mitigate the surface water flows through attenuation or SUDS. What assessment of this has been undertaken and how is this verified?</p> <p>The initial parcels and phases in this area will therefore have to deal with the flows from across the site which collect in this area until the later phases are developed.</p> <p>Where will the outfalls from the site connect with the existing infrastructure given the topography of the site and the railway being between the site and the River Calder?</p>	<p>The majority of the site drains towards the east/southeast, towards Bradley Park Dike which runs along the southern boundary. The northern and western parts of the site do fall towards the existing houses. The drainage will be designed to manage runoff from this area and direct it to the proposed site SW drainage system. In consultation with the drainage strategy consultants, flows will not be directed to existing properties.</p>
	<p>Services, infrastructure and drainage across the whole site need to be considered now. You cannot keep pushing it back to individual, ad hoc planning applications. You are already saying the whole site might not be developed in this document</p>	<p>The Drainage Strategy will be developed with the parcels of land in mind, so that surface water from each parcel will be collected, and sufficient storage for the design flood event (plus</p>

	<p>if mitigations do not materialise –this is totally contrary to the plan that has only just been approved and the achievement of your housing requirement.</p>	<p>an allowance for climate change and urban creep) provided, in agreement with the DS consultant.</p> <p>Discussions with the DS consultant highlighted the phased approach and drainage connections and outfalls will be provided to link initial phases to the ultimate outfall, this was highlighted to be Bradley Park Dike to the east of the site, which drains into the River Calder.</p> <p>The LLFA are awaiting the finalised DS for the whole site however initial talks with the consultant have been productive and are expected to be in line with the comments raised. The whole site drainage will be addressed before any individual detailed site drainage plan.</p>
	<p>Construction:</p> <p>How will the impacts on the existing community and surrounding habitat be mitigated given the location of the initial phases? Traffic movements into and out of the site would seem prohibitive given the limited accessibility. How will the necessary construction equipment and materials for the initial houses be brought in without an adverse impact on the exiting community? The obvious answer would be to provide an access from Huddersfield Road, as we have always maintained, but this does not appear to have been considered.</p>	<p>Applicants will be required to submit a Construction Management Plan (CMP) as part of any planning application submission. A CMP should address how adverse impacts associated with development and cumulative impacts of any other nearby construction sites will be managed.</p>
	<p>In relation to this, following community member discussions at the recent Redrow consultation event they confirmed they are now accepting there is a problem and have indicated a temporary road will need to be constructed to get in!</p> <p>We have always argued that the first phase needed to be from the A641 for these reasons and good planning but you and IDP Planning have consistently and sadly, not been truthful to the Inspector. This is shocking.</p>	<p>The design code also provides guidance relating to temporary landscape treatments, which will assist in minimising the impact of ongoing construction work and improve the appearance of undeveloped land. See Temporary Landscape Treatments section 8.1.22.</p> <p>The Council's Environmental Health Team will also be consulted as part of the application process.</p>

	Noise and pollution in and around the site would also have to be mitigated.	<p>Any planning application will need to be prepared taking into account the conclusions of an Air Quality Impact Assessment, and additionally be compliant with Policy EN2 – Air Quality of the Local Plan, which was subject to modifications requested by the Inspector.</p> <p>Appendix 1 of the Draft Woodhouse Garden Community Masterplan SPD sets out the anticipated Section 106 Requirements for each phase, and includes a contribution up to the estimated damage cost to be spent on air quality improvements within the locality, determined by the Air Quality Impact Assessment for each phase.</p> <p>Other policies included in the Local Plan and developed in the SPDs will also contribute to mitigating increases in air pollution, such as provision of Green Infrastructure, Sustainable Transport and the Natural Environment.</p>
	How will the impact on the existing habitats to be preserved be mitigated? This is NOT adequately covered.	See previous comments regarding the policy approach to the natural environment.
	<p>3.2 Comments on text</p> <p>Introduction</p> <p>Page 5</p> <p>Document appears incomplete as text box notes ‘Richard to provide foreword...’ This appears unprofessional and raises the question what else needs to be included which has not yet been completed?</p>	Noted – final version will not include this reference.
	<p>Purpose and Scope</p> <p>1.1.1 Why is it described as a strategic urban extension of Brighouse when there appears to be no infrastructure strategy to facilitate the proposed housing and you are dealing with it as a series of individual sites? What facilities are to be provided and how will a local centre be created?</p>	See Development Guidelines Chapter.

	<p>1.1.2 If the SPD's are be considered a material consideration of the planning process why in the pre-application consultation by Redrow Housing have the draft proposals been ignored?</p> <p>1.1.3 As above how are we supposed to comment on the Redrow proposals when this document is not yet adopted or even commented on?</p>	<p>See above response on topic.</p>
	<p>1.1.4 This refers to Appendix A Site Allocations – Supporting Information which provides the key constraints and mitigations in the Local Plan. These have all been agreed through the Local plan process yet already some of these seem to be ignored. Eg requirement for LVIA as part of the Masterplanning process, Infrastructure Cost Delivery Plan to include phasing to indicate when key infrastructure will be required (noting an extremely flimsy table on page 48 which is not costed and still says nothing about how the site will be delivered). These should have ALL been incorporated into this document.</p>	<p>The SPD provides appropriate additional guidance on how the Garden Community will be delivered, including infrastructure delivery (see paragraph 6.2) and the approach to the use of developer contributions including the roof tax and other section 106 obligations (see paragraphs 6.3 and 6.4 and Appendix 1 of the Masterplan. Individual section 106 agreements will need to reflect this guidance.</p> <p>Appendix 2 - Validation Requirements of the Draft Woodhouse Garden Community Masterplan SPD indicates a requirement for a Landscape and Visual Impact Assessment to be submitted as part of a phased planning application. The wording of section 4.3.3 will be strengthened to ensure clarity.</p> <p>Throughout the masterplanning process, the Council has commissioned an Infrastructure Delivery Cost Plan and numerous viability assessments. This work attributes costs to the infrastructure necessary for development schemes within the Garden Communities to be funded by future house builder schemes in so far as it is viable to do so.</p> <p>The work also identifies project costs that are of wider benefit which cannot be attributed to a phase schemes. Costs that cannot be allocated to phase plots need to be funded and delivered by the Council. These Council-delivered works are proposed to be funded through prudential borrowing</p>

		<p>which is capable of recovery via a roof tariff mechanism levied on each new home.</p> <p>The Council's valuation specialist advisors have presented their viability assessment report findings based on proposed tariff rates derived from the capital cost estimates attributed to the critical schemes. These findings confirm that the Garden Communities are viable based on these input assumptions.</p> <p>See section 6.1.7 detailing the approach to piecemeal development.</p>
	<p>1.1.5 As noted in 1.1.2, the prevention of piecemeal development appears to have already been ignored. The masterplan does not provide effective controls to stop this and indeed seems to promote the development of the site in an ad hoc way. The whole point of the masterplan is to provide the controls to prevent developers seeking only to further their specific land holdings. The masterplan appears to be contrary to this and Policy IM8 as it now seems to allow piecemeal developments without understanding how the site as a whole will be developed in terms of all forms of infrastructure and services, drainage, open space and play.</p>	<p>Request outside the scope of this SPD consultation.</p>
	<p>Page 6</p> <p>The plan should show the Bradley Garden Community and loss of open space (part of the golf course) that is proposed in the Kirklees adopted Local Plan. Without this the plan fails to reflect the true, contextual picture. We still have a total disconnect between the two developments even though they straddle each side of the M62 in close proximity. We have been promised an M62 Corridor Strategic Growth Masterplan covering all the garden communities to ensure effective planning of growth within the locality but this has never</p>	<p>The Council agree to change the proposed employment areas shown in Kirklees on Site Opportunities plan to residential in line with Bradley Park housing development. The plan on page 6 is however a location plan showing existing development, rather than proposed allocations.</p> <p>Comments regarding the South-East Calderdale and Kirklees Joint Masterplanning Framework are outside the scope of this consultation.</p>

	<p>materialised. Where is this? How are the cumulative impacts being dealt with? This is fundamentally unacceptable.</p> <p>The administrative boundary line does not connect in the middle or cannot be seen at the scale. Are all these elements existing or proposed?</p>	
	<p>Page 7 – 1.2</p> <p>Again, it is disappointing that the community do not appear to feature in the SPD preparation and are not even referenced as a key stakeholder. This is contrary to IM7. We also believe the consultation has NOT been extended to all landowners on the Woodhouse Site – specifically the owner of the unregistered land parcel.</p>	<p>In terms of the unregistered land, the Council's property advisor, Avison Young were appointed in late 2021. They have been in regular contact with the key landowners, via their appointed agents, since being appointed to support commercial matters relating to project delivery.</p> <p>The key landowners (including those with an interest in the land alluded to in the question) have also employed their own agents. The Council has been kept informed regularly, by Avison Young, of these landowners' intention to permit development on their landholdings and to work collaboratively to deliver the development in its entirety, over the course of time.</p> <p>These owners' or their appointed representatives have signed a memorandum of understanding which provides initial comfort to Council officers that the land is available for comprehensive delivery. Additionally, we are aware that a legally binding landowners collaboration agreement is at an advanced stage of drafting which will confirm this approach.</p>
	<p>The Garden Communities Toolkit is clear 'engagement with local people and stakeholders must feed into the evolution of the masterplan'. How have you done this? We do NOT accept you have undertaken a transparent process – where is the information to verify the following?</p> <p>1.2.4 What external stakeholders were invited?</p>	<p>See above response on engagement.</p> <p>In order to enable regular discussion and update, the Council established a Garden Communities Project Working Group including officers from planning, transport, education, flood risk and ecology. This group met on a regular basis to review and comment on aspects of the Masterplan SPD and associated Design Code SPD as they emerged. Representatives of public</p>

		<p>sector agencies including the Environment Agency, Yorkshire Water, Sport England, West Yorkshire Ecology, NHS Estates / Clinical Commissioning Group and West Yorkshire Police were invited to particular workshops or met individually as appropriate.</p> <p>In addition, a series of in-depth topic workshops were held covering stewardship, ecology, drainage, highways design and design coding. These were attended by relevant council officers and various external stakeholders as listed above.</p> <p>Many comments were received from various stakeholders on the allocation of the site in the Local Plan. The issues raised during the Local Plan preparation informed the resulting Site Specific Considerations in Appendix 1 – Site Number LP1451 – Land between Bradley Wood and Woodhouse Lane, Rastrick, many of which were recommended as Main Modifications by the Inspector, and it is these on which the SPD has built. This SPD consultation is an opportunity for all stakeholders to make comment on the draft documents and help shape the final Masterplans and Design Codes.</p>
	<p>1.2.6 The A641 Corridor Investment Programme has been noted as a strategic project. What mitigation is in place should this project not be implemented? We already know it does not include the required mitigations for the Garden Communities as required in the latest Infrastructure Delivery Plan. If these are not going ahead, you need to demonstrate how the strategic infrastructure will be delivered to support the delivery of the Garden Communities.</p>	<p>Comments relate to matters outside the scope of the SPD consultation.</p> <p>There is no suggestion that the A641 programme will be paused or cancelled.</p>
	<p>1.2.6 What are the viability appraisals mentioned?</p>	<p>Throughout the masterplanning process, the Council has commissioned an Infrastructure Delivery Cost Plan and numerous viability assessments. This work attributes costs to the infrastructure necessary for development schemes within the Garden Communities to be funded by future house builder schemes in so far as it is viable to do so. The work also</p>

		<p>identifies project costs that are of wider benefit which cannot be attributed to a phase schemes.</p> <p>Costs that cannot be allocated to phase plots need to be funded and delivered by the Council. These Council-delivered works are proposed to be funded through prudential borrowing which is capable of recovery via a roof tariff mechanism levied on each new home.</p> <p>The Council's valuation specialist advisors have presented their viability assessment report findings based on proposed tariff rates derived from the capital cost estimates attributed to the critical schemes. These findings confirm that the Garden Communities are viable based on these input assumptions.</p> <p>See above response regarding drainage.</p>
	<p>1.2.7 You say a drainage and infrastructure strategy has been developed. This should form part of the documentation. How is the drainage and infrastructure delivery to be implemented if the various areas of developments are to be built piecemeal? How is the critical infrastructure to be implemented? Are the initial developments required to provide the necessary infrastructure for the later developments crossing their sites? With the options for stewardship and management, does this mean the council is not going to adopt the open spaces play areas and streets?</p>	<p>See chapter 7 – Implementing the Stewardship Strategy for details of adoption arrangements.</p>
	<p>Where is the explanation of the cost plan of critical infrastructure and roof tax tariff mechanism that needs to be followed?</p> <p>1.2.8 Is this the only opportunity for consultation – this is not clear? The document does not indicate what the engagement process is.</p>	<p>The SPD provides appropriate additional guidance on how the Garden Community will be delivered, including infrastructure delivery (see paragraph 6.2) and the approach to the use of developer contributions including the roof tax and other section 106 obligations (see paragraphs 6.3 and 6.4 and Appendix 1 of the Masterplan. Individual section 106 agreements will need to reflect this guidance.</p> <p>The Town and Country Planning (Local Planning) (England) Regulations 2012 require a Local Planning Authority to</p>

		undertake public consultation on draft SPDs for a minimum of four weeks, and to take account of any comments received in preparing the final documents.
	Policy Context Page 8 1.3.2 Noting the climate emergency, what constraints if any, are the council placing on the developers to construct the housing with the minimal carbon footprint? This is not clear.	<p>The Renewable and Low carbon chapter of the Local Plan provides the policy framework relating to developments supporting renewable and low carbon energy. These themes are developed in more technical detail in this and other emerging SPDs, specifically the Renewable and Low Carbon SPD.</p> <p>These documents are set against a national picture where planning policy and guidance is expected to be strengthened through changes to the planning system. Initiatives such as the Future Homes Standard and the ongoing strengthening of the Building Regulations will, for example, require greater levels of energy efficiency and renewable and low carbon energy to be utilised in new developments over the construction period of the Garden Communities.</p>
	1.3.4 In the second sentence, this text does not appear to make sense as there appears to be punctuation missing. What is the definition of a small site? Is it the equivalent of the parcels of development proposed or smaller? Noting the requirement of delivering 10% additional Biodiversity Net Gain over and above that lost to the development proposed, how is this to be achieved in an area formally designated as green belt? What strategies are in place to provide the equivalent categorised habitat and necessary green space within the area neighbouring the proposed development?	<p>See previous responses regarding delivery of BNG on phased application allocations.</p> <p>Small sites do not include development parcels as identified in the documents. The emerging BNG SPD will provide further clarity in terms of ensuring provision.</p>
	1.3.11 What infrastructure is being put in place to facilitate the development – it is totally unclear in the SPD's? The Garden Community proposals seem to fall down when considered against NPPF Para 73.	The SPD provides appropriate additional guidance on how the Garden Community will be delivered, including infrastructure delivery (see paragraph 6.2) and the approach to the use of developer contributions including the roof tax and other section 106 obligations (see paragraphs 6.3 and 6.4 and Appendix 1 of the Masterplan. Individual section 106 agreements will need to reflect this guidance.

	<p>1.3.20 How is this to be implemented? Will the council not adopt the open spaces and streets? If not, at what point are the infrastructure and community assets handed over or built following completion of one or all the various areas of development?</p> <p>1.3.27 Will the location and topography of the development in relation to the town centre not deter people from walking or cycling and actually discriminate against those members of the community less able?</p>	See chapter 7 for detail in response.
	<p>The text must reference mandatory use of SUDS from 2024 . The regulations and processes for the creation of sustainable drainage systems at new developments will now be devised, through the implementation of Schedule 3 to the Flood and Water Management Act 2010.</p>	<p>The Flooding and Water Resource Management chapter of the Local Plan provides the policy framework. Specifically, Policy CC3 - Water Resource Management refers to the use of sustainable urban drainage systems. Any planning application will therefore need to be in conformity with these policies - it cannot go further or introduce policy.</p> <p>Phased applications will be accompanied by a Drainage Strategy (Surface Water and Foul Drainage Assessment). The Council's Drainage Team and the Environment Agency have been consulted as part of the SPD consultation process and will be as phased applications are submitted.</p>
	<p>Page 11-12</p> <p>1.4.8 What investment is being made in other areas of Calderdale? The southeast area seems reasonably affluent compared to other areas so why is there a need to pour an 'unprecedented capital investment' into the southeast when other areas would benefit more?</p>	<p>The Council's spatial development strategy was discussed at the Local Plan hearings along with its approach to supply.</p>
	<p>1.4.9 Where it states that individual parcels are expected to conform to the design code, this should state 'must'?</p>	<p>Throughout development of the masterplan and design code documents, careful consideration has been given to the choice of wording and the implications this may have. The Calderdale Local Plan is ultimately the policy framework upon which these documents are based, any planning application will therefore need to be in conformity with these policies - it cannot go further or introduce policy or reduce the flexibility that a policy</p>

		often provides. A delicate balance must be achieved in providing supplementary guidance and avoiding producing a rigid set of parameters that results in an unusable document that could in turn stymie delivery of the Garden Community.
	1.4.12 When will the additional SPDs be completed? Noting the importance placed within the document on BNG and climate resilience, surely these must be in place before any submission is made for the development of parcels of land?	See above response regarding suite of SPDs in conformity to advice in the Garden Community SPDs.
	<p>Vision and Core Objectives</p> <p>Please read our previous comments made on the Design guidance SPD. We reiterate</p> <p>Underpinning the ethos:</p> <ul style="list-style-type: none"> • ‘Retain and enhance ecology’ appears a bit conflicting when it is greenbelt that is being removed to facilitate the development. • Working with the topography does not seem to have been thought through in terms of accessibility when aligned with active travel. • What does embedded in the DNA of Calderdale mean? • Define day to day facilities? We question the viability of the local convenience store with Woodhouse Stores close by. Has this been assessed? <p>Where are the objectives? We can only see principles. Are these the core objectives? These do not seem to be adequately developed in the 2 pages!</p>	See above responses – duplicate comments.
	<p>Constraints and Opportunities</p> <p>Please read previous comments made on the Design Guidance SPD</p> <p>Page 17</p>	See comment regarding Landscape and Visual Impact Assessment.

	3.1.3 Does the site not fall steeply to the north where the fields and scout facility drop away to the River Calder? The settlement of Clifton will be lost from view once swallowed up by the Clifton Garden development/Economic Zone.	
	The description of the topography is limited to the site and does not include the surrounding areas which will impact on the accessibility of the area to the wider town.	This particular section focuses on site constraints. Wider impacts and considerations will be taken into account.
	The existing access routes, Firth House Lane and Shepherds Thorn Lane, are both single lane and will need to be retained in full to allow access.	Noted.
	<p>Page 18</p> <p>The plan indicates the boundary to existing dwellings as a hatched area which would indicate some sort of screening which is not reflected in the text on the adjacent page. This is misleading.</p> <p>The hedgerow lined access routes and PROWs are not hatched as the Wildlife Habitat Network but these are important linkages which should be highlighted</p>	The plan indicates the location of the boundary with the existing dwellings to highlight areas where careful consideration is required.
	The Bradley Park Dyke waterway is hidden by the site boundary.	The waterway is clearly labelled.
	<p>3.2.2</p> <p>The new primary school does not show how it will be serviced.</p> <p>How will vehicle numbers be restricted on Ryecroft Lane?</p> <p>There is no mention of the surrounding roads and the current congestion caused by parked cars and limited visibility.</p> <p>Reference is made to restricting the numbers of vehicles from Ryecroft Lane and Woodhouse Gardens. We welcome this but fail to see how you are imposing this. Both wider and local highway issues need to be adequately assessed to define this. This must include assessing on-street car parking.</p>	Design/ layout of phased developments will encourage use as providing the most attractive route.

	Both Woodhouse Lane and Daisy Road are single vehicular access when cars are parked on the road. Ryecroft Lane and Woodhouse Gardens are accessed from these roads.	The presence of parked cars on roads such as Daisy Road has been considered in terms of visibility and delays to traffic.
	<p>There is no mention of the weight restriction on the railway bridge (7.5T) which will impact accessibility during both construction phase and the serving of the development once completed. All heavy vehicles would have to access via alternative routes (Woodhouse Lane, Daisy Road, Ryecroft Lane and Woodhouse Gardens) which are all totally unsuitable and impractical; unless the new spine road from Huddersfield Road is built as part of phase 1.</p> <p>The turning head on Ryecroft Lane is only there due to the road being a cul de sac.</p>	<p>There will be physical restrictions preventing the number of dwellings served off Ryecroft Lane and Woodhouse Gardens. Details of such measures and the point at which they will be required will be dependent on the phase specific transport assessments.</p> <p>During the Local Plan Examination process, the Local Highway Authority indicated that, in principle, the site is capable of being safely accessed and that related off-site highway mitigation measures could be achieved. Initial masterplans showed the main access would be provided via the A641 with secondary accesses off Ryecroft Lane and Woodhouse Gardens.</p> <p>The Planning Inspector noted that future Transport Assessment work associated with phased planning applications will provide an opportunity to explore access and mitigation measures in more detail. The Inspector was however satisfied that safe access to the site is capable of being achieved and that in order to be effective Appendix A should be amended to refer to the provision of main and secondary vehicular access points.</p> <p>Discussions have been held with the developers regarding construction vehicle access. They are aware of local restrictions including the weight restriction on the Birds Royd Lane bridge.</p> <p>See above response regarding construction traffic and consultations with Environmental Health.</p>
	The proposed sports field and park area, which is an existing cricket ground, has one of the main vehicular access routes	The design of the access and surrounding land will be firmed up at phased planning application stage, based on advice contained within the Local Plan and SPDs.

	running through it. How does this provide a safe play and sports area?	
	Bullet point 9 'Potential for Shepherd's Thorn Lane' does not make sense, either missing text or punctuation. How would this be achieved and still allow the regional scout facility to operate and an arboriculture business that is located in the woods.	Agree to amend the current wording of bullet point 9 to say: "Potential for Shepherd's Thorn Lane to be closed to vehicular traffic from Woodhouse Lane once alternative vehicular access is provided via new junction on A641 Huddersfield Road."
	The proposed cycle routes traverse the most challenging topographical areas and would not be easy routes to cycle. The cycle route northwest to south east does not exist as an accessible route. Huddersfield Road is not a safe cycle route.	Agree to change proposed employment areas shown in Kirklees to residential in line with Bradley Park housing development. While the comments are outside the scope of this SPD consultation, the A641 Corridor Improvement Programme does include improvements to Huddersfield Road.
	What access is being provided for the primary school and local centre? There is no indication of how these would be serviced.	Details will be confirmed at planning application stage.
	The potential for improved linkage (brown arrows) crosses the railway line. There is no current access route through.	The plan indicates that in the future, there may be opportunity to explore provision of an active travel route through the railway underpass.
	There is no buffer planting indicated on the plan to the north of the site to provide screening for the existing properties. The privacy, amenity and lifestyle of the existing property owners along the boundary, backing onto/facing the site, must be maintained and protected. In general, we believe this will be best achieved by a rich, ecological, wildlife buffer rather than gardens backing onto gardens. This would also be in keeping with the 'garden community' approach and protect vital bat transect routes that connect to the hedgerow lines. In some instances a deviation from this may be required when we have sight of the more detailed planning application proposals.	All new development within the Garden Community will need to demonstrate that it would not result in any significant adverse impact on the living conditions of existing adjacent residents or other occupiers with regard to privacy, daylight and over-shadowing in particular. It must also provide acceptable living conditions for future occupiers in respect of privacy, daylighting and private amenity space. Further guidance standards on privacy, daylighting and amenity space can be found at Annex 2 - Space About Dwellings of the Calderdale Local Plan. The guidance includes recommended space standards that will be applied in assessing residential development proposals.
	The proposed employment areas to the south in Kirklees (in yellow) appear to be on the existing golf course. This is the Bradley Park housing site – not employment!	As noted previously – the Council agrees to change the proposed employment areas shown in Kirklees on Site

		Opportunities plan to residential in line with Bradley Park housing development.
	4. Key Principles Various spelling mistakes exist within the text 4.1.2 The mosaic of habitat and spaces does not seem apparent from the plan shown. Most of the open space/habitat is to the south of Bradley Park Dyke. There is no framework to show how the plan has evolved and how it works across the site. Why has this not been provided?	Detail not required for plan of this nature – see following plans along with detail in the nature chapter.
	4.1.3 The school footprint and playing fields appear to encompass a much greater area than shown in the previous plan ‘Site constraints and opportunities’.	The site opportunities plan provides a potential location. The masterplan framework provides the additional detail which will be then developed further as the proposals develop and the application is submitted.
	4.1.4 There is no existing park as indicated. This area is open grassland with some spoil from previous development.	See previous response regarding potential upgrades to the Council-owned land as part of the access proposals.
	There is no buffer shown between the existing community and proposed development as shown in the site constraints plan. The school and playing fields are sited on one of the steepest and highest parts of the site. How is a level playing field and accessible school to be developed in this location?	It is necessary to flag these critical relationships as a site constraint, the detail will be provided at application stage, in accordance with the relevant policies of the Local Plan as highlighted above.
	What are the green spaces between the parcels of development? Will these become streets or remain as grassed areas or scrub woodland? The existing woodland and trees do not seem to be correctly shown.	See Network of Spaces section of the design code for additional detail and explanation.
	Page 21-22 Key This does not align with the adjacent plan as noted below. <ul style="list-style-type: none"> Where is the secondary local centre. This is not easily visible. We have noted on other plans it’s shown in two different places 	The majority of these comments stem from the fact that the key is misaligned by one, resulting in a lack of clarity. Some of the lines are also not quite as clear as they might be. Worth noting that the key to the same masterplan on page 7/8 in the Design Code is correct.

<ul style="list-style-type: none"> • What is the multifunctional greenspace? Is this grassed areas or woodland? What access is actually available to these areas as some are used for farming? • Parks and Garden have the same colour as the existing trees/woodland/hedges? • Waterways are shown as trees in the key. • There is no secondary road shown. • The primary access is from a point previously shown only as a potential access point. • The secondary road arrow is solid and not dashed as the plan. • There appear to be no primary active travel routes. What are these defined as? • What are secondary active travel routes defined as? • Are all existing PROWs, shown in orange dashed lines, to be removed as sonly purple dashed routes are to be retained or re-routed? • Are the orange PROWs proposed or will they be streets? • The school access and turning head is not shown. • How is Shepherds Thorn Lane to be closed to vehicles and still retain access for the existing residents? • What is the purple solid line and arrow north of the school area? This notation seems to refer to Shepherds Thorn Lane <p>4.2</p> <p>4.2.3 The use of language such as school drop off and associated parking contradicts with the emphasis on active travel routes and cycling and walking.</p>	<p>The way that the PROW is identified is not as clear as it should be and needs to be amended.</p> <p>As noted above, the closure of the top section of Shepherd's Thorn Lane can only happen when new vehicular access via the A641 Huddersfield Road has been provided.</p> <p>Various actions agreed:</p> <ul style="list-style-type: none"> • Update the key to ensure that it is correct and amend the line styles and colours on the masterplan as required to ensure clarity. • Amend the key to say: "PROW to be retained." • Delete the line style and key saying: "PROW to be retained/re-routed" as none are shown on this plan. • Amend the key to say "Shepherd's Thorn Lane closed to vehicles and converted to primary active travel route (after completion of Primary Street)" • Change "Primary Road" and "Secondary Road" in key to "Primary Street" and "Secondary Street" for consistency with rest of document and Design Code. <p>Note: same applies to the masterplan in all four documents.</p>
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	4.2.4 This is the first time SUDS is mentioned within the document. Is 'on street' parking not conflicting with the emphasis on active travel? There appears to be conflicting messages.	Annex 1 - Car & Bicycle Parking Standards of the Calderdale Local Plan establishes the Council's car and bicycle parking standards. The supporting text also explains the reason for the Council's approach and the move away from maximum parking standards at residential properties.
	4.3 4.3.2 There is no secondary road shown which limits the understanding of the text and plan.	The plan is provided to demonstrate the approach to building heights and density, other information has been limited to enable clear and understandably interpretation.
	4.3.3 As the site is being divided into separate parcels for development is this a way of attempting to circumvent the need for a landscape visual assessment (LVIA)? Should not this be done as part of the masterplanning prior to any division of land into development parcels? Landscape and Visual Impact Assessment (LVIA) must be provided not maybe – due to impact from long distance views on M62 approach. This MUST be done now to inform the design principles.	See previous response regarding the requirement for a Landscape and Visual Impact Assessment. Amendments to wording agreed to ensure clarity.
	4.3.4 and 4.3.5 The density description appears to show the development parcels with the greater density are those closest to the existing infrastructure. These would be constructed first putting greater pressure on the existing infrastructure. We have already indicated that densities against the existing properties needs to be lower.	Section 4.3 of the document outlines the approach to building heights and density.
	Densities are higher than the low densities we have been sold for a garden community. The local plan indicates 28 dph and the masterplan now indicates 30 - 40plus. Is this because large parts of the site are not actually available for housing. We have reiterated this throughout the Local Plan process. We are now left with higher densities to keep the numbers up not the low density, garden community promised and sold to us.	The overall indicative developable area used to calculate the density in the Local Plan was based on constraints such as heritage and ecology. It did not take account of the land required for non-residential uses, such as education, the local centre and open space.
	4.4	Paragraph 4.4.1 defines what a landscape strategy does.

	<p>4.4.1 What does this mean and what is the landscape strategy? There is no content to define what this is or what these spaces are.</p> <p>4.4.2 The playing fields appear to be directly linked to the school. Why would these be the focal point for the whole development? What use would there be outside of school hours and holiday periods if the school is shut?</p>	<p>All facilities including the public open spaces, play areas, pitches, community centre and associated activities will be open to all residents, both new and existing.</p>
	<p>4.4.3 There is no existing park. This is an area of wasteland with contaminated spoil.</p> <p>4.4.4 The community orchards do not appear to be in the best locations for accessibility but rather areas not suited for house building. Providing such a space adjacent to the listed building would not be in keeping with the listed building and curtilage. Providing community growing to the east on the steep slope adjoining the existing ancient woodland would also not be the best site. Again, we question if these are the best locations for these important elements, or are they just crowbarred into otherwise unused land to try and meet the required open space requirements?</p>	<p>See above response regarding potential upgrades as part of access proposals.</p> <p>The Council's Conservation Team and Historic England have been consulted throughout the Local Plan process, in the formation of this SPD and will also be on submission of phased planning applications. Historic England have welcomed the inclusion of the validation requirement to prepare a site-specific Heritage Statement or Heritage Impact Assessment (as appropriate) and Archaeological Appraisal.</p> <p>The impact of this proposal on the Wildlife Habitat Network and ancient woodland needs to be considered.</p>
	<p>4.4.5 From the previous plan, it would appear the existing PROWs are being removed so the description is void. How are the existing hedgerows to be protected once the developers commence construction and seek access to the various parcels of land? Surely all planting is naturalistic? The emphasis should be on native species and ensuring the most biodiversity for the area?</p>	<p>See range of previous comments including reference to Local Plan policy, the approach to existing trees and hedgerows and BNG requirements and strategy.</p>
	<p>Key and Plan</p> <p>Where are the indicative incidental green spaces? The icon does not reflect the plan. Have these been applied in line with the Fields In Trust Guidance for Outdoor Sport and Play: Beyond the Six Acre Standard? What is the hierarchy of these</p>	<p>The indicative location of incidental green spaces is marked on the plan on page 25.</p> <p>As highlighted in Appendix 1 – Site Number LP1451 – Land between Bradley Wood and Woodhouse Lane, Rastrick of the</p>

	<p>spaces? Where is the strategy to show how this will be delivered across the whole site?</p>	<p>Local Plan, provision of Open Space on the allocation will be above policy requirements. The specific breakdown of phase-by-phase typology requirements, and total provision, is indicated in the Development Guidelines section of the SPD.</p> <p>Specific detail of provision (within each typology) will be in accordance with the guidance provided in the SPDs and determined at the time of each phased application in consultation with the Council's Open Space Team.</p> <p>The Council's Open Space Team will provide advice on phased applications based on up to date, relevant guidance available at the time of submission.</p>
	<p>Why is the village green not in the centre of the garden community as the focal point rather than playing fields or a shop?</p> <p>Providing an arrival space adjacent to the secondary access point would indicate this would become a primary route.</p>	<p>The village green will be a key component in creating a sense of arrival to the Garden Community.</p>
	<p>Are the playing fields for public use, for the school or both? How will this be effectively delivered on sloping land?</p>	<p>See above response for explanation and detail.</p>
	<p>It confirms there will be Public open space deficiencies. Throughout the process we have been told this will not be the case. This will generate unsustainable movements not the contained, sustainable settlement promised. We have repeatedly advised that there were deficiencies. We have already raised the inadequacies of the proposed LEAP provision.</p> <p>You state that open space provision is higher than requirements but this contradicts the fact there are deficiencies or whether that shown is actually publicly accessible open space. What assurances have been made by all landowners to confirm that all the land for open space shown is available?</p>	<p>While it is the intention for all open space to be provided on-site, the open space schedule indicates a policy shortfall in terms of playing pitch and sports provision. In line with Local Plan Policy GN6 (Protection and Provision of Open Space, Sport and Recreation Facilities) therefore, the Council will expect a financial contribution to be made to enable the creation or enhancement of facilities in the local area. The level and nature of the contribution will be managed through S106 agreement(s).</p> <p>The overall open space provision is considerable higher than Local Plan policy requirements.</p>

	<p>4.5 Access and Movement</p> <p>This does not seem to address the wider issue of how active routes link into the existing travel infrastructure and whether people would be willing to negotiate this once out of the garden community.</p> <p>4.5.2 Who will instigate the bus service? Which parcels of land for development would trigger the need for this?</p>	<p>Chapter 5 of the Design Code SPDs provide detailed information on the access and movement strategy that will underpin delivery of the allocation, including key design principles and high-level specifications. Appendix 1 of the Draft Woodhouse Garden Community Masterplan SPD provide an indication of the probable s106 requirements for phased applications and include reference to off-site highway improvements and active travel connections beyond the red edge of the application.</p> <p>Appendix 2 - Validation Requirements of the Draft Woodhouse Garden Community Masterplan SPD include reference to a requirement for Travel Plans which will detail the long-term management strategies for integrating proposals for sustainable travel into the planning process. Plans will be based on evidence of the anticipated transport impacts of development and establish measures to promote and encourage sustainable travel within the site boundary and beyond.</p> <p>In addition, existing Rights of Way are identified as site opportunities in the documents and are highlighted as providing key connections between the existing residential areas and the countryside beyond. These must be considered and incorporated within phased development proposals.</p> <p>Discussions have been taking place regarding the requirements for bus provision.</p>
	<p>4.5.3 What does the mobility hub mean? This appears to be a woolly description with no substance.</p>	<p>Mobility hubs bring together shared transport with public transport and active travel in spaces designed to improve the public realm for all.</p> <p>The concept is increasingly spreading in the UK and will complement the ethos of the Garden Communities in providing active travel and enhanced connections.</p>

		While the contents of the mobility hubs are yet to be finalised, provision will be based on CoMoUK guidance
	<p>Key</p> <p>The line types and colours used do not reflect those on the plan and make the reading of this section difficult and confusing.</p> <ul style="list-style-type: none"> • Primary and secondary access icons are indistinguishable from each other. • The primary street does not appear on the plan as the key. • Which areas are to have restricted vehicular access? This is not apparent from the key and line types used. The secondary access notation does not seem to match the colour either. • If some areas are to have restricted vehicular access, why are they designated as secondary access points? This does not appear to make sense. • How can Shepherds Thorn Lane be closed to vehicles and still provide access to the scout community, business and residents? • Who will fund the off-site cycleways beyond the site boundary? The developers? • How will the off-site proposed quiet street be enforced if outside of the development area? What is a quiet street? • The PROWs shown on this plan appear to contradict those shown on the key design principles plan. • What does the bus stop icon mean? There is none shown on the plan. 	<p>Agree that the key needs to be reviewed to check that the line styles align with those on the plan.</p> <p>The “Restricted vehicular access” refers only to the two bus turnaround areas. These should be renamed for clarity. The secondary access points are not also restricted access.</p> <p>Refer to previous responses in relation to Shepherd’s Thorn Lane.</p> <p>Various actions agreed:</p> <ul style="list-style-type: none"> • Revise the line styles in the key as required to correctly match those in the plan. • Rename “Restricted vehicular access” as “Bus turnaround facility (if required)” • Add clarification to “Proposed off-site quiet streets” (and “proposed off-site cycleways”) saying where information can be found? • Amend PRoW as required to ensure clarity. • Bus stops to be added to plan in line with those shown on page 49 of the Design Code. Caption to be revised to say: “Indicative proposed bus stop”.
	<p>Development Guidelines</p> <p>5.1 Introduction</p>	See above responses concerning both residential amenity and building heights.

	<p>5.1.4 Residential amenity needs to be reflected in the buffer between existing residents and the proposed development. Providing screening should not impact on daylight and overshadowing of properties.</p> <p>Building heights must be restricted to 2 storey around existing building in and around the site</p>	
	<p>5.2 Housing</p> <p>5.2.1 Explain what SHMA means. Members of the public do not know what this is? Is the 2018 SHMA the most up to date guidance? What local housing needs assessment has been undertaken to verify local need?</p> <p>It is good to see housing needs/requirements have now been taken a bit more seriously rather than focusing on the larger properties. This will of course affect the viability of the site.</p>	<p>The Council is due to undertake a “refresh” of parts of the SHMA that will amongst other things look at size of homes needed across the Borough in 2023. Furthermore, it is expected further studies will take place in the lifetime of the development and can be used to inform individual planning applications.</p> <p>Local Housing Need was discussed at length at the Local Plan hearings and is therefore outside the scope of this consultation.</p>
	<p>We support the use of local small and medium enterprise builders on the site. This will help to support local builders and economic growth in Calderdale. However, how feasible is this. We note that this is on the land where ownership is not currently established. This will be problematic and the claim that this will achieve building at speed is therefore doubtful.</p> <p>Please verify who owns this land.</p> <p>In line with the Custom/self-build SPD for sites over 100 homes, we agree 5 % of land for serviced plots should be provided on each phase to assist those looking to build their own homes.</p>	<p>See above clarification regarding the unregistered land.</p>
	<p>5.2.3 We welcome the requirement to provide older peoples accommodation and to HAPPI standards. However, the site will fall woefully short of this without the right mix of facilities in the local centre (ie health provision) and lack of public transport especially given its distance to the town centre.</p>	<p>Noted</p>

	How does this align with the emphasis on active travel and locating the garden community away from the town centre?	See above comments on active travel connections up to and beyond the red edge boundary of the site.
	The overall site must also adopt dementia friendly design principles to achieve an inclusive community.	<p>A key ethos of the Garden Community, as derived from the TCPA's Garden City Principles, is that of an inclusive neighbourhood. This refers to accessible, affordable and liveable neighbourhoods for all members of society.</p> <p>The borough-wide Placemaking SPD, which will be a material planning consideration once adopted, includes specific reference to dementia friendly places (Section 6.2 – Inclusive Design).</p>
	<p>5.3 Local Centre</p> <p>We agree local facilities should be provided in a central location. However, no assessment appears to have been done to establish what the proposed uses should be or how feasible they are. Delivery of the shop/café is dependent on a third party. There is a real danger this will not materialise without a more robust requirement for delivery. This was to be funded by the developers. Delivery is in question without a more robust requirement on developers.</p>	<p>The need for more certainty relating to the delivery of key items of infrastructure is acknowledged. As such, the phasing strategy of the SPD will be amended to ensure further clarity.</p> <p>Discussion with landowners and developers, including looking at market demand and other successful examples across the UK based on experience of masterplanning team.</p>
	There is a community room available in the Bradley Wood Scout camp which can be hired. Is this duplicating what is already there in close proximity and not developing sustainability in existing provision. Have conversations been held with the scout camp. It should be noted that the Bradley Scout Camp may not be accessible on foot for some other than by car.	See above comments regarding scope and methods of public engagement.
	<p>5.4 Education</p> <p>The documents do not reference or address the need for secondary school provision, how this will be delivered or access arrangements to and from the site. Whilst this might be off site it still has a bearing on a well-designed place. The</p>	Significant changes in preferencing patterns have occurred which has resulted in far fewer extra district pupils seeking provision within Calderdale. This has released capacity in the Lightcliffe area. Developments in neighbouring Kirklees have also been delayed. Additional capacity will only be provided if

<p>Local Plan refers to this in sections 16.63 to 16.69 and specifically states:-</p> <p>16.64</p> <p><i>The Council considers that social infrastructure is a key consideration for the Local Plan. Part of the function of spatial planning is to orchestrate infrastructure and to facilitate service providers knowing where new development is likely to come forward so that they can make their capital programmes fit with the anticipated growth. For some areas, such as Brighouse, where significant growth is anticipated, plans are already part of the process to identify potential sites for two new primary schools and a secondary school as part of the Garden Suburbs proposals.</i></p> <p>16.66</p> <p><i>The Infrastructure Delivery Plan (IDP) sets out the social and physical infrastructure necessary to support the development identified in the Local Plan.</i></p> <p>16.69</p> <p><i>More specifically, within the Brighouse Local Plan Area, particular transport and education infrastructure schemes have been identified that must be delivered at the appropriate point in the Plan period to mitigate the impacts of development. These infrastructure schemes include two 2-form entry primary schools; additional secondary school places; and transport interventions comprising elements of the A641 Corridor Improvement Programme. Based on the assumption at the time of writing that there will be a DfE funded secondary school in South East Calderdale, the developer contributions will be approximately £35.24 million. These costs will be divided amongst the developments on allocated and windfall sites within the Brighouse Local Plan Area during the life of the Plan.(26)</i></p>	<p>required and will be based upon need (not demand) at the time that developments are in the delivery stage.</p> <p>Calderdale Council retains a statutory duty to commission school places and ensure that there are sufficient school places in the right areas to meet the needs of the local population. The Council produces a 'Planning for School Places' document annually, highlighting projections for pupil place need in each area of Calderdale showing existing school places alongside the anticipated new demand for places.</p>
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	<p>16.70</p> <p><i>The mechanism for delivering these contributions will be through planning obligations, secured through legal agreements at the stage of individual planning applications.</i></p> <p>Note: Our underlining</p> <p>It was confirmed before the Inquiry ended that the free school was not going ahead. You told the Inspector the plan for secondary school provision would therefore revert back to the extension of existing secondary schools.</p> <p>The need for secondary school provision was pushed back to later in the plan period to align with the Garden Community start of 2027/8. The Department of Education letter about the free school decision to Robin Tuddenham dated 8 August 2022 (secured under FOI) was misquoted to the Inspector by omitting the reference to 6 years. The correct version is provided below:-</p> <p><i>“because while some local secondary schools are expected to be oversubscribed, others have significant numbers of surplus places: the data demonstrates that the 3 secondary schools located closest to the proposed site for the free school (Brighouse High School, Rastrick High School and Lightcliffe Academy) are projected to have an overall surplus of Year 7 places for 6 of the next 10 academic years, with the biggest shortfall in any of the other years being 22 places”</i></p> <p>The development of the two Garden Communities will without doubt result in the need for secondary school provision (circa 3000 new homes) especially since there is a shortfall from 2028 as indicated above.</p> <p>Given Redrow is now seeking to start earlier than the agreed trajectory on the Woodhouse Garden Community, the need for secondary school place is consequently also brought forward as demand will be earlier than anticipated. It is therefore critical</p>	
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	<p>to understand the impact of both Garden Communities on school provision (secondary, primary and early years) to ensure adequate mitigation is in place and to define equalisation of costs between the multiple land owners/developers.</p> <p>The SPD needs to assess the following:-</p> <ul style="list-style-type: none"> • The education needs arising from development, based on up-to-date pupil yield factors. • The capacity of existing schools that will serve development, taking account of pupil migration across planning areas and local authority boundaries. • Available sources of funding to increase capacity where required. • The extent to which developer contributions are required and the degree of certainty that these will be secured at the appropriate time <p>New guidance published in August 2023 on Securing Developer Contributions For Education needs to be referenced and followed. Securing developer contributions for education (publishing.service.gov.uk) This provides specific guidance on the developer contribution requirements for urban extensions such as the Garden communities.</p> <p>The SPD needs to also explain how contributions will work. If the intention is that this will be addressed through the Developer Contribution SPD then this needs to be explained.</p> <p>5.4.5 Early years provision is a requirement and must be provided – this is not a ‘should’. This was agreed in the Inquiry.</p>	
	<p>5.5 Biodiversity</p> <p>5.5.12 Noting the table provided, how does the inclusion of play areas provide Biodiversity Net Gain when these areas will</p>	<p>The Environment Act 2021 amends the Town and Country Planning Act 1990. It sets out that the majority of developments will be legally required to demonstrate a minimum net gain of 10% and secure those gains for a minimum of 30 years. The</p>

	have hard surfacing or soft play surfacing around play equipment? Sport pitches also lack the diversity of habitat.	requirement to demonstrate net gains applies to all habitats within the red line, regardless of whether they are impacted or not.
	It's not good enough that you are creating a new community and now saying there is insufficient space for adequate playing pitch and sports provision. We have raised this a number of times throughout the Local Plan Inquiry. This is not a sustainable solution and will generate traffic movements to access provision and falls short of the 'garden community' ethos you are promoting.	<p>While it is the intention for all open space to be provided on-site, the open space schedule indicates a policy shortfall in terms of playing pitch and sports provision. In line with Local Plan Policy GN6 (Protection and Provision of Open Space, Sport and Recreation Facilities) therefore, the Council will expect a financial contribution to be made to enable the creation or enhancement of facilities in the local area. The level and nature of the contribution will be managed through S106 agreement(s).</p> <p>Please note that the overall Open Space provision will be over and above policy requirements.</p>
	<p>5.6 Drainage</p> <p>How is this to be implemented across the entire site when the land is divided into parcels for development? Given the topography of the site, will the separate parcels provide the infrastructure for the parcels above to transport the surface water runoff?</p> <p>Page 38 The principles of development are not referenced correctly. The PROWs bullet point appears to contradict previous mentions where PROWs are amended or removed.</p> <p>Where is the strategy to ensure effective drainage of the site? You cannot do this on a phase by phase basis otherwise drainage is not adequately considered on a site of this size. This MUST be addressed.</p>	<p>The Drainage Strategy (DS) will be developed with the parcels of land in mind, so that surface water from each parcel will be collected, and sufficient storage for the design flood event (plus an allowance for climate change and urban creep) provided, in agreement with the DS consultant.</p> <p>Discussions with the DS consultant highlighted the phased approach and drainage connections and outfalls will be provided to link initial phases to the ultimate outfall, this was highlighted to be Bradley Park Dike to the east of the site, which drains into the River Calder.</p> <p>The LLFA are awaiting the finalised DS for the whole site however initial talks with the consultant have been productive and are expected to be in line with the comments raised. The whole site drainage will be addressed before any individual detailed site drainage plan.</p>
	5.7 Transport and Highway Infrastructure	The Planning Inspector noted that future Transport Assessment work associated with phased planning applications will provide

	As we well know the A641 scheme is now significantly different and does not include the mitigations outlined in the Transport Assessment submitted to the inquiry. It is imperative that a new one is prepared to identify what mitigations are required. The 680 initial dwelling trigger (defined in the IDP Transport Assessment – surely a conflict of interest) rested on the provision of the access at the eastern end of the site and 2-way Huntingdon Bridge neither of which are being delivered.	an opportunity to explore access and mitigation measures in more detail.
	You are now suggesting the plan will be delivered on a phase by phase development and you state it may not achieve the homes if mitigations are not in place. You have misled the Inspector and there is a strong probability we are heading for a partial completion of the site.	A Transport Assessment is a validation requirement as stipulated in Appendix 2 - Validation Requirements of the Draft Woodhouse Garden Community Masterplan SPD .
	<p>You state both allocations need to properly consider the impact of developments on the strategic road Network and traffic flows and that contribution will be needed to the schemes in the IDP. Contrary to this, you then just leave delivery to a wing and a prayer stating:-</p> <p><i>“Given the constraints on parts of the network around Brighouse town centre, in the event of any delay to the delivery of these key interventions, there may be a need to restrict the number of dwellings that can be occupied in later development phases. This would be informed by the capacity assessments. In this context, Calderdale’s multi-modal traffic model would be the most appropriate tool to assess the network impact as it includes committed infrastructure schemes and approved significant developments”. (Our highlighting)</i></p>	The Inspector acknowledged in her report on the Local Plan that the details of the A641 scheme are evolving, and that investigations to provide an alternative options were being undertaken, and Appendix 1 – Site Number LP1451 – Land between Bradley Wood and Woodhouse Lane, Rastrick is accordingly flexible in this regard.
	The A641 scheme has no approved full business case although we know the key elements relating to the garden community sites are now stripped out. There is no up to date transport assessment to verify the trigger point for mitigation is 680 dwellings. There is no proper assessment of impact or	The modelling details are set in the Technical Notes contained in the “Evidence Base: transport” page of the Local Plan webpages. These include a Local Model Validation Report.

	<p>confirmation of traffic flows to verify the impact on the strategic and local highway network or impacts beyond. Indeed your traffic modelling underpinning the whole plan is to go before a Judicial Hearing as there is a case to be heard. The inspector pushed these decisions onto the masterplanning stage and onto you to resolve and you are yet again failing to address them. The traffic impacts of these strategic sites MUST be addressed now through the masterplanning process to be compliant with your own Policy IM7.</p>	<p>The cumulative impact of developments was assessed at a strategic level for the Local Plan as is standard practice. A multi-modal model has been produced and has been made available to developers to assess the impact of their phases of development.</p>
	<p>We agree with priority for pedestrians/cyclists. This will be addressed within the garden community site. However, connections from and beyond the site have poor, inadequate footways, no cycle way, on street parking and steep topography. The A641 Corridor proposals have indicated that Daisy Road will become a quiet road – although this may have now been moved to Stratton Road. The A641 will need to verify this. Has this been considered and how can both be achieved?</p>	<p>As is standard practice each phase will take account of any approved developments at that time.</p>
	<p>The concept of walkable now appears to just relate to facilities on site? What is different about this community? I think most of us would walk to those anyway but have never bothered to say that. The concept of the garden community was sold on Brighouse being in walkable distance which it isn't. That has not been addressed. We will still need to access shopping, doctors, dentist, leisure centre and larger park facilities in Brighouse which is NOT walkable. This is not a step change at all.</p>	<p>As explained at the Local Plan hearings, strategic modelling has been undertaken of the impact on infrastructure. Further, more detailed modelling will be required with the planning applications to determine whether there is a need for capacity improvements.</p> <p>Chapter 5 of the Design Code SPDs provide detailed information on the access and movement strategy that will underpin delivery of the allocation, including key design principles and high-level specifications. Appendix 1 – Site Number LP1451 – Land between Bradley Wood and Woodhouse Lane, Rastrick of the Masterplans provide an indication of the probable s106 requirements for phased applications and include reference to off-site highway improvements and active travel connections beyond the red</p>

		<p>edge of the application (including linkages into Brighouse Town Centre).</p> <p>Appendix 2 - Validation Requirements of the Draft Woodhouse Garden Community Masterplan SPD include reference to a requirement for Travel Plans which will detail the long-term management strategies for integrating proposals for sustainable travel into the planning process. Plans will be based on evidence of the anticipated transport impacts of development and establish measures to promote and encourage sustainable travel within the site boundary and beyond.</p> <p>In addition, existing Rights of Way are identified as site opportunities in the documents and are highlighted as providing key connections between the existing residential areas and the countryside beyond. These must be considered and incorporated within phased development proposals.</p>
	<p>Bus provision is a problem as without it in the early phases car dependence will become entrenched. You now confirm that it is not a practical solution anyway and admit there is no high quality bus service in walking distance. How can this be sustainable? This is truly unbelievable and totally irresponsible. There has been a total lack of understanding about how these things are delivered.</p>	<p>A package of improvements are being designed as part of the A641 scheme. These will include measures to assist buses, pedestrians and cyclists as well as highway capacity improvements at key junctions such as signalisation.</p> <p>The developers have been advised of the need to fund increased bus service provision.</p> <p>Discussions have been ongoing with the West Yorkshire Combined Authority and Transportation colleagues regarding the mechanism to achieve the improved service.</p>
	<p>8 Heritage</p> <p>Non heritage assets should also be taken into account including Toothill Green Cottage and the Upper Woodhouse settlement – barns (6-10 Ryecroft Lane) and cottages (5-9</p>	<p>In accordance with Local Plan policy, development proposals must be informed by an understanding of the significance of the listed buildings and their setting. Applications will need to be accompanied by an evaluation of the potential impact proposed schemes may have upon their significance and set out any mitigation required.</p>

	<p>Rycroft Lane). Principles should clearly refer to the non-heritage assets.</p> <p>Archaeological remains must also be referenced and be protected.</p>	<p>In light of advice from WYJS, additional assets have been listed in the heritage section.</p>
	<p>5.9 Climate change</p> <p>Noting the climate emergency, what constraints if any, are the council placing on the developers to construct the housing with the minimal carbon footprint? This is not clear.</p> <p>5.10 Social Value</p> <p>We agree with the Local Employment and Training Strategy</p>	<p>The Renewable and Low carbon chapter of the Local Plan provides the policy framework relating to developments supporting renewable and low carbon energy. These themes are developed in more technical detail in this and other emerging SPDs, specifically the Renewable and Low Carbon SPD.</p> <p>These documents are set against a national picture where planning policy and guidance is expected to be strengthened through changes to the planning system. Initiatives such as the Future Homes Standard and the ongoing strengthening of the Building Regulations will, for example, require greater levels of energy efficiency and renewable and low carbon energy to be utilised in new developments over the construction period of the Garden Communities.</p> <p>Any planning application will therefore need to be in conformity with these policies - it cannot go further or introduce policy.</p>
	<p>6 Phasing Strategy</p> <p>6.1 The phasing of the site appears to contradict the hierarchy of access proposed earlier in the document. How are the initial phases to be developed if the main primary street is not included in these works?</p>	<p>There is no requirement for the primary access to be provided prior to the first phase of development.</p>
	<p>The first two phases (over 70% of the housing) of the development appear to rely on the secondary points for access rather than the primary access and primary route through the development. How is this to be achieved with the constraints of the existing infrastructure in the surrounding area, including narrow streets, on street parking, weight limits to bridges, etc.?</p>	<p>The traffic impact of the development has been considered as part of the Local Plan modelling process.</p> <p>The detailed traffic impacts at each junction will be assessed in the Transport Assessment submitted with the planning applications.</p>

		A multi-modal model has been produced and has been made available to developers to assess the impact of their phases of development.
	Where is the phasing strategy for the infrastructure? There appears to be little thought given for the implementation of the access to the site and how to mitigate the impact of the construction process on the existing community.	<p>Applicants will be required to submit a Construction Management Plan (CMP) as part of any planning application submission. A CMP should address how adverse impacts associated with development and cumulative impacts of any other nearby construction sites will be managed.</p> <p>The design code also provides guidance relating to temporary landscape treatments, which will assist in minimising the impact of ongoing construction work and improve the appearance of undeveloped land. See Temporary Landscape Treatments section 8.1.22.</p> <p>The Council's Environmental Health Team will also be consulted as part of the phased planning application process.</p>
	The Phasing table is inadequate and no different to that provided in the Inquiry and only says what phase it will be in. This is woefully inadequate. The Government's Garden Community Toolkit is clear delivery needs to rely on "a robust planning policy framework, agreed masterplan and delivery strategy supplemented by a good governance structure, design and delivery review process, planning conditions and Section 106 Obligations to guide consistent and high-quality development". Where are these mechanisms that will ensure effective control and delivery of the communities. These are critical given the multiple ownerships. You have failed to show how this will be managed and achieved and you are leaving it to an ad hoc approach.	The response to this comment falls outside the scope of this SPD consultation, however the mechanisms include adoption of SPDs, template S106 Agreements and binding Collaboration Agreements (the terms of these agreements have been influenced by the Council having taken the advice of leading Kings Counsel).
	What is meant by the 'TBC' on the cricket pitch area and open space? The masterplan requires absolute clarity.	Wording refers to the area of Council owned land to the north of the existing cricket club. Proposals for the secondary access may include enhancements to this land, including upgrades to the land and clubhouse.

	6.1.4 Given the 11 year period of construction, what mitigation will be in place to minimise the impact on the existing community?	See previous responses concerning construction traffic, temporary landscape treatments and Environmental Health.
	6.1.5 There appears to be no maximum length of time to construct the development? Noting the disclaimer of the dependence on market conditions does this not go against the council's argument for the need for this garden community and the ability to meet the councils agreed housing requirement figures? 6.1.7 The two statements within this point contradict each other.	As with any housing development, the pace of delivery will depend on market conditions. It is not possible to impose time-limits on completion.
	6.2 Infrastructure Delivery Secondary school delivery is omitted and education is inadequately dealt with – see previous comments	See previous response.
	6.2.9 Is there not already a lack of surgeries and dentists in the existing community without adding the additional needs of the garden communities? There is no verification that this will be provided. Just a broad brush statement. What funds are committed to it? Will there be any developer contributions required?	Paragraph 6.2.8 outlines the position in terms of healthcare provision. While the possibility of provision on both sites was explored, consultation with the healthcare providers resulted in the decision being made to invest in existing facilities.
	6.2.11 When will the local centre be implemented? Without a definitive deadline, this will be delayed or knocked back to subsequent phases. Clarity is required otherwise you will create a community without the required facilities.	The need for more certainty relating to the delivery of key items of infrastructure is acknowledged. As such, the phasing strategy of the SPD will be amended to ensure further clarity.
	6.2.12 If the A641 CIP is not implemented how will this impact on the development? Noting that various projects are critical to the development, what alternatives are in place if these are not realised? As before, it is still not clear what the impact is, what mitigations are required or what the triggers actually are. You have not moved this on any further than the Local Plan Examination!	The A641 scheme has not been paused and designs are being developed. If there is a severe impact at any junction, then the development will be required to fund mitigating improvements.

		<p>The detailed traffic impacts at each junction will be assessed in the Transport Assessment submitted with the planning applications.</p> <p>A multi-modal model has been produced and has been made available to developers to assess the impact of their phases of development.</p>
	<p>6.2.13 This notes that over half of the development (680 houses) can be built without the proposed infrastructure projects being completed. How is the existing infrastructure supposed to support this additional pressure? Where is the updated transport survey work that you state is required to test how the garden communities? This is fundamental evidence required to support the Masterplan SPD's?</p>	<p>See above comments regarding the A641, Transport Assessments and flexibility in wording of the site specific consideration.</p>
	<p>6.2.14 Why is the funding strategy not included in this draft? It is fundamental to understand the implementation of the infrastructure and how this will be equalised across the site. There is no 'detailed' breakdown of the necessary funding mechanism and costs as you state to show how this will work or what the implications for developers will be.</p> <p>6.2.16 Caveats within a lot of these statements continue to dilute the authority of the document and make it meaningless in terms of a masterplan and design code to be abided by.</p>	<p>Detail falls outside of the content of the SPD.</p>
	<p>The two initial phases will not be connected until phase 3 is implemented which will mean that there is no primary street or access to and from the site. The secondary routes and access will have to support the majority of the development putting greater pressure on the existing infrastructure.</p>	<p>See above response regarding principle of using Ryecroft Lane and Woodhouse Gardens.</p>
	<p>What strategy is in place to ensure that the highway infrastructure for each phase is proportionate and able to accommodate further phases as they come online?</p>	<p>Further modelling work will be undertaken for the individual planning applications. Mitigation will be required at any junctions where there is a severe traffic impact.</p>

		The Masterplan and Design Codes will ensure that the wider site is delivered in a comprehensive manner. Pre-application meetings have been held with the individual housebuilders and their proposals adheres to these documents.
	No mention is made of off-site works requirements required for the development of the site in its entirety and that are not covered by the A641 Corridor Investment Programme. How will these be delivered/achieved/equalised? You need to be clear.	Appendix A stipulates there will be a requirement for off-site highway improvements that are not covered by the A641 scheme.
	What strategy is in place to ensure that the drainage infrastructure for each phase is proportionate and able to accommodate further phases as they come online?	See above comments regarding the approach to drainage.
	What strategy is in place to ensure that the open space/green infrastructure for each phase is proportionate and able to accommodate further phases as they come online?	See above comments regarding the approach to provision of Open Space.
	What strategy is in place to ensure that the education infrastructure for each phase is proportionate and able to accommodate further phases as they come online? The masterplan fails to address all these key questions.	See above comments regarding the approach to primary school provision.
	6.3 Developer contributions and Funding Strategy You have just outlined the type of mechanism that will be employed without substance. The masterplan needs to be underpinned by the documents showing how these will achieve the required contributions as outlined previously. Where is the roof tax document that shows what the share of costs is and how it will be calculated? This needs to cover secondary school provision and the transport infrastructure which is unknown. The mechanism as outlined is unclear and insufficient.	The SPD provides appropriate additional guidance on how the Garden Community will be delivered, including infrastructure delivery (see paragraph 6.2) and the approach to the use of developer contributions including the roof tax and other section 106 obligations - see paragraphs 6.3 and 6.4 and Appendix 1 the Masterplan. Individual section 106 agreements will need to reflect this guidance.
	We support a legally binding collaboration agreement to be signed by all landowners. This MUST be in place and provided as part of the masterplanning documentation to show all landowners are signed up to the masterplan and	See above response regarding secondary school provision. The reference to 'relevant' landowners in the SPD rather than 'all' landowners is appropriate. Requiring all landowners across the entire Masterplan area to enter into a single CA would be

	<p>there is certainty the site can be delivered in its entirety. The documentation fails to show how delivery will be achieved without this. It must then be verified at each phase when a planning application is submitted to provide a further layer of commitment to delivery.</p>	disproportionate, could stymie delivery of the wider Garden Community and would not be necessary to address the policy requirement of Policy IM7 – Masterplanning to achieve comprehensive development.
	<p>This MUST also verify the ‘off site’ work contributions that are required to bring forward the site in totality. It will not be acceptable or equitable to pass these onto the later phases of development. This could result in stymieing development as later developments become unviable and result in some owners getting away without paying for their contributions to the overall delivery of the site and the housing requirement figures not being achieved.</p>	Agreed – reference will be made in the table to off-site highway improvements (not solely those linked with the A641 scheme).
	<p>7 Stewardship Same comments as we make on page 31. Appendix 1 – Archaeological Record (HER) Appendix 2 – Line of HaHa</p>	See above.
<p>1184942 Mark and Julie Bullen</p>	<p>WOMP54 & WODC28, THMP31, THDC27 SUPPLEMENTARY PLANNING DOCUMENT CONSULTATION Woodhouse and Thornhill Garden Communities Design Guide and Masterplan 2023 Comments : Mark and Julie Bullen Our comments are made on both Supplementary Planning Documents which were read in the order published on the Portal – Design Guidance followed by the Masterplan. General Comments We are both able and experienced in responding in a professional capacity to this type of document. However, the</p>	

	<p>way they are written is not user friendly for members of the community and indeed we have struggled to understand them ourselves. They are not clear, have many mistakes and contradict each other. This has made it very difficult to respond coherently and brings into question their professionalism.</p> <p>Inadequate consultation process has been provided. The community has not been party to the first two phases of the masterplan preparation and we are now presented with a pre-defined vision and guidance that we have not had any input into developing. This is not acceptable or transparent and does not accord with Local Plan Policy IM7 IV.</p> <p>You have provided us with two very lengthy, complex documents which provide no contextual information (ie green infrastructure, drainage, open space strategy/framework plans etc)showing how the guidance has been developed for the Masterplan or how you have got to this point. This makes it difficult to comment and raises many questions.</p> <p>There are many caveats included which seem to undermine the purpose of the document and achievement of a quality development.</p>	<p>The Town and Country Planning (Local Planning) (England) Regulations 2012 require a Local Planning Authority to undertake public consultation on draft SPDs for a minimum of four weeks, and to take account of any comments received in preparing the final documents.</p> <p>Cabinet considered the draft SPD at its meeting of 7th August 2023 and authorised a four-week public consultation in compliance with regulations.</p> <p>The consultation ran from 25 August to 25 September. The vast majority of this period was outside of the school summer holidays in Calderdale. The documents were also accessible to view prior to the commencement of the consultation on the Committee webpages as the documents were approved for consultation at Cabinet on 7 August 2023.</p> <p>Many comments were received from various stakeholders on the allocation of the site in the Local Plan. The issues raised during the Local Plan preparation informed the resulting Site-Specific Considerations in Appendix 1 – Site Number LP1451 – Land between Bradley Wood and Woodhouse Lane, Rastrick and Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road, Brighouse, many of which were recommended as Main Modifications by the Inspector, and it is these on which the SPD has built.</p> <p>This SPD consultation is an opportunity for all stakeholders to make comment on the draft documents and help shape the final Masterplans and Design Codes.</p>
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		The SPD does not introduce new policy and provides further details on the principles established in the Local Plan. The Local Plan Policies and Allocations were subject to an Equality Impact Assessment.
	<p>We find it unacceptable that Redrow/IDP have issued a pre-application consultation at the same time. The planning mechanisms all need to be in place prior to submission of any application on the strategic sites. You confirm you are working with the developers so why have you allowed to happen? As yet we have no adopted guidance from which to judge the proposals. Members of the community cannot be expected to understand all this and yet you have not issued any guidance as to how all these documents fit together. Again, this is not transparent or professional.</p> <p>The Masterplan document does not comply with Policy IM7 as you fail to show how the overarching infrastructure, open space and education etc will be secured and delivered across the entire site to ensure a comprehensive approach. The requirements/contributions that are expected of developers are not clearly articulated and equalisation of costs is not adequately addressed. You leave delivery to be addressed as individual applications come forward in an ad hoc fashion. This jeopardises the later phases and consequently the delivery of the council's housing requirement figures.</p> <p>The following detailed comments are made on each SPD:-</p>	<p>While the masterplanning team has worked closely with the phase 1 developers to ensure the principles of the SPD are enshrined within the emerging schemes, the Council cannot control the developer's timescales including the decision to carry out a pre-application public consultation at a similar time to consultation on the draft SPDs.</p> <p>Once adopted, the SPDs will become material planning considerations against which any forthcoming applications will be assessed against.</p>
	<p>WOODHOUSE DESIGN CODE</p> <p>Plan comments as noted in Woodhouse Masterplan Comments above. Additional comments are noted below.</p> <p>Noted the keys to the plans for both documents differ even though the plans remain the same. Consistency is required across both documents.</p>	<p>The key on page 11 is incorrect.</p> <p>The text under paragraph 1.2.3 describing the gradient of the site is sufficient to explain the topography but suggest adding a note about the overall level change for clarity.</p> <p>The Council agrees to amend the key on page 11 to say "Existing Contours (10m)"</p>

	<p>1.1 Page 11-12</p> <p>Key - Existing contours are not shown correctly and the 1m spacing is incorrect. This would indicate a level change of 10m when it is actually 90m plus.</p>	<p>Note: same change will be made to the Thornhills Design Code.</p>
	<p>1.2</p> <p>Key - Where is the greenbelt boundary shown on the plan as indicated in the key? The ancient woodland is also part of the green belt. Why is it not shown as such?</p>	<p>The purpose of this plan is not to show the Green Belt boundary.</p>
	<p>1.2.3 The site falls from south west to north east with changes in gradient severity to the south and northeast from reading the contour shown on the plan. There is a level change of approximately 90 metres from south west to north east but this is not noted.</p>	<p>The Council agrees to amend the first bullet point under paragraph 1.2.3 to say: "The topography of the site is characterized by a relatively gentle and consistent fall from west to east of around 85m, providing far-reaching views towards Brighouse..."</p>
	<p>2.1 Page 25-26</p> <p>Where are the key linkage and nodes off the primary street to each parcel of development? These are not set out which should be an important consideration. How are the boundary treatments noted later applied if the street infrastructure within each parcel is not determined or shown?</p>	<p>This level of detail will be provided at phased planning application stage based on the advice in the Local Plan and the SPDs.</p>
	<p>The arrival spaces shown in the masterplan have been omitted in the regulatory plan. Why?</p> <p>The PROWS are not clear.</p> <p>The key does not match the plan in line types.</p> <p>The secondary hub is in different locations on other plans.</p>	<p>Agreed that the PROWs are not as clear as they could be and that there are some minor discrepancies between the plan and the key in relation to line types.</p> <p>Agreed action to enhance the clarity of PROWs on the plan and ensure that the line types on the key are consistent with those on the plan.</p>

		<p>As noted at point 100 (above), the secondary hub is in a different location on the Land Use plan on page 29, but other plans are consistent.</p> <p>Agreed action to update the Secondary Hub location on the plan on page 29 to match the masterplan.</p>
	<p>The school buildings do not relate to the local hub as shown in later plans.</p> <p>How are the parcels of development accessed if there is only one secondary road?</p>	<p>The plan identifies two secondary roads, the principle of which were discussed at Local Plan hearings.</p>
	<p>3.2</p> <p>3.2.3 The secondary hub is in a different location to the regulatory plan.</p>	<p>Agreed action to update the Secondary Hub location on the plan on page 29 to match the masterplan.</p>
	<p>3.2.4 The school was supposed to a single storey in the consultation process for the Local Plan. Why has this changed. What impact does it have on the listed Firth House hamlet and long distance views from the south? The LVIA is required to assess this.</p>	<p>The Council's Conservation Team and Historic England have been consulted throughout the Local Plan process, in the formation of this SPD and will also be on submission of phased planning applications. Historic England have welcomed the inclusion of the validation requirement to prepare a site-specific Heritage Statement or Heritage Impact Assessment (as appropriate) and Archaeological Appraisal which will inform the development proposals for the primary school.</p> <p>Appendix 2 - Validation Requirements of the Draft Woodhouse Garden Community Masterplan SPD indicates a requirement for a Landscape and Visual Impact Assessment to be submitted as part of a phased planning application. The wording of section 4.3.3 will be strengthened to ensure clarity.</p>
	<p>4.1</p> <p>4.1.7 The SuDS are shown on the edge of the areas of development and not incorporated into the design of the site. Why is this?</p>	<p>The majority of the site drains towards the east/southeast, towards Bradley Park Dike which runs along the southern boundary. The northern and western parts of the site do fall towards the existing houses. The drainage will be designed to manage runoff from this area and direct it to the proposed site</p>

		<p>SW drainage system. In consultation with the drainage strategy consultants, flows will not be directed to existing properties.</p> <p>The Drainage Strategy will be developed with the parcels of land in mind, so that surface water from each parcel will be collected, and sufficient storage for the design flood event (plus an allowance for climate change and urban creep) provided, in agreement with the DS consultant.</p> <p>Discussions with the DS consultant highlighted the phased approach and drainage connections and outfalls will be provided to link initial phases to the ultimate outfall, this was highlighted to be Bradley Park Dike to the east of the site, which drains into the River Calder.</p> <p>The LLFA are awaiting the finalised DS for the whole site however initial talks with the consultant have been productive and are expected to be in line with the comments raised. The whole site drainage will be addressed before any individual detailed site drainage plan.</p>
	<p>4.2</p> <p>The park was not included in the design code but is in the masterplan. It is critical that the masterplan effectively addresses the connections/impacts outside the red line boundary?</p>	<p>Chapter 5 of the Design Code SPDs provide detailed information on the access and movement strategy that will underpin delivery of the allocation, including key design principles and high-level specifications. Appendix 1 of the Draft Woodhouse Garden Community Masterplan SPD provides an indication of the probable s106 requirements for phased applications and include reference to off-site highway improvements and active travel connections beyond the red edge of the application.</p> <p>Appendix 2 - Validation Requirements of the Draft Woodhouse Garden Community Masterplan SPD include reference to a requirement for Travel Plans which will detail the long-term</p>

		<p>management strategies for integrating proposals for sustainable travel into the planning process. Plans will be based on evidence of the anticipated transport impacts of development and establish measures to promote and encourage sustainable travel within the site boundary and beyond.</p> <p>In addition, existing Rights of Way are identified as site opportunities in the documents and are highlighted as providing key connections between the existing residential areas and the countryside beyond. These must be considered and incorporated within phased development proposals.</p> <p>See above response regarding rights of way and connection enhancements.</p>
	<p>4.3</p> <p>4.3.1. It states the parks are to be integrated into the scheme but they are not part of the development or fall within the site boundary? How will they be delivered and who is responsible for funding these?</p>	<p>Reference is made to the area of Council owned land to the north of the existing cricket club. Proposals for the secondary access may include enhancements to this land.</p>
	<p>4.3.6 The tree species are too limited and do not reflect the current diversity of species on the existing site.</p>	<p>The wording in paragraph 4.3.6 clearly states “the species could include but are not limited to”.</p>
	<p>Page 35</p> <p>This area is contaminated and not a park. It is outside of the site boundary – comments as above.</p>	<p>The Environment Agency have been consulted in the development of the draft SPD (and throughout the masterplanning process) and have provided extensive comments and proposed modifications.</p> <p>The Environment Agency will also be consulted at phased planning application stage.</p>

		<p>Required mitigations will be informed by the more detailed survey work and will be conditioned on approval of planning applications.</p> <p>A Land Contamination Assessment will be required as a validation requirement.</p> <p>See above response on veteran and notable tree assessment</p>
	What is primary active frontage?	See paragraph 6.2.8 for full description.
	Why is the secondary street located off site? It crosses Wildlife Habitat Network. What impact will this have? Where is the ecological evidence to confirm it is acceptable as no previous assessments have been made of this land ?	The impact of this proposal on the Wildlife Habitat Network will be considered. Maintaining the ecological functioning of the Wildlife Habitat Network will be considered at the planning application stage in accordance with adopted policy in the Local Plan.
	4.4 There is no mention of inclusive and accessible play for all. The proposed LEAPS shown on plans do not appear to be within the 5 minute walking distance noted.	<p>Inclusive Neighbourhoods is a key ethos of the Garden Communities as identified in the Vision and Core Objectives Chapter.</p> <p>Open Space will be provided in line with Policy GN6 – Protection and Provision of Open Space, Sport and Recreation Facilities of the Calderdale Local Plan.</p> <p>As highlighted in Appendix 1 – Site Number LP1451 – Land between Bradley Wood and Woodhouse Lane, Rastrick of the Local Plan, provision of Open Space on the allocation will be above policy requirements. The specific breakdown of phase-by-phase typology requirements, and total provision, is indicated in the Development Guidelines section of the SPD.</p> <p>Specific detail of provision (within each typology) will be in accordance with the guidance provided in the SPDs and</p>

		determined at the time of each phased application in consultation with the Council's Open Space Team.
	<p>4.5</p> <p>The SuDS do not mention the Critical Drainage Area or CC2 relating to flood risk management.</p> <p>The SUDS shown on the plans do not appear to be fully integrated into the design and topography of the site. The water areas shown exist on the edge of the development and on land which will require extensive remodelling to hold water.</p> <p>4.5.7 Where will this discharge to the existing sewers?</p>	<p>See above comments regarding development of the drainage strategy.</p> <p>The principle of development on the site is established through the Local Plan – with strategic flood risk considered during the site allocation work. The Local Plan includes a number of policies on flood risk, and planning applications will need to comply with these. With regards to flooding, a planning application will need to be accompanied with a site specific flood risk assessment, which complies with the requirements set out in Policy CC2 - Flood Risk Management (Managing Flood Risk in New Development). Policy CC3 - Water Resource Management also requires major developments to incorporate Sustainable Urban Drainage Systems.</p> <p>Surface water will require appropriate attenuation within each phase to offset the runoff from the development, restricting the runoff rate to the pre-development greenfield runoff rate.</p> <p>Similarly, the fouled drainage will have sufficient storage for foulds and a restricted runoff rate to the public sewer system, which given the topography of the site is initially proposed to be pumped to Woodhouse Lane</p>
	<p>4.6</p> <p>The requirements for BNG do not appear to have been explicitly stated as noted in the Environment Agency's response to the design code.</p>	<p>The Environment Act 2021 amends the Town and Country Planning Act 1990. It sets out that the majority of developments will be legally required to demonstrate a minimum net gain of 10% and secure those gains for a minimum of 30 years. The requirement to demonstrate net gains applies to all habitats within the red line, regardless of whether they are impacted or not.</p> <p>Wildlife Habitat Networks in both Calderdale and Kirklees will be fully considered in a joined-up approach.</p>

	<p>5.1</p> <p>5.1.2 The bus network is contradicted in the masterplan document which states that a bus network within the site will not be possible until the site is fully developed.</p>	<p>Para 5.7.9 of the Draft Woodhouse Garden Community Masterplan SPD states that “An extended or modified E1 [minibus] service would be acceptable as an interim solution for initial phases close to the existing dwellings.” Nowhere does it say that this is not feasible.</p> <p>The developers have been advised of the need to fund increased bus service provision.</p> <p>Discussions have been ongoing with the West Yorkshire Combined Authority and Transportation colleagues regarding the mechanism to achieve the improved service.</p> <p>The Primary Road has been designed to accommodate buses, and the stop locations and pedestrian network will ensure that most residents will be within a 400m walk of a stop. The need for developer funding of bus services has been identified.</p>
	<p>5.2</p> <p>5.2.2 Why are the tertiary streets not shown? Surely these will impact greatly on the character of the garden community? If there is no understanding of how these will look, each individual parcel will be different and will not have a cohesive identity.</p>	<p>While the detail and requirements of the tertiary streets is contained within the design code, the precise locations will not be known until detailed planning application stage.</p>
	<p>5.3.</p> <p>As above 5.1.2.</p> <p>5.3.5 From the image shown, the primary street will be 15 to 20m wide. Is this correct?</p>	<p>See Primary Street Highway Features in section 5.4 for additional detail including carriageway widths</p>
	<p>5.4</p> <p>Do the development parcels allow for this extent of infrastructure and will developers be willing to fund this amount of space? Is there sufficient space within the site to provide the street hierarchy as shown? In terms of identity and the built</p>	<p>The masterplanning team has worked closely with the phase 1 developers to ensure the principles of the SPD are enshrined within the emerging schemes. Developers are aware of the likely land requirements for the key infrastructure including the need to comply with LTN1/20 highway standards</p>

	form, this view of the streetscape goes against how the local identity of Woodhouse and Calderdale looks and feels.	
	5.4.6 Only one secondary street is shown on the masterplan; how do the others work and where are they? Looking at the images shown there is no apparent difference between the secondary and tertiary streets.	<p>During the Local Plan Examination process, the Local Highway Authority indicated that, in principle, the site is capable of being safely accessed and that related off-site highway mitigation measures could be achieved. Initial masterplans showed the main access would be provided via the A641 with secondary accesses off Ryecroft Lane and Woodhouse Gardens.</p> <p>The Planning Inspector noted that future Transport Assessment work associated with phased planning applications will provide an opportunity to explore access and mitigation measures in more detail. The Inspector was however satisfied that safe access to the site is capable of being achieved and that in order to be effective Appendix A should be amended to refer to the provision of main and secondary vehicular access points.</p>
	5.6 How will these active travel routes be surfaced?	See detail in SPD including paragraph 8.2.1.
	<p>5.7</p> <p>Given the emphasis on the climate crisis, the need for SUDS and active travel, there is a lot of room given to car parking both literally and figuratively in the document. There appears to be contradictions noted in the designs and notes shown such as:</p> <p>P1c Access is only gained by going through the car port</p> <p>P2A Contrary to what was said in the SuDS about minimising the hard surfacing of the frontage, most of the front garden is parking.</p>	<p>Annex 1 - Car & Bicycle Parking Standards of the Calderdale Local Plan establishes the Council's car and bicycle parking standards. The supporting text also explains the reason for the Council's approach and the move away from maximum parking standards at residential properties.</p>
	6.1	The approach to density is outlined in paragraphs 4.3.4 and 4.3.5 of the Draft Woodhouse Garden Community Masterplan

	<p>It would be useful to show what the spread of housing would be given the density numbers shown. This could be shown on a plan to indicate what this would look like. Lower density needs to against the existing Woodhouse development.</p>	<p>SPD. The requested level of detail will not be available until phased applications are submitted. Please note that the indicative developable area used to calculate the density in the Local Plan was based on constraints such as heritage and ecology. It did not take account of the land required for non-residential uses, such as education, the local centre and open space.</p>
6.2	<p>Is it appropriate to use flats as a visual image when describing the garden community? It gives the wrong impression.</p>	<p>The selected photograph provides a good example of the use of private and shared space.</p>
7.2	<p>Should the Woodhouse centre not be in the centre where the local hub is sited in the masterplan? The area currently shown as the centre should be renamed - Upper Woodhouse to reflect the historic character and identity of the area.</p>	<p>Noted and amendment to wording agreed.</p>
	<p>7.2.5 The image shown has no relevance to the Calderdale local character discussed earlier in the document and appears to be brick built rather than stone. If you are going to provide examples to show the intent, ensure they are specific to the area and previous text.</p> <p>The street pattern describes becoming more formal towards the local centre but there is no current centre. This is merely a hypothetical notion within the document. The use of an orthogonal layout is superimposing a structure which does not exist within the area.</p>	<p>Policy BT1 – High Quality Inclusive Design of the Calderdale Local Plan provides the policy framework for achieving quality design. This policy was subject of scrutiny throughout the Local Plan examination process and subject to various rounds of public engagement.</p> <p>The policy contains specific reference to accounting for local context and distinctiveness.</p> <p>Further, all planning applications will be assessed against Local Plan Policy BT2 - Privacy, Daylighting and Amenity Space and Annex 2 - Space About Dwellings with regards to residential amenity for new and existing residents.</p>

		<p>With regards to historic character, all forthcoming applications will be assessed against Policy HE1 – Historic Environment of the Calderdale Local Plan, which has specific reference to elements which make a particularly important contribution to the identity, sense of place and local distinctiveness.</p> <p>The Council's Conservation Team and Historic England have been consulted throughout the Local Plan process, in the formation of this SPD and will also be on submission of phased planning applications. Historic England have welcomed the inclusion of the validation requirement to prepare a site-specific Heritage Statement or Heritage Impact Assessment (as appropriate) and Archaeological Appraisal.</p>
	<p>Page 90</p> <p>2. Siting the SuDS in the 2 areas shown would only provide SuDS for part of the site. Unless the intention is to drain the surface water uphill. Siting the SuDS within the proposed play areas and village greens may create a Health and safety issue when storing and attenuating the surface water. How is the development intending to mitigate the surface water run off from the remaining hillside and fields during the initial phases?</p> <p>3. Does this not contradict previous comments on closing Firth House Lane and Shepherds Thorn Lane to traffic?</p>	<p>The majority of the site drains towards the east/southeast, towards Bradley Park Dike which runs along the southern boundary. The northern and western parts of the site do fall towards the existing houses. The drainage will be designed to manage runoff from this area and direct it to the proposed site SW drainage system. In consultation with the drainage strategy consultants, flows will not be directed to existing properties.</p> <p>The Drainage Strategy will be developed with the parcels of land in mind, so that surface water from each parcel will be collected, and sufficient storage for the design flood event (plus an allowance for climate change and urban creep) provided, in agreement with the DS consultant.</p> <p>Discussions with the DS consultant highlighted the phased approach and drainage connections and outfalls will be provided to link initial phases to the ultimate outfall, this was highlighted to be Bradley Park Dike to the east of the site, which drains into the River Calder.</p> <p>The LLFA are awaiting the finalised DS for the whole site however initial talks with the consultant have been productive and are expected to be in line with the comments raised. The</p>

		whole site drainage will be addressed before any individual detailed site drainage plan.
	<p>6. There would appear to be a strong frontage to all parts of the development from the list of places where this is necessary.</p> <p>7.2.6 Again the image shown has no relevance to the local character of the area.</p>	Noted.
	<p>Page 92</p> <p>Where in the document does it discuss a gateway entrance from the River Calder? There is no existing access due to the existing railway line cutting across the northern boundary.</p>	The plans indicate that in the future, there may be opportunity to explore provision of an active travel route through the railway underpass.
	<p>1 & 4. These appear to contradict each other on the same plan. This does not seem well thought through.</p>	See previous comments regarding drainage.
	<p>Noting the various blue blobs, which is presumed to be ponds or water features; how are these to be created given the topography of the site?</p> <p>Page 98</p> <p>The SuDS are proposed on the steeply sided parts of the site. How will these be implemented given the topography? Or is the space only being used for SuDS as buildings cannot be built there? This is not integrating SuDS into the holistic design and but merely adding it as an afterthought.</p>	<p>The SuDS are shown in the lowest part of the Character Area, where water will naturally flow. In part, this is steeply sloping land, in other parts, not so much. The diagram makes it clear that these locations are indicative, and proposals will need to be worked through in detail as part of any application. However, the Council agree to an amendment to include indicative SuDS features in other parts of the green network to highlight the need for a holistic design.</p>
	<p>Page 99</p> <p>The formal Primary Street frontage appears to extend to the secondary access coming off Ryecroft Lane. Why?</p>	<p>The road linking the site access at Ryecroft Lane to the Primary Street does not perform the role of a Primary Street within the overall masterplan hierarchy, so it is identified as a Secondary Street. However, it has an important role to play in urban design terms, acting as the gateway to the first phase of development and creating a key route between the existing community and the new school and Local Centre. It is appropriate therefore for the character of the street frontage to</p>

	<p>7.3</p> <p>1. Local centre Frontage – If this is not relevant why is it included? TO further contradict this statement, there are descriptions earlier in the text describing the local centre and having three storey building within the centre.</p> <p>Boundary types.</p> <p>Again there are mixed messages. The images are showing brick built structures but the text and sketches indicate stone? The dimensions and sense of enclosure also contradict each other.</p>	<p>reflect this through a more regular and consistent frontage character. The name “Primary Street Frontage” is appropriate, even though it is not a Primary Street. However, we believe that it would be appropriate to amend the category from “Formal Primary Street Frontage” to “Informal Primary Street Frontage” to reflect a transition towards the existing properties.</p> <p>Some areas of the site on flatter or less visible land may have the potential for buildings up to 3 storeys high, which should be focussed within areas of higher density, a more urban character, or where an increased sense of enclosure is beneficial - for instance along the Primary Street or alongside open spaces. A Landscape and Visual Impact Assessment (LVIA) may be required to demonstrate any design proposal’s wider visual impact.</p> <p>The supporting text in paragraph 7.7.8 explains clearly how secondary wall materials may be used and provides photographs to show examples of poor designs where the predominant material is brick.</p>
	<p>How do some of these options suggested align with the ‘secured by design’ ethos previously mentioned? Eg Estate railings provide an easy ladder to climb up and or over.</p>	<p>In order to enable regular discussion and update, the Council established a Garden Communities Project Working Group including officers from planning, transport, education, flood risk and ecology. This group met on a regular basis to review and comment on aspects of the Masterplan SPD and associated Design Code SPD as they emerged. Representatives of public sector agencies including the Environment Agency, Yorkshire Water, Sport England, West Yorkshire Ecology, NHS Estates / Clinical Commissioning Group and West Yorkshire Police were invited to particular workshops or met individually as appropriate.</p> <p>In addition, a series of in-depth topic workshops were held covering stewardship, ecology, drainage, highways design and design coding. These were attended by relevant council officers and various external stakeholders as listed above.</p>

	<p>7.6</p> <p>Within the example images shown, these are predominantly brick which is a secondary material on the palette provided in the document.</p>	<p>The supporting text in paragraph 7.7.8 explains clearly how secondary wall materials may be used and provides photographs to show examples of poor designs where the predominant material is brick.</p>
	<p>8.0</p> <p>8.14 – 7 How do these align with current highways legislation and health and safety (safe ways of working) for statutory undertakers?</p>	<p>The Council's Highways Team have been consulted throughout the Local Plan process, in the formation of this SPD and will also be on submission of phased planning applications. Focussed sessions have taken place regarding highways standards, requirements and adoption arrangements.</p>
	<p>8.1.14</p> <p>Within the public art section, there is no mention of working with the community to create art that is site and community specific for which the community have ownership and respect. There is one line which talks of the opportunity for the artist to liaise with the design team?! This appears to be paying lip service to the concept of public art and with no thought or consideration to what the community wants or needs</p>	<p>The details of the public art will be proposed at application stage following community engagement on phased applications and public consultation on the specific phase. The design code provides some key principles which must apply to all proposals involving public art.</p>
	<p>8.1.22 – 24</p> <p>This seems ill conceived. Following planting of temporary trees are they to then be felled or removed?</p> <p>A masterplan of the green infrastructure should be prepared and implemented from the initial phase to allow it to mature in line with completion of the site's full development.</p>	<p>The design code provides guidance relating to temporary landscape treatments, which will assist in minimising the impact of ongoing construction work and improve the appearance of undeveloped land. Where possible and suitable, the temporary landscape treatments may be incorporated within the phase specific landscaping plan, which is stipulated as a validation requirement in Appendix 2 - Validation Requirements of the Draft Woodhouse Garden Community Masterplan SPD.</p> <p>The Tree Surveys, Ecological Reports and BNG assessments will ensure a policy compliant scheme for providing Green Infrastructure and Natural Environment (in line with Chapter 23 of the Local Plan) is devised.</p>

	<p>8.2</p> <p>This section should be integrated into all sections of the document. There was a previous section on street design which did not mention inclusive or accessible design, likewise in the section for play areas and spaces. This very important element is then covered in a few sentences at the end of the document. There is a misuse of language which again questions the thought given to this. Why do all 'sensory impaired' people require tactile paving?</p>	<p>Inclusive Neighbourhoods is a key ethos of the Garden Communities as identified in the Vision and Core Objectives Chapter.</p> <p>Policy BT1 – High Quality Inclusive Design of the Calderdale Local Plan provides the policy framework for achieving quality, inclusive design. This policy was subject of scrutiny throughout the Local Plan examination process and subject to various rounds of public engagement.</p> <p>All proposals will be assessed against this policy and the Placemaking Design Guide SPD once adopted.</p>
	<p>10.1</p> <p>How is this local levy to be collected or enforced? Is this over and above the council tax paid to the council to manage those assets mentioned? IS this taxing someone twice for the same thing? Who will set the charge the Trust or Council? We do not support a contribution for this from existing residents.</p> <p>10.1.2</p> <p>'to be owned, maintained and managed in perpetuity by a capable, democratic and robust locally managed organisation' sounds like a council.</p>	<p>A service charge will be levied on all new homeowners to support the maintenance of the community land and facilities, and the planned community development work. The assets (and liabilities) will be owned and managed by a new local Community Trust and so they will not be owned or managed by Calderdale Council. Residents will also pay the Council Tax.</p>
	<p>General Comments</p> <p>Appearance:</p> <p>The document appears unchecked. There are spelling mistakes in the text, errors on the plans and contradictions in text and plans.</p> <p>The keys to plans do not match the hatches, colours and line types shown on the plans.</p>	<p>Noted - various suggested amendments and corrections have been passed to the masterplanning team along with the numerous suggested amendments to plans as referenced above.</p>
	<p>This is obviously confusing and makes the reader question the accuracy and professionalism of the document and what</p>	<p>Throughout development of the masterplan and design code documents, careful consideration has been given to the choice of wording and the implications this may have. The Calderdale</p>

	<p>authority it will have in guiding or regulating planning submissions and developers.</p> <p>The language used in the document is woolly and heavily caveated. Caveats within a lot of these statements continue to dilute the authority of the document and make it meaningless in terms of a design code to be abided by.</p> <p>Some of the images used bear no resemblance to the local character of Calderdale, Brighouse and or Woodhouse, especially in the 'Identity' chapter where it is so important to give a clear message and example of what is required.</p>	<p>Local Plan is ultimately the policy framework upon which these documents are based, any planning application will therefore need to be in conformity with these policies - it cannot go further or introduce policy or reduce the flexibility that a policy often provides. A delicate balance must be achieved in providing supplementary guidance and avoiding producing a rigid set of parameters that results in an unusable document that could in turn stymie delivery of the Garden Community.</p>
	<p>Plans contradict each other. The school building appears to be sited differently in various plans, either linking with the local community hub or not depending on which chapter you look in.</p>	<p>Noted – see above response.</p>
	<p>The indicative nature of the plans do not give an impression of the scale of streets and buildings such as housing and the school. This appears to being underplayed to give a false impression of the impact of such features.</p>	<p>Noted</p>
	<p>Infrastructure Planting and Bio Diversity:</p> <p>Noting the current phasing of the development, there appears to be no thought given to implementing the necessary green infrastructure on which the 'garden community' is being promoted. The development will take an estimated 10 years plus to develop and complete. Without preparing and implementing the habitat network and green corridors within the initial phase this will not be allowed to mature and provide the connectivity required for the completion of the development. A masterplan of the green infrastructure should be prepared and implemented from the initial phase to allow it to mature in line with completion of the site's full development.</p>	<p>All phased applications will be assessed against the policy framework established in chapter 23 of the Local Plan, in particular Policy GN1 – Securing Green Infrastructure Provision.</p> <p>The SPD then provides detailed guidance at an appropriate level to allow phased applications to adhere to the site-wide infrastructure strategy.</p> <p>Please see above responses regarding securing BNG uplift and consideration of the Wildlife Habitat Network.</p> <p>It is also crucial to note that the BNG Net Gain SPD will be a material planning consideration once adopted and is likely to contain advice on phased development.</p>
	<p>Density and Infrastructure</p>	<p>The proposed densities have been stated taking into account the LTN1/20 highway requirements. The developers were also</p>

	<p>Noting the proposed street design layouts, both primary, secondary and tertiary, is there sufficient space to provide this ideal within the site and ensure the density of development proposed? If not, which elements have priority in the master planning of the site?</p> <p>Noting the density figures mentioned, would it not be useful to show the spread of properties across the site on a plan to give an indication of size and spacing?</p>	<p>aware of this requirement from a very early stage in the masterplanning process.</p>
	<p>Infrastructure:</p> <p>The lack of focus on the infrastructure and access to site and how this will facilitate the construction phasing shows no understanding or consideration of the impact on the existing community.</p> <p>The phasing of the construction of individual parcels contradicts the highway infrastructure and access hierarchy. It puts the emphasis on the existing limited infrastructure supporting phases 1 and 2 before a connected central spine road (primary street) is provided. It is noted that the vehicular access from Ryecroft Lane and Woodland Gardens will be restricted but this will not be possible if there is no primary route out onto Huddersfield Road. This could impact the exiting community for a number of years given an estimate of 11 years for the construction period is given in the document.</p> <p>How will the construction traffic navigate the existing streets given the size of plant and material requirements to construct the number of properties in the initial phases?</p>	<p>The masterplan document contains a chapter detailing the delivery strategies for key items of infrastructure required to facilitate development on the allocation. Crucially, the documents contain specific information regarding the funding strategies for that infrastructure and the expected developer contributions.</p> <p>The need for more certainty relating to the delivery of key items of infrastructure is acknowledged. As such, the phasing strategy of the SPD will be amended to ensure further clarity.</p> <p>The point at which the primary street will be required will depend on the outcome of the phase specific transport work.</p>
	<p>Services:</p> <p>There is no mention of the existing services infrastructure within the document. How will the development be serviced in terms of gas, electricity, foul and surface water drainage?</p>	<p>See above responses regarding utility provision and the drainage strategy.</p>

	<p>Given the size of the development, will this require a major installation and upgrade in terms of gas supply, electric supply and sewerage.? Will this require a branch off Huddersfield Road which would change the emphasis on which phases should be delivered first?</p> <p>In the current proposal, how will the initial phases be serviced?</p>	
	<p>Noting the topography of the land, how will the sewerage requirements be met? The existing infrastructure adjacent to the proposed development will only be sized to accept the current properties. Noting the previous greenbelt and lack of development, additional capacity will have not been considered. An additional 680 properties will require a significant upsize in capacity.</p> <p>Where will these new runs or connections be made given the fall of the land and location of the railway track?</p> <p>Would the sewage have to be pumped up to the interface with Huddersfield Road?</p> <p>Drainage:</p> <p>The current topography of the site would indicate that the surface water flows will fall from southwest to northeast but with a crossfall to the north which will impact on the existing properties to the north if not addressed.</p> <p>Due to the density of housing proposed in these areas there does not appear to be sufficient space to mitigate the surface water flows through attenuation or SUDS.</p> <p>In having the initial parcels and phases in this area, they will have to deal with the flows from across the site which collect in this area until the later phases are developed.</p>	<p>Surface water will require appropriate attenuation within each phase to offset the runoff from the development, restricting the runoff rate to the pre-development greenfield runoff rate. Similarly, the fouled drainage will have sufficient storage for foulds and a restricted runoff rate to the public sewer system, which given the topography of the site is initially proposed to be pumped to Woodhouse Lane</p> <p>The majority of the site drains towards the east/southeast, towards Bradley Park Dike which runs along the southern boundary. The northern and western parts of the site do fall towards the existing houses. The drainage will be designed to manage runoff from this area and direct it to the proposed site SW drainage system. In consultation with the drainage strategy consultants, flows will not be directed to existing properties.</p> <p>The Drainage Strategy will be developed with the parcels of land in mind, so that surface water from each parcel will be collected, and sufficient storage for the design flood event (plus an allowance for climate change and urban creep) provided, in agreement with the DS consultant.</p> <p>Discussions with the DS consultant highlighted the phased approach and drainage connections and outfalls will be provided to link initial phases to the ultimate outfall, this was highlighted to be Bradley Park Dike to the east of the site, which drains into the River Calder.</p> <p>The LLFA are awaiting the finalised DS for the whole site however initial talks with the consultant have been productive</p>

	Where will the outfalls from the site connect with the existing infrastructure given the topography of the site and the railway being between the site and the River Calder?	and are expected to be in line with the comments raised. The whole site drainage will be addressed before any individual detailed site drainage plan.
	<p>Construction:</p> <p>How will the impacts on the existing community and surrounding habitat be mitigated given the location of the initial phases?</p> <p>Traffic movements and out of the site would seem prohibitive given the limited accessibility.</p> <p>How will the necessary construction equipment and materials for the initial houses be brought in without an adverse impact on the exiting community?</p> <p>The obvious answer would be to provide an access from Huddersfield Road but this does not appear to have been considered.</p> <p>Noise and pollution in and around the site would also have to be mitigated.</p> <p>How will the impact on the existing habitats to be preserved be mitigated?</p>	<p>Applicants will be required to submit a Construction Management Plan (CMP) as part of any planning application submission. A CMP should address how adverse impacts associated with development and cumulative impacts of any other nearby construction sites will be managed.</p> <p>The design code also provides guidance relating to temporary landscape treatments, which will assist in minimising the impact of ongoing construction work and improve the appearance of undeveloped land. See Temporary Landscape Treatments section 8.1.22.</p> <p>The Council's Environmental Health Team will be consulted on all phased applications and will provide guidance and assessment on residential amenity.</p> <p>Any planning application will need to be prepared taking into account the conclusions of an Air Quality Impact Assessment, and additionally be compliant with Policy EN2 – Air Quality of the Local Plan, which was subject to modifications requested by the Inspector.</p> <p>Appendix 1 of the Draft Woodhouse Garden Community Masterplan sets out the anticipated Section 106 Requirements for each phase and includes a contribution up to the estimated damage cost to be spent on air quality improvements within the locality, determined by the Air Quality Impact Assessment for each phase.</p> <p>Other policies included in the Local Plan and developed in the SPDs will also contribute to mitigating increases in air pollution, such as provision of Green Infrastructure, Sustainable Transport and the Natural Environment.</p>

	<p>WOODHOUSE MASTERPLAN</p> <p>Accessing the documents</p> <p>Note relating to display settings is incorrect as including the cover page in two page view offsets facing pages noted in text in main document.</p>	Issue dependent on viewing /printing options on individual computer programmes.
	<p>Comments</p> <p>Intro page v: Document appears incomplete as text box notes 'Richard to provide foreword...' It would raise the question what else needs to be included which has not yet been completed?</p>	Noted – final version will not include this reference.
	<p>1.1</p> <p>Why is it described as a strategic urban extension of Brighouse when there is no infrastructure strategy to facilitate the proposed housing? It looks like you are pursuing an ad hoc, piecemeal development approach.</p> <p>If the SPD are to be considered a material consideration in the planning process why have Redrow Homes ignored the draft proposals?</p> <p>As above.</p>	<p>The masterplan document contains a chapter detailing the delivery strategies for key items of infrastructure required to facilitate development on the allocation. Crucially, the documents contain specific information regarding the funding strategies for that infrastructure and the expected developer contributions.</p> <p>Throughout the masterplanning process, the Council has commissioned an Infrastructure Delivery Cost Plan and numerous viability assessments. This work attributes costs to the infrastructure necessary for development schemes within the Garden Communities to be funded by future house builder schemes in so far as it is viable to do so. The work also identifies project costs that are of wider benefit which cannot be attributed to a phase schemes.</p>
	<p>Appendix A Site Allocations (it is not clear where to find this information) – why does the document fail to cover all the requirements listed in Appendix A? Example : Why has no Landscape and Visual Impact Assessment (LVIA) been carried out for the site to inform and shape the masterplan process</p>	The SPDs will be material planning considerations in the assessments of all forthcoming planning applications.

	<p>As noted in 1.1.2, this appears to have been ignored and piecemeal development will continue as developers seek only to further their specific areas and allocations.</p> <p>Page 6 The administrative boundary line does not connect in the middle. Are all these elements existing or proposed?</p>	<p>Appendix 2 - Validation Requirements of the Draft Woodhouse Garden Community Masterplan SPD indicates a requirement for a Landscape and Visual Impact Assessment to be submitted as part of a phased planning application. The wording of section 4.3.3 will be strengthened to ensure clarity.</p>
	<p>1.2</p> <p>1.2.4 Where is the statement of consultation to show who, what, where and how you have engaged so far and a summary of the outcomes?</p>	<p>See section 6.1.7 detailing the approach to piecemeal development.</p> <p>In order to enable regular discussion and update, the Council established a Garden Communities Project Working Group including officers from planning, transport, education, flood risk and ecology. This group met on a regular basis to review and comment on aspects of the Masterplan SPD and associated Design Code SPD as they emerged. Representatives of public sector agencies including the Environment Agency, Yorkshire Water, Sport England, West Yorkshire Ecology, NHS Estates / Clinical Commissioning Group and West Yorkshire Police were invited to particular workshops or met individually as appropriate.</p>
	<p>1.2.6 The A641 Corridor Investment Programme has been noted as a strategic project. What mitigation is in place should this project not be implemented? We already know that it does not include the required critical mitigations listed in the Infrastructure Delivery Plan so how can the Garden Suburbs be deliverable. You need to show this.</p>	<p>In addition, a series of in-depth topic workshops were held covering stewardship, ecology, drainage, highways design and design coding. These were attended by relevant council officers and various external stakeholders as listed above.</p>
	<p>1.2.6 What are the viability appraisals mentioned? Where are these?</p>	<p>Comments relate to matters outside the scope of the SPD consultation.</p> <p>There is no suggestion that the A641 programme will be paused or cancelled.</p>

		<p>Throughout the masterplanning process, the Council has commissioned an Infrastructure Delivery Cost Plan and numerous viability assessments. This work attributes costs to the infrastructure necessary for development schemes within the Garden Communities to be funded by future house builder schemes in so far as it is viable to do so. The work also identifies project costs that are of wider benefit which cannot be attributed to a phase schemes.</p> <p>Costs that cannot be allocated to phase plots need to be funded and delivered by the Council. These Council-delivered works are proposed to be funded through prudential borrowing which is capable of recovery via a roof tariff mechanism levied on each new home.</p>
	<p>1.2.7 Stage 2 was earlier this year. Where is the documentation to support the</p> <p>How is the drainage and infrastructure delivery to be implemented if the various areas of developments are to be built on a phase by phase basis without an overarching strategy? How is the critical infrastructure to be implemented? Are the initial developments to provide the necessary infrastructure for the later developments crossing their sites? With the options for stewardship and management, does this mean the council is not going to adopt the open Spaces play areas and streets?</p>	<p>The Council's valuation specialist advisors have presented their viability assessment report findings based on proposed tariff rates derived from the capital cost estimates attributed to the critical schemes. These findings confirm that the Garden Communities are viable based on these input assumptions.</p> <p>See above response regarding drainage.</p> <p>See chapter 7 – Implementing the Stewardship Strategy for details of adoption arrangements.</p>
	<p>1.3</p> <p>1.3.2 How are the council seeking developers to construct the housing with the minimal carbon footprint to support the climate emergency? This is not clear.</p>	<p>The Draft Woodhouse Garden Community Masterplan SPD provides appropriate additional guidance on how the Garden Community will be delivered. Including infrastructure delivery (see paragraph 6.2). The approach to the use of developer contributions, including the roof tax. Also, other Section 106</p>

	<p>1.3.4 We are concerned about your ability to secure the 10% Biodiversity Net Gain (BNG). What work has been done on this to confirm it is achievable and the costs (which will be significant) given the land is green belt land. Where are the strategies to provide the equivalent categorised habitat and necessary green space within the area or neighbouring the proposed development?</p>	<p>obligations (see paragraphs 6.3 and 6.4. Individual Section 106 agreements will need to reflect this guidance.</p> <p>The Renewable and Low carbon chapter of the Local Plan provides the policy framework relating to developments supporting renewable and low carbon energy. These themes are developed in more technical detail in this and other emerging SPDs, specifically the Renewable and Low Carbon SPD.</p> <p>These documents are set against a national picture where planning policy and guidance is expected to be strengthened through changes to the planning system. Initiatives such as the Future Homes Standard and the ongoing strengthening of the Building Regulations will, for example, require greater levels of energy efficiency and renewable and low carbon energy to be utilised in new developments over the construction period of the Garden Communities.</p> <p>See previous responses on BNG uplift.</p>
	<p>1.3.11 What infrastructure is being put in place to facilitate the development? This is not clear</p>	<p>The SPD provides appropriate additional guidance on how the Garden Community will be delivered, including infrastructure delivery (see paragraph 6.2) and the approach to the use of developer contributions including the roof tax and other section 106 obligations - see paragraphs 6.3 and 6.4 of the Masterplan. Individual section 106 agreements will need to reflect this guidance.</p>
	<p>1.3.20 How is this to be implemented? Will the council not adopt the open spaces and streets? If not, at what point are the infrastructure and community assets handed over or built following completion of one or all the various areas of development?</p>	<p>See chapter 7 for detail in response.</p>

	1.3.27 Surely the location and topography of the development in relation to the town centre will deter people from walking or cycling and actually discriminate against those members of the community less able?	
	<p>1.4</p> <p>1.4.8 The southeast area seems reasonably affluent compared to other areas so why is there a need to pour an 'unprecedented capital investment' into the southeast when other areas would benefit more? Is the figure shown for the A641 Corridor scheme still correct? This has all gone very quiet and there is no confirmation that the scheme is still going ahead.</p> <p>1.4.9 Where it states that individual parcels are expected to conform to the design code, it should state that they shall conform?</p>	<p>The Council's spatial development strategy was discussed at the Local Plan hearings along with its approach to supply.</p> <p>Throughout development of the masterplan and design code documents, careful consideration has been given to the choice of wording and the implications this may have. The Calderdale Local Plan is ultimately the policy framework upon which these documents are based, any planning application will therefore need to be in conformity with these policies - it cannot go further or introduce policy or reduce the flexibility that a policy often provides. A delicate balance must be achieved in providing supplementary guidance and avoiding producing a rigid set of parameters that results in an unusable document that could in turn stymie delivery of the Garden Community</p>
	1.4.12 When will these additional SPDs be completed? Noting the importance placed within the document on BNG and climate resilience, surely these must be in place before any submission is made for the development of parcels of land? All SPDs must be in place to control the strategic sites before planning applications are considered.	See above response regarding suite of SPDs in conformity to advice in the Garden Community SPDs.
	<p>2</p> <p>Underpinning the ethos:</p> <p>This must be in accordance with the general design guidance SPD that is being developed.</p> <p>'Retain and enhance ecology' appears a bit conflicting when it is greenbelt that is removed to facilitate the development.</p>	See above response regarding suite of SPDs in conformity to advice in the Garden Community SPDs.

	Working with the topography does not seem to have been thought through in terms of accessibility when aligned with active travel.	
	<p>3.1</p> <p>3.1.3 Does the site not fall steeply to the north where the fields and scout facility drop away to the River Calder?</p> <p>The description of the topography is limited to the site and does not include the surrounding areas which will impact on the accessibility of the area to the wider town.</p> <p>The existing access routes, Firth House Lane and Shepherds Thorn Lane, are both single lane and will need to be retained in full to allow access.</p>	Noted
	<p>Page 18</p> <p>The plan indicates the boundary to existing dwellings as a hatched area which would indicate some sort of screening which is not reflected in the text on the adjacent page. This is misleading.</p>	<p>The plan indicates the location of the boundary with the existing dwellings to highlight areas where careful consideration is required.</p> <p>All planning applications will be assessed against Local Plan Policy BT2 - Privacy, Daylighting and Amenity Space and Annex 2 - Space About Dwellings with regards to residential amenity for new and existing residents.</p> <p>Policy BT2 - Privacy, Daylighting and Amenity Space of the Local Plan provides the policy framework for securing adequate space around buildings.</p> <p>All new development within the Garden Community will need to demonstrate that it would not result in any significant adverse impact on the living conditions of existing adjacent residents or other occupiers with regard to privacy, daylight and over-shadowing in particular. It must also provide acceptable living conditions for future occupiers in respect of privacy, daylighting and private amenity space.</p>

		<p>Further guidance standards on privacy, daylighting and amenity space can be found at Annex 2 - Space About Dwellings of the Calderdale Local Plan.</p> <p>The guidance includes recommended space standards that will be applied in assessing residential development proposals.</p>
	The hedgerow lined access routes and PROWs are not hatched as the Wildlife Habitat Network. These are important linkages which should be highlighted. The Wildlife Habitat Network in Kirklees has not been mentioned and needs to be.	Maintaining the ecological functioning of the Wildlife Habitat Network will be considered at the planning application stage. Existing boundary habitats will be retained and enhanced where possible
	The Bradley Park Dyke waterway is hidden by the site boundary.	The waterway is clearly labelled.
	<p>3.2</p> <p>3.2.2</p> <p>The new primary school does not show how it will be serviced. How will vehicle numbers be restricted on Ryecroft Lane? There is no mention of the surrounding roads and the current congestion caused by parked cars and limited visibility. Both Woodhouse Lane and Daisy Road are single vehicular access when cars are parked on the road. Ryecroft Lane and Woodhouse Gardens are accessed from these roads.</p>	<p>During the Local Plan Examination process, the Local Highway Authority indicated that, in principle, the site is capable of being safely accessed and that related off-site highway mitigation measures could be achieved. Initial masterplans showed the main access would be provided via the A641 with secondary accesses off Ryecroft Lane and Woodhouse Gardens.</p> <p>The Planning Inspector noted that future Transport Assessment work associated with phased planning applications will provide an opportunity to explore access and mitigation measures in more detail. The Inspector was however satisfied that safe access to the site is capable of being achieved and that in order to be effective Appendix A should be amended to refer to the provision of main and secondary vehicular access points.</p> <p>The point at which the primary access will be required will be dependent on the site-specific transport survey work.</p>
	There is no mention of the weight restriction on the railway bridge which will impact accessibility during both construction phase and the serving of the development once completed. All	Discussions have been held with the developers regarding construction vehicle access. They are aware of local restrictions including the weight restriction on the Birds Royd Lane bridge.

	<p>heavy vehicles will have to access from Woodhouse Lane, Daisy Road, Ryecroft Lane and Woodhouse Gardens</p> <p>The turning head is only there due to the road being a cul de sac.</p>	
	<p>The proposed sports field and park area, which is an existing cricket ground, has one of the main vehicular access routes running through it. How does this provide a safe play and sports area?</p>	<p>The design of the access and surrounding land will be firmed up at phased planning application stage, based on advice contained within the Local Plan and SPDs.</p>
	<p>Bullet point 9 'Potential for Shepherd's Thorn Lane' does not make sense, either missing text or punctuation. How would this be achieved and still allow the scout facility to operate.</p>	<p>The Council agrees to amend the current wording of bullet point 9 to say: "Potential for Shepherd's Thorn Lane to be closed to vehicular traffic from Woodhouse Lane once alternative vehicular access is provided via new junction on A641 Huddersfield Road."</p>
	<p>The proposed cycle routes traverse the most challenging topographical areas and would not be easy routes to cycle.</p> <p>The cycle route northwest to south east does not exist as an accessible route.</p> <p>Huddersfield Road is not a safe cycle route.</p>	<p>While the comments are outside the scope of this SPD consultation, the A641 Corridor Improvement Programme does include improvements to Huddersfield Road.</p>
	<p>What access is being provided for the primary school and local centre? There is no indication of how these would be serviced.</p>	<p>Details will be confirmed at planning application stage.</p>
	<p>The potential for improved linkage (brown arrows) crosses the railway line. There is no current access route through.</p>	<p>The plan indicates that in the future, there may be opportunity to explore provision of an active travel route through the railway underpass.</p> <p>Plans will be amended to make it clear that this is a potential proposal as the allocation progresses.</p>
	<p>There is no buffer planting indicated on the plan to the north of the site to provide screening for the existing properties.</p> <p>The proposed employment areas to the south in Kirklees (in yellow) appear to be on the existing golf course.</p>	<p>All new development within the Garden Community will need to demonstrate that it would not result in any significant adverse impact on the living conditions of existing adjacent residents or other occupiers with regard to privacy, daylight and over-shadowing in particular. It must also provide acceptable living</p>

		<p>conditions for future occupiers in respect of privacy, daylighting and private amenity space.</p> <p>Further guidance standards on privacy, daylighting and amenity space can be found at Annex 2 - Space About Dwellings of the Calderdale Local Plan. The guidance includes recommended space standards that will be applied in assessing residential development proposals.</p>
	<p>4</p> <p>Various spelling mistakes exist within the text.</p> <p>4.1</p> <p>4.1.2 The mosaic of habitat and spaces does not seem apparent from the plan shown. Most of the open space/habitat is to the south of Bradley Park Dyke</p>	<p>Comment noted and text reviewed by masterplanning team.</p>
	<p>4.1.3 The school footprint and playing fields appear to encompass a much greater area than shown in the previous plan 'Site constraints and opportunities'.</p>	<p>Detail not required for plan of this nature – see following plans along with detail in the nature chapter.</p>
	<p>4.1.4 There is no existing park. This area is open grassland with some spoil from previous development.</p>	<p>The site opportunities plan provides a potential location. The masterplan framework provides the additional detail which will be then developed further as the proposals develop and the application is submitted.</p>
	<p>There is no buffer shown between the existing community and proposed development as shown in the site constraints plan.</p>	<p>See previous response regarding potential upgrades to the Council-owned land as part of the access proposals.</p>
	<p>The school and playing fields are sited on one of the steepest and highest parts of the site. How is a level playing field and accessible school to be developed in this location? The NEAP is also shown within this location.</p> <p>What are the green spaces between the parcels of development? Will these become streets or remain as grassed areas or scrub woodland?</p>	<p>It is necessary to flag these critical relationships as a site constraint, the detail will be provided at application stage, in accordance with the relevant policies of the Local Plan as highlighted above.</p>

	<p>Page 21-22</p> <p>Key</p> <p>This does not align with the adjacent plan as noted below.</p> <p>Where is the secondary local centre. This is not easily visible.</p> <p>What is the multifunctional greenspace? Is this grassed areas or woodland?</p> <p>Parks and Garden have the same colour as the existing rees/woodland/hedges?</p> <p>Waterways are shown as trees in the key.</p> <p>There is no primary road shown.</p> <p>The primary access is from a point previously shown only as a potential access point.</p> <p>The secondary road arrow is solid and not dashed as the plan.</p> <p>There appear to be no primary active travel routes. What are these defined as?</p> <p>What are secondary active travel routes defined as?</p> <p>Are all existing PROWs, shown in orange dashed lines, to be removed as only purple dashed routes are to be retained or re-routed?</p> <p>Are the orange PROWs proposed or will they be streets?</p> <p>The school access and turning head is not shown.</p> <p>How is Shepherds Thorn Lane to be closed to vehicles and still retain access for the existing residents?</p> <p>What is the purple solid line and arrow north of the school area?</p> <p>4.2</p>	<p>The majority of these comments stem from the fact that the key is misaligned by one, resulting in a lack of clarity. Some of the lines are also not quite as clear as they might be. Worth noting that the key to the same masterplan on page 7/8 in the Design Code is correct.</p> <p>The way that the PRoW is identified is not as clear as it should be and needs to be amended.</p> <p>As noted above, the closure of the top section of Shepherd's Thorn Lane can only happen when new vehicular access via the A641 Huddersfield Road has been provided.</p> <p>Various actions agreed:</p> <ul style="list-style-type: none"> • Update the key to ensure that it is correct and amend the line styles and colours on the masterplan as required to ensure clarity. • Amend the key to say: "PRoW to be retained." • Delete the line style and key saying: "PRoW to be retained/re-routed" as none are shown on this plan. • Amend the key to say "Shepherd's Thorn Lane closed to vehicles and converted to primary active travel route (after completion of Primary Street)" • Change "Primary Road" and "Secondary Road" in key to "Primary Street" and "Secondary Street" for consistency with rest of document and Design Code. <p>Note: same applies to the masterplan in all four documents.</p>
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	4.2.3 The use of language such as school drop off and associated parking contradicts with the emphasis on active travel routes and cycling and walking	<p>Agree that use of the phrase “school drop-off” does not reflect the aspirations for active travel on the site. The “associated parking” provided for the local centre is provided in line with Local Plan policy requirements.</p> <p>Agree to amend the 3rd sentence of paragraph 4.2.3 to say: “Its proximity to the school will maximise the potential for dual use at the beginning and end of the school day.”</p>
	4.2.4 This is the first time SUDS is mentioned within the document. Is on street parking not conflicting with the emphasis on active travel? There appears to be conflicting messages.	<p>Annex 1 - Car & Bicycle Parking Standards of the Calderdale Local Plan establishes the Council's car and bicycle parking standards. The supporting text also explains the reason for the Council's approach and the move away from maximum parking standards at residential properties.</p> <p>The plan is provided to demonstrate the approach to building heights and density, other information has been limited to enable clear and understandably interpretation.</p> <p>See previous response regarding the requirement for a Landscape and Visual Impact Assessment.</p>
	<p>4.3</p> <p>4.3.2 There is no Primary Street shown which limits the understanding of the text and plan</p>	Amendments to wording agreed to ensure clarity.
	<p>4.3.3 As the site is being divided into separate parcels for development is this a way of attempting to circumvent the need for a landscape visual assessment? Should this not be done as part of the master planning prior to any division of land into development parcels?</p> <p>4.3.4 and 4.3.5 The density description appears to show only that the development parcels with the greater density are those closest to the existing infrastructure. These would be</p>	<p>Section 4.3 of the document outlines the approach to building heights and density.</p> <p>The overall indicative developable area used to calculate the density in the Local Plan was based on constraints such as heritage and ecology. It did not take account of the land required for non-residential uses, such as education, the local centre and open space.</p>

	constructed first putting greater pressure on the existing infrastructure.	
	4.4.1 What does this mean? There is no content to define what these spaces are.	Paragraph 4.4.1 defines what a landscape strategy does.
	4.4.2 The playing fields appear to be directly linked to the school. We question why these are at the focal point for the whole development? What use would there be outside of school hours and holiday periods if the school is shut?	All facilities including the public open spaces, play areas, pitches, community centre and associated activities will be open to all residents, both new and existing.
	4.4.3 There is no existing park. This is an area of wasteland with contaminated spoil.	See above response regarding potential upgrades as part of access proposals.
	4.4.4 The community orchards do not appear to be in the best locations. Providing such a space adjacent to the listed building is not in keeping with the listed building and curtilage. Providing an orchard to the east on the steep slope shaded by the existing ancient woodland is also unacceptable due to the potential for fragmentation etc. Are these just shown in these locations because it is otherwise unused land?	<p>The Council's Conservation Team and Historic England have been consulted throughout the Local Plan process, in the formation of this SPD and will also be on submission of phased planning applications. Historic England have welcomed the inclusion of the validation requirement to prepare a site-specific Heritage Statement or Heritage Impact Assessment (as appropriate) and Archaeological Appraisal.</p> <p>The impact of this proposal on the Wildlife Habitat Network and ancient woodland needs to be considered</p>
	4.4.5 From the previous plan, it would appear the existing PROWs are being removed so the description is void. How are the existing hedgerows to be protected once the developers commence construction and seek access to the various parcels of land? All planting is naturalistic, the emphasis should be on native species and ensuring the most biodiversity for the area.	See range of previous comments including reference to Local Plan policy, the approach to existing trees and hedgerows and BNG requirements and strategy.
	<p>Key and Plan</p> <p>Where are the indicative incidental green spaces? The icon does not reflect the plan. Have these been applied in line with the Fields In Trust Guidance for Outdoor Sport and Play:</p>	The indicative location of incidental green spaces is marked on the plan on page 25. As highlighted in Appendix 1 – Site Number LP1451 – Land between Bradley Wood and Woodhouse Lane, Rastrick

	<p>Beyond the Six Acre Standard? What is the hierarchy of these spaces?</p>	<p>of the Local Plan, provision of Open Space on the allocation will be above policy requirements. The specific breakdown of phase-by-phase typology requirements, and total provision, is indicated in the Development Guidelines section of the SPD.</p> <p>Specific detail of provision (within each typology) will be in accordance with the guidance provided in the SPDs and determined at the time of each phased application in consultation with the Council's Open Space Team.</p> <p>The Council's Open Space Team will provide advice on phased applications based on up to date, relevant guidance available at the time of submission.</p>
	<p>Why is the village green not in the centre of the garden community as the focal point rather than playing fields or a shop?</p>	<p>The village green will be a key component in creating a sense of arrival to the Garden Community.</p>
	<p>Providing an arrival space adjacent to the secondary access point would indicate this would become a primary route.</p>	<p>See above response for explanation and detail.</p>
	<p>Why is there an open space deficiency on a site that is supposed to be a garden community? What confirmation has been provided to confirm all the land is available for open space?</p>	<p>While it is the intention for all open space to be provided on-site, the open space schedule indicates a policy shortfall in terms of playing pitch and sports provision. In line with Local Plan Policy GN6 (Protection and Provision of Open Space, Sport and Recreation Facilities) therefore, the Council will expect a financial contribution to be made to enable the creation or enhancement of facilities in the local area. The level and nature of the contribution will be managed through S106 agreement(s).</p> <p>The overall open space provision is considerable higher than Local Plan policy requirements.</p>

	<p>4.5</p> <p>This does not seem to address the wider issue of how these active routes link into the existing travel infrastructure and whether people would be willing to negotiate this once out of the garden community.</p> <p>4.5.2 Who will instigate the bus service? Which parcels of land for development would trigger the need for this?</p>	<p>Chapter 5 of the Design Code SPDs provide detailed information on the access and movement strategy that will underpin delivery of the allocation, including key design principles and high-level specifications. Appendix 1 of the Masterplans provide an indication of the probable s106 requirements for phased applications and include reference to off-site highway improvements and active travel connections beyond the red edge of the application.</p> <p>Appendix 2 - Validation Requirements of the Draft Woodhouse Garden Community Masterplan SPD include reference to a requirement for Travel Plans which will detail the long-term management strategies for integrating proposals for sustainable travel into the planning process. Plans will be based on evidence of the anticipated transport impacts of development and establish measures to promote and encourage sustainable travel within the site boundary and beyond.</p> <p>In addition, existing Rights of Way are identified as site opportunities in the documents and are highlighted as providing key connections between the existing residential areas and the countryside beyond. These must be considered and incorporated within phased development proposals.</p> <p>Discussions have been taking place regarding the requirements for bus provision</p>
	<p>4.5.3 What does this mean? This appears to be a woolly description with no substance.</p>	<p>Mobility hubs bring together shared transport with public transport and active travel in spaces designed to improve the public realm for all.</p> <p>The concept is increasingly spreading in the UK and will complement the ethos of the Garden Communities in providing active travel and enhanced connections.</p>

		While the contents of the mobility hubs are yet to be finalised, provision will be based on CoMoUK guidance
	<p>Key</p> <p>The line types and colours used do not reflect those on the plan and make the reading of this section difficult and confusing.</p> <p>Primary and secondary access icons are indistinguishable from each other.</p> <p>The primary street does not appear on the plan as the key.</p> <p>There is only one secondary street. How are the other parcels of land/development accessed?</p> <p>Which areas are to have restricted vehicular access? This is not apparent from the key and line types used.</p> <p>If some areas are to have restricted vehicular access, why are they designated as secondary access points? This does not appear to make sense.</p> <p>How can Shepherds Thorn Lane be closed to vehicles and still provide access to the scout community and residents?</p> <p>Who will fund the off-site cycleways? The developers?</p> <p>How will the off-site proposed quiet street be enforced if outside of the development area? What is a quiet street?</p> <p>The PROWs shown on this plan appear to contradict those shown on the key design principles plan.</p> <p>What does the bus stop icon mean? There is none shown on the plan.</p>	<p>Duplicate comments</p> <p>Agree that the key needs to be reviewed to check that the line styles align with those on the plan.</p> <p>The “Restricted vehicular access” refers only to the two bus turnaround areas. These should be renamed for clarity. The secondary access points are not also restricted access.</p> <p>Refer to previous responses in relation to Shepherd’s Thorn Lane.</p> <p>Various actions agreed:</p> <ul style="list-style-type: none"> • Revise the line styles in the key as required to correctly match those in the plan. • Rename “Restricted vehicular access” as “Bus turnaround facility (if required)” • Add clarification to “Proposed off-site quiet streets” (and “proposed off-site cycleways”) saying where information can be found? • Amend PROW as required to ensure clarity. • Bus stops to be added to plan in line with those shown on page 49 of the Design Code. Caption to be revised to say: “Indicative proposed bus stop”.
	<p>5.1</p> <p>5.1.4 This needs to be reflected in the buffer between existing residents and the proposed development. Providing screening</p>	<p>See above responses concerning both residential amenity and building heights.</p>

	should not impact on daylight and overshadowing of properties.	
5.2 5.2.1 Is the 2018 SHMA the most up to date guidance?		The Council is due to undertake a “refresh” of parts of the SHMA that will amongst other things look at size of homes needed across the Borough in 2023. Furthermore, it is expected further studies will take place in the lifetime of the development and can be used to inform individual planning applications.
5.2.3 How does this align with the emphasis on active travel and locating the garden community away from the town centre?		See above comments on active travel connections up to and beyond the red edge boundary of the site.
5.5 5.5.12 Noting the table provided, how does the inclusion of play areas provide BNG when these areas will have hard surfacing or soft play surfacing around play equipment? Sport pitches also lack the diversity of habitat.		The Environment Act 2021 amends the Town and Country Planning Act 1990. It sets out that the majority of developments will be legally required to demonstrate a minimum net gain of 10% and secure those gains for a minimum of 30 years. The requirement to demonstrate net gains applies to all habitats within the red line, regardless of whether they are impacted or not.
5.6 How is this to be implemented across the entire site when the land is divided into parcels for development? Given the topography of the site, will the separate parcels provide the infrastructure for the parcels above to transport the surface water runoff? Page 38 The principles of development are not referenced correctly. The PROWs bullet point appears to contradict previous mentions where PROWs are amended or removed.		The Drainage Strategy (DS) will be developed with the parcels of land in mind, so that surface water from each parcel will be collected, and sufficient storage for the design flood event (plus an allowance for climate change and urban creep) provided, in agreement with the DS consultant. Discussions with the DS consultant highlighted the phased approach and drainage connections and outfalls will be provided to link initial phases to the ultimate outfall, this was highlighted to be Bradley Park Dike to the east of the site, which drains into the River Calder.

		<p>The LLFA are awaiting the finalised DS for the whole site however initial talks with the consultant have been productive and are expected to be in line with the comments raised. The whole site drainage will be addressed before any individual detailed site drainage plan.</p>
6 6.1	<p>The phasing of the site appears to contradict the hierarchy of access proposed earlier in the document. How are the initial phases to be developed if the main primary street is not included in these works?</p>	<p>There is no requirement for the primary access to be provided prior to the first phase of development. The point at which the primary access is required will depend on the results of the Transport Assessment.</p>
	<p>The first two phases (over 70% of the housing) of the development appear to rely on the secondary points for access rather than the primary access and primary route through the development. How is this to be achieved with the constraints of the existing infrastructure in the surrounding area, including narrow streets, on street parking, weight limits to bridges, etc.?</p> <p>Where is the phasing strategy for the infrastructure? There appears to be no thought given for the implementation of the access to the site and how to mitigate the impact of the construction process on the existing community.</p>	<p>The traffic impact of the development has been considered as part of the Local Plan modelling process.</p> <p>The detailed traffic impacts at each junction will be assessed in the Transport Assessment submitted with the planning applications.</p> <p>A multi-modal model has been produced and has been made available to developers to assess the impact of their phases of development.</p> <p>Applicants will be required to submit a Construction Management Plan (CMP) as part of any planning application submission. A CMP should address how adverse impacts associated with development and cumulative impacts of any other nearby construction sites will be managed.</p> <p>The design code also provides guidance relating to temporary landscape treatments, which will assist in minimising the impact of ongoing construction work and improve the</p>

		<p>appearance of undeveloped land. See Temporary Landscape Treatments section 8.1.22.</p> <p>The Council's Environmental Health Team will also be consulted as part of the phased planning application process.</p> <p>The response to this comment falls outside the scope of this SPD consultation, however the mechanisms include adoption of SPDs, template S106 Agreements and binding Collaboration Agreements (the terms of these agreements have been influenced by the Council having taken the advice of leading Kings Counsel).</p> <p>The need for more certainty relating to the delivery of key items of infrastructure is acknowledged. As such, the phasing strategy of the SPD will be amended to ensure further clarity.</p>
	What is meant by the 'TBC' on the cricket pitch area and open space?	<p>Wording refers to the area of Council owned land to the north of the existing cricket club. Proposals for the secondary access may include enhancements to this land, including upgrades to the land and clubhouse.</p>
	6.1.4 Given the 11year period of construction, what mitigation will be in place to minimise the impact on the existing community?	<p>See previous responses concerning construction traffic, temporary landscape treatments and Environmental Health.</p>
	<p>6.1.5 There appears to be no maximum length of time to construct the development? Noting the disclaimer of the dependence on market conditions surely this goes against the council's argument for the need for this garden community?</p> <p>6.1.7 The two statements within this point contradict each other.</p>	<p>As with any housing development, the pace of delivery will depend on market conditions. It is not possible to impose time-limits on completion.</p>
	<p>6.2</p> <p>6.2.9 Is there not already a lack of surgeries and dentists in the existing community without adding the additional needs of the</p>	<p>Paragraph 6.2.8 outlines the position in terms of healthcare provision. While the possibility of provision on both sites was explored, consultation with the healthcare providers resulted in the decision being made to invest in existing facilities.</p>

	garden communities? How will this demand be addressed? There appears to be nothing in place to secure facilities.	
	6.2.11 When will this be implemented? Without a definitive deadline, this will be delayed or knocked back to subsequent phases.	The need for more certainty relating to the delivery of key items of infrastructure is acknowledged. As such, the phasing strategy of the SPD will be amended to ensure further clarity.
	6.2.12 If the A641 CIP is not implemented how will this impact on the development? The project is critical to the development, what alternatives are in place if these are not realised? How will the removal of key mitigations such as Huntingdon Bridge be addressed and funded via the equalisation agreement?	The A641 scheme has not been paused and designs are being developed.
	6.2.13 This notes that over half of the development (680 houses) can be built without the proposed infrastructure projects being completed. This figure is from the IDP Transport Assessment(TA) work. How has this been tested to verify it is correct and transparency. IM7 confirms the Council are supposed to be commissioning the masterplans which includes the evidence base. How is the existing local infrastructure supposed to support this additional pressure? No evidence of impact on the local Woodhouse Road network was provided within the IDP TA.	<p>If there is a severe impact at any junction, then the development will be required to fund mitigating improvements.</p> <p>The detailed traffic impacts at each junction will be assessed in the Transport Assessment submitted with the planning applications.</p> <p>A multi-modal model has been produced and has been made available to developers to assess the impact of their phases of development.</p> <p>See above comments regarding the A641, Transport Assessments and flexibility in wording of the site-specific consideration.</p>
	<p>6.2.14 Why is the funding strategy not included in this draft? It would seem fundamental to understand the implementation of the infrastructure.</p> <p>6.2.16 Caveats within a lot of these statements continue to dilute the authority of the document and make it meaningless in terms of a design code to abided by.</p>	Detail falls outside of the content of the SPD.
	The two initial phases will not be connected until phase 3 is implemented which will mean that there is no primary street or access to and from the site. The secondary routes and access	See above response regarding principle of using Ryecroft Lane and Woodhouse Gardens.

	<p>will have to support the majority of the development putting greater pressure on the existing infrastructure.</p> <p>What strategy is in place to ensure that the highway infrastructure for each phase is proportionate and able to accommodate further phases as they come online?</p>	<p>Further modelling work will be undertaken for the individual planning applications. Mitigation will be required at any junctions where there is a severe traffic impact.</p> <p>The Masterplan and Design Codes will ensure that the wider site is delivered in a comprehensive manner. Pre-application meetings have been held with the individual housebuilders and their proposals adheres to these documents.</p>
	<p>What strategy is in place to ensure that the drainage infrastructure for each phase is proportionate and able to accommodate further phases as they come online?</p>	<p>The requirement for the primary access will be dependent on the outcome of the phase specific transport survey work.</p>
	<p>Property Specific</p> <p>Our property is 7 Ryecroft Lane. We require further information on what the planting refers to behind our property, the depth of this, type of planting and height and how the key building will work adjacent to our property. This is unclear in the documents so we cannot comment without further clarity.</p>	<p>See above comments regarding the approach to drainage.</p>
	<p>We have a vegetable patch at the bottom of our garden against the stone wall. Any development/planting in this location needs to be set back sufficiently to avoid impacting on the amenity use/lifestyle of our outdoor space.</p>	<p>This level of detail will be provided at a planning application stage.</p> <p>All planning applications will be assessed against Local Plan Policy BT2 - Privacy, Daylighting and Amenity Space and Annex 2 - Space About Dwellings with regards to residential amenity for new and existing residents.</p> <p>Policy BT2 - Privacy, Daylighting and Amenity Space of the Local Plan provides the policy framework for securing adequate space around buildings.</p> <p>All new development within the Garden Community will need to demonstrate that it would not result in any significant adverse impact on the living conditions of existing adjacent residents or other occupiers with regard to privacy, daylight and over-shadowing in particular. It must also provide acceptable living</p>

		<p>conditions for future occupiers in respect of privacy, daylighting and private amenity space.</p> <p>Further guidance standards on privacy, daylighting and amenity space can be found at Annex 2 - Space About Dwellings of the Calderdale Local Plan. The guidance includes recommended space standards that will be applied in assessing residential development proposals.</p>
	<p>The three cottages (5-9) have cellars and regularly flood due to surface water/ground water and the position of underground wells as the water table rises in heavy or prolonged rainfall. This is especially the case when the vegetation has been cut back. We request our property is protected within any proposals and effective mitigations are put in place to prevent further issues that may arise from the imposition of development, hard surfaces and increased run-off.</p>	<p>See previous comments regarding site wide and phased specific drainage work.</p>
	<p>The cottages were built pre-1850 and are farmers cottages of the former Woodhouse Farm at Upper Woodhouse. The cottages and adjacent barns (6-10) are non heritage assets that should also be taken into account in the design of the site. We find no reference to the historic settlement.</p>	<p>The Council's Conservation Team and Historic England have been consulted throughout the Local Plan process, in the formation of this SPD and also on submission of phased planning applications. Historic England have welcomed the inclusion of the validation requirement to prepare a site-specific Heritage Statement or Heritage Impact Assessment (as appropriate) and Archaeological Appraisal.</p> <p>Policy BT1 – High Quality Inclusive Design of the Calderdale Local Plan provides the policy framework for achieving quality design. This policy was subject of scrutiny throughout the Local Plan examination process and subject to various rounds of public engagement.</p> <p>The policy contains specific reference to accounting for local context and distinctiveness.</p>
	<p>General Comments</p>	<p>This section contains duplicate comments. For detailed responses to the range of comments made, please see above.</p>

	<p>As on the design guide these are:-</p> <p>Appearance:</p> <p>The document appears unfinished. A foreword is missing, evidenced by the text box. There are spelling mistakes in the text.</p> <p>The keys to plans do not match the hatches, colours and line types shown on the plans.</p> <p>This is obviously confusing and makes the reader question the accuracy and professionalism of the document and what authority it will have in guiding or regulating planning submissions and developers.</p> <p>The language used in the document is woolly and heavily caveated. Caveats within a lot of these statements continue to dilute the authority of the document and make it meaningless in terms of a design code to be abided by.</p> <p>This document is titled as a 'masterplan' but does not provide a masterplan of the site. There are indicative schematics or the broad-brush concepts which contradict each other.</p> <p>Infrastructure:</p> <p>The lack of focus on the infrastructure and access to site and how this will facilitate the construction phasing shows no understanding or consideration of the impact on the existing community.</p> <p>The phasing of the construction of individual parcels contradicts the highway infrastructure and access hierarchy. It puts the emphasis on the existing limited infrastructure supporting phases 1 and 2 before a connected central spine road (primary street) is provided. It is noted that the vehicular access from Ryecroft Lane and Woodland Gardens will be restricted but this will not be possible if there is no primary route out onto Huddersfield Road. This could impact the exiting</p>	
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	<p>community for a number of years given an estimate of 11 years for the construction period is given in the document.</p> <p>How will the construction traffic navigate the existing streets given the size of plant and material requirements to construct the number of properties in the initial phases?</p> <p>Services:</p> <p>There is no mention of the existing services infrastructure within the document. How will the development be serviced in terms of gas, electricity, foul and surface water drainage?</p> <p>Given the size of the development, will this require a major installation and upgrade in terms of gas supply, electric supply and sewerage.? Will this require a branch off Huddersfield Road which would change the emphasis on which phases should be delivered first?</p> <p>In the current proposal, how will the initial phases be serviced?</p> <p>Noting the topography of the land, how will the sewerage requirements be met? The existing infrastructure adjacent to the proposed development will only be sized to accept the current properties. Noting the previous greenbelt and lack of development, additional capacity will have not been considered. An additional 680 properties will require a significant upsize in capacity.</p> <p>Where will these new runs or connections be made given the fall of the land and location of the railway track?</p> <p>Would the sewage have to be pumped up to the interface with Huddersfield Road?</p> <p>Drainage:</p> <p>The current topography of the site would indicate that the surface water flows will fall from southwest to northeast but</p>	
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	<p>with a crossfall to the north which will impact on the existing properties to the north if not addressed.</p> <p>Due to the density of housing proposed in these areas there does not appear to be sufficient space to mitigate the surface water flows through attenuation or SUDS.</p> <p>In having the initial parcels and phases in this area, they will have to deal with the flows from across the site which collect in this area until the later phases are developed.</p> <p>Where will the outfalls from the site connect with the existing infrastructure given the topography of the site and the railway being between the site and the River Calder?</p> <p>Construction:</p> <p>How will the impacts on the existing community and surrounding habitat be mitigated given the location of the initial phases? Traffic movements into and out of the site would seem prohibitive given the limited accessibility. How will the necessary construction equipment and materials for the initial houses be brought in without an adverse impact on the existing community? An access from Huddersfield Road does not appear to have been considered.</p> <p>Noise and pollution in and around the site would also have to be mitigated.</p> <p>How will the impact on the existing habitats to be preserved be mitigated?</p>	
<p>1341747</p> <p>Quod Emma Lancaster</p>	<p>THMP32</p> <p>Doc - THMP32_Representations to Thornhills Masterplan SPD_Quod_Emma Lancaster_COMMENTS.pdf</p> <p>Representations to Thornhills Garden Community Masterplan SPD</p>	<p>Comment noted.</p>

	<p>SEPTEMBER 2023</p> <p>1 Introduction</p> <p>1.1 These Representations are prepared on behalf of England Homes and submitted in respect of the Thornhills Garden Community Masterplan Supplementary Planning Document("SPD"), which is the subject of public consultation by Calderdale Metropolitan Borough Council ("CMBC").</p> <p>1.2 England Homes represent several landowners with holdings in the northern part of the Thornhills Garden Suburb Allocation, annotated M, O and E (Gibson, Richmond, and Hare) on the Land Ownership and Availability Plan at Appendix 1.</p> <p>1.3 England Homes support CMBC's aspiration to deliver a sustainable new community at Brighouse founded on the garden settlement principles identified by the Town and Country Planning Association and which can help meet the identified housing needs of the area and deliver key infrastructure benefits to the local community in accordance with the recently adopted Local Plan.</p> <p>1.4 However, as they consistently highlighted throughout the preparation and examination of the Local Plan, to deliver the allocation in full a comprehensively planned scheme is required. This must be built on meaningful collaboration and agreement between all landowners, as well as equalisation principles.</p> <p>1.5 These concerns persist in relation to the supplementary planning documents that have now been prepared to build on the Local Plan's policies and provide more detailed advice or guidance on how they should be applied in decision-making.</p> <p>1.6 These Representations:</p>	
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	<p><input type="checkbox"/> Build on the key matters raised by England Homes during the preparation and examination of the Local Plan and</p> <p><input type="checkbox"/> Respond to the specific matters raised in these current consultations.</p>	
	<p>1.7 It is understood that the Local Plan is the subject of an ongoing legal challenge, brought by Clifton Neighbourhood Forum¹. England Homes reserves the right to make further representations to the SPD once the outcome of that challenge is understood and/or should any amendments be made to the Masterplan or supporting text in the SPD as an outcome of public consultation.</p> <p>¹ On August 25, 2023, Deputy High Court Judge Karen Ridge granted permission to the Clifton Neighbourhood Forum's request to challenge Calderdale Council's Local Plan. Update 2 - High Court gives green light to Judicial Review of Calderdale Local Plan https://www.crowdjustice.com/case/reject-calderdale-local-plan/</p>	
	<p>2 Background</p> <p>2.1 The Local Plan allocates two Garden Suburbs. This approach, which aims to meet the majority of the Borough's housing needs through the delivery of two strategic sites, was adopted on the basis that focusing development on a smaller number of strategic allocations will satisfy the Borough's housing need whilst providing sufficient scale to deliver a planned 'garden village' layout with enhanced local facilities and infrastructure.</p> <p>2.2 To provide reassurance that the Southeast Calderdale Garden Suburb approach is a deliverable and sustainable way to proceed, CMBC commissioned the Strategic Vision for Southeast Calderdale ("SVSEC").</p> <p>2.3 The SVSEC and the associated spatial approach to development was subsequently presented to Members at</p>	<p>Comment noted.</p>

	<p>various stages of the Local Plan process including Full Council, Cabinet, and Local Plan Working Party meetings. A series of public workshops in different locations around Calderdale were also held.</p> <p>2.4 Throughout this process, CMBC have continuously reiterated that the Garden Suburbs are a “key opportunity for truly sustainable and transformational growth” and will be masterplanned along the lines established through the Garden Village principles.</p> <p>2.5 In 2017, England Homes prepared a Vision Document for the Thornhills Garden Suburb. This provided an appropriate land use framework to underpin a masterplan for the allocation based on the key principles established by the Garden Village, namely:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Generous provision of green space <input type="checkbox"/> Integrated and accessibly transport systems <input type="checkbox"/> A range of housing types and tenures <input type="checkbox"/> Well-designed, characterful homes <input type="checkbox"/> Within easy community distances of jobs <input type="checkbox"/> Provision of community facilities and infrastructure as part of the development. 	
	<p>2.6 In early 2021 England Homes engaged with a consultation undertaken by ID Planning (who represent several of the other landowners with interests at Thornhills) on a Development Framework Plan (“DFP”). They expressed concern that (inter alia):</p> <ul style="list-style-type: none"> <input type="checkbox"/> Not all landowners had been consulted or involved in the preparation of the DFP. <input type="checkbox"/> The DFP did not fully utilise the development potential of the Site and further residential development opportunities could be 	<p>Comment noted.</p>

	<p>identified in the northern and particularly the western part of the allocation.</p> <ul style="list-style-type: none"> □ The DFP would result in an uneven balance of development which was heavily tilted towards dense development in the eastern area of the allocation. □ As a result, the development was more akin to an urban extension as opposed to a Garden Village, whereby the principle is to provide an even distribution of a generous, accessible, and good quality green and blue infrastructure throughout the allocation. □ The intended approach to phasing would mean early phases of development had an unacceptable interrelationship with the remainder of the allocation and would not engender a development genuinely based on Garden Village principles (which would place a significant burden on other landowners whose land is generally shown as being set aside for low density uses or areas of amenity). □ If the allocation is not comprehensively planned and delivered there is a real and substantial risk that later phases will be required to bear disproportionate costs, to the extent that they would become undeliverable. 	
	<p>2.7 In parallel, CMBC and ID Planning had agreed a “roof tax” approach for the site, which was discussed at the Stage 2 Hearings for the Local Plan. The roof tax was agreed between them in isolation, without engagement with the other landowners to confirm their views on viability.</p> <p>2.8 Later in 2021, CMBC commissioned JTP to prepare the Masterplan which now forms the basis of the draft Masterplan SPD.</p>	<p>This is not (as suggested) a bilateral approach which has only been agreed between the Council and ID Planning - the roof tax approach has been endorsed by the Inspector and informs the policy approach set out in the Local Plan - the SPD provides further guidance on the Local Plan policies.</p>

	<p>2.9 The spatial frameworks which underpin the Vision Document prepared by England Homes and the Masterplan now presented by CMBC differ little in reality.</p> <p>2.10 However, two key tenets of the approach to delivery that was advocated by England Homes were (i) meaningful collaboration between all landowners with interests at the site and (ii) the need for there to be an agreed approach/mechanism to land values/equalisation.</p> <p>2.11 It remains England Homes' strongly held view that these tenets are essential if there is to be any realistic prospect of comprehensive delivery of the Garden Suburb.</p> <p>2.12 However, as detailed later in these Representations, CMBC have continued to exclude some landowners from the masterplanning process. Recently, England Homes sought reassurance from CMBC (via questions to Cabinet, and then a Freedom of Information request) that Officers and their consultants had been engaging equally with all landowners. However, Cabinet dismissed the questions (stating they did not "recognise" the concerns) and CMBC declined to provide any of the information sought via the request made in accordance with the Freedom of Information Act.</p> <p>2.13 It also remains that there is still no mechanism in place to ensure that all landowners are properly recompensed for making their land available as part of the Garden Community.</p> <p>2.14 The likely consequence of the latter in particular is that large tracts of land will not be made available during the Local Plan Period and the Garden Community will never be delivered in accordance with either the Masterplan or Garden Settlement Principles.</p>	
	<p>3 Masterplan SPD Preparation</p>	<p>Comment noted</p>

	<p>3.1 The consultation document details that the SPD has been prepared over a period of approximately 18 months, commencing in December 2021.</p> <p>3.2 It asserts that the process has involved input from key stakeholders, representatives of public sector agencies, the landowners and their representatives, and members and officers of CMBC in two key stages:</p> <ul style="list-style-type: none"> □ Stage 1 (December 2021-February 2022) included (para 1.2.6) meeting with landowners and their representatives to understand their objectives and aspirations. □ Stage 2 (March 2022-June 2023) included (para 1.2.7, 4th bullet) Developing key design code guidance in collaboration with landowners and their representatives to facilitate early development of complementary detailed planning applications that will reflect the masterplan and Design Code and thereby simplify the approvals process. 	
	<p>3.3 By all accounts, CMBC and their consultants have failed to include all landowners and/or their representatives in the way that is claimed in the SPD (as noted above) and the statements made in the SPD are false.</p> <p>3.4 The only engagement that has taken place with England Homes² (and/or directly with the Gibsons, Hares and Richmonds) is as follows:</p> <ul style="list-style-type: none"> □ February 2022 – virtual presentation of the Masterplan by CMBC and JTP. England Homes (and landowners they represent) were not allowed to ask questions about the Masterplan or the process for its preparation. □ August 2022 – progress presentation given, led by CMBC’s financial viability consultant. The landowners that England Homes represents were invited to a second presentation, alongside Mr Ibberson, who owns parcel P on the plan at Appendix 1) with the other landowners attending an earlier, 	<p>Following on from the presentation in August 2022, a meeting was held on 11th October with John England to discuss landowner co-ordination and delivery arrangements on the allocation. Furthermore, in January 2023, the officers emailed all landowners and their representatives with a copy of the draft masterplan and provided an opportunity for parties to make comment, prior to formal consultation. The email included the following wording:</p> <p>“should you require any further clarification or wish to make comment at this stage, please do so in writing and submit to spatial.planning@calderdale.gov.uk. “</p> <p>In response to the information provided in January, a series of questions were asked of the Council on 21 March 2023, and a written response was provided by the Council on 30 March.</p>

	<p>separate presentation. Like the presentation in February 2022, questions about the Masterplan process or the Masterplan itself were not allowed / responded to.</p> <p>3.5 A copy of Masterplan itself was only provided by CMBC to England Homes (despite numerous earlier requests for such) in January 2023. At that time, Officers indicated that the Masterplan was being shared with landowners “for information only”, and that further modifications were likely to be required prior to it being subject to more formal, public consultation as part of the SPD process for the site.</p> <p>3.6 This consultation is, therefore, the first opportunity that England Homes and the landowners they represent have had the opportunity to provide any feedback on the Masterplan.</p> <p>3.7 None of the evidence that had supported the Masterplan’s preparation was shared with England Homes at that point, albeit Officers indicated their intention to publish it as part of the forthcoming consultation on the SPD (i.e. the consultation these Representations respond to). It remains, however, that the evidence is not publicly available.</p> <p>3.8 As England Homes has sought to stress throughout the Local Plan process and via subsequent correspondence with CMBC, the agreement of all affected landowners to the form of development which is shown by the Masterplan is critical if there is to be any prospect of comprehensive delivery of the allocation being achievable.</p> <p>3.9 England Homes strongly object to the Masterplan in its current form on the basis that it is not a product of meaningful engagement with all affected landowners.</p> <p>² Other than correspondence from Officers, which has only ever been in response to written requests from / on behalf of these parties for information.</p>	
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	<p>Green Infrastructure</p> <p>Principles</p> <p>3.10 As outlined in the Town and Country Planning Association's Garden City Principles (and noted at Paragraph 1.3.12 of the SPD) Garden Communities are intended to represent principles of (inter alia) "plentiful open space".</p> <p>3.11 Accordingly, the SPD commits (see Paragraph 1.3.13 – 1.3.14) to "a mosaic of landscape spaces, all easily and safely accessible by cycling and walking" and "development that enhances the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains".</p> <p>3.12 It also states (at Paragraph 1.3.24), "The masterplan for the Garden Community is formed around a network of green spaces incorporating existing ecological features such as hedgerows and woodland, while providing opportunities for the creation of a range of different habitat types within a variety of formal and informal landscape spaces."</p> <p>3.13 Section 4 of the SPD then provides further detail on the green infrastructure strategy:</p> <ul style="list-style-type: none"> □ Paragraph 4.12: "The masterplan is landscape led, seeking to retain and enhance the best aspects of the existing landscape and ecology through a network of open spaces with a variety of uses, creating a mosaic of habitats. Residents will have easy access to these green spaces, which will also accommodate walking and cycling routes, making active travel the preferred choice and promoting health and wellbeing." □ Paragraph 4.4.1: "The landscape strategy creates a network of open spaces throughout the site, providing a range of characters and uses to create a varied and attractive environment accessible to new and existing residents." 	<p>Comment noted.</p>
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	<p>3.14 Section 5 of the SPD then continues to emphasise the importance of green infrastructure delivery as part of the Masterplan:</p> <p>□ Paragraph 5.5.1: “The allocation will provide a network of multifunctional green spaces, including parks and amenity areas, community growing areas, hedgerows and other green links. The network of integrated green spaces and green corridors will link with the open countryside beyond the Garden Community.”</p> <p>3.15 The Masterplan identifies an area of Amenity Greenspace to the north-west of the Garden Community. This area is, for the most-part, owned by landowners represented by England Homes. It is currently farmed, providing an important source of income for these landowners.</p> <p>3.16 The definition of Amenity Greenspace is that set out in the Local Plan i.e. open land, which is often landscaped, that makes a positive contribution to the appearance of an area or improves the quality of the lives of people living or working in the locality. It is intended to provide opportunities for activities such as sports.</p>	
	<p>3.17 Whilst the SPD suggests there is no requirement for public access across the land identified as Amenity Greenspace in the Masterplan, clearly these important objectives cannot be secured without such access being given and/or the land being improved with additional planting or works that would make it suitable sports activities. Indeed, the SPD suggests that planning obligations will be used to fund <i>“the creation of new routes across the Amenity Greenspace, subject to detailed network assessments of needs.”</i></p>	See below for response regarding Amenity Greenspace.
	Delivery	

	<p>3.18 The affected landowners represented by England Homes will not allow access across their land (beyond the existing PROW network), undertake additional landscaping, or make their land available for recreational use without its vital role in the Masterplan being properly recognised. Arrangements must be put in place for proper financial compensation for the loss of income that would result from it performing the Amenity Greenspace role which is intended by the SPD.</p> <p>3.19 Notwithstanding the above, England Homes fully endorses the Masterplan's intended approach to the delivery of Open Space more generally, which is confirmed at Paragraph 6.2.21: <i>"Open Space will be delivered incrementally by the developers as part of the build out of each phase. While provision will largely be on-site, an off-site contribution will be required for the provision of playing pitches and sports facilities."</i></p> <p>3.20 This approach will ensure that each phase of development provides appropriate open space to meet the needs of future residents, and that public open space is distributed equitably across the whole of the Garden community.</p>	<p>Currently there is no policy or evidence basis for securing additional public access across the land identified as Amenity Greenspace. This being the case the Council has concluded that the reference to the possible creation of new routes across the Amenity Greenspace should be deleted.</p> <p>There is also no need to 'improve' the land in order that it functions as Amenity Greenspace so there is no basis for securing developer contributions and no access is required.</p> <p>Amendments will be made as follows:</p> <p>Para 5.5.14 of the Thornhills Garden Community Masterplan SPD.</p> <p>And same deletion in Principles of development box 5.5.15 (page 35).</p> <p>The Amenity Greenspace has been identified due to its contribution to the amenity value and character of the wider allocation and existing settlement. As indicated above, no additional access is, or landscape enhancements are necessary in order to ensure it performs this function.</p> <p>A continuation of the existing uses on the land would be compatible with its status as Amenity Greenspace. Accordingly, there will be no loss of income to the landowners as suggested in paragraph 3.18 and no basis for an 'appropriate incentive' to be offered to landowners can be identified.</p>
	<p>Biodiversity</p> <p>3.21 England Homes also supports the intended approach to delivering biodiversity net gain through the development, which is set out at Paragraph 5.5.10, <i>"For phased developments, it must be demonstrated how each phase will reach a minimum 10% Biodiversity Net Gain. Where early phases have secured an excess of biodiversity units, they may be counted towards</i></p>	<p>Comment noted.</p>

	<i>the requirements for subsequent phases however, it must be clear who is legally responsible for the delivery, management, monitoring and maintenance of those units.”</i>	
	<p>Self and Custom Build</p> <p>3.22 Paragraphs 5.2.14-5.2.19 of the SPD deal with self-build and custom housing.</p> <p>3.23 5.2.14 is inconsistent with the Self and Custom Build SPD which was recently consulted upon by CMBC, which proposed “that housing numbers all planning applications on land within LP1463 will be assessed cumulatively and self-build provision concentrated in the identified places” (see Paragraph 3.9).</p> <p>3.24 CMBC has failed to provide explanation or justification for the proposed location of the self and custom build plots (which are a lower value residential use) within the Thornhills Garden Community.</p> <p>3.25 Unlike at Woodhouse, these are all in a single area of the site and will not be delivered as part of each phase of development. There is no justification for adopting a different approach at Thornhills set out in the SPD.</p> <p>3.26 Especially concerning, however, is that all of the plots have been located on land owned by those who CMBC have excluded from any and all meaningful discussions relating to the development of the Masterplan – i.e. those represented by England Homes.</p> <p>3.27 This approach places the lowest value residential development plots on these excluded landowners’ land without any mechanism being in place to compensate them in recognition of the fact this will enable a greater proportion of market housing on other parts of the site.</p> <p>3.28 Notwithstanding this concern, the topography in the part of the site which has been selected for self and custom build</p>	<p>Upon phased submissions, the cumulative numbers (existing supply) will be assessed against the demand in the CSB register at the time of application in accordance with Policy HS5 – Self-Build and Custom Housebuilding.</p> <p>The designated CSB plots are located adjacent to the existing settlement as identified on the framework plan. It is considered reasonable and necessary that these plots are not released for alternative types of housing until the last phase of delivery.</p>

	<p>housing is more challenging and will, by virtue of its location, be delivered later in the Plan Period.</p> <p>3.29 The intended approach means that inexperienced developers will only have the option on building on more challenging sites, which will inevitably result in additional expense. Such constraints may well deter first-time housebuilders. Further, it means that Local Plan's aspirations to meet un-met demand for such self-build opportunities will not be met for some time, if at all.</p> <p>3.30 Whilst 5.2.18 makes provision for alternative types of housing to be delivered in these parts of the site, this is not until the very last phase of the allocation has been completed. Given the anticipated build-out of the site, this could mean that plots in the centre of site are left undeveloped for some 25 years (plus). CMBC must consider introducing a mechanism by which (inter alia) delivery, market conditions and/or financial viability can be considered, and the development of these plots for alternative (residential) uses considered via the determination of planning applications.</p>	
	<p>Phasing and Delivery</p> <p>3.31 England Homes fully endorses the intended approach to piecemeal developments, which is set out at Paragraph 6.1.8. This will ensure high quality, cohesive development is delivered.</p> <p>3.32 As set out earlier in these Representations, England Homes also supports the intended approach to open space delivery. This is reiterated at Paragraph 6.2.21, which states that <i>"Open Space will be delivered incrementally by the developers as part of the build out of each phase. While provision will largely be on-site, an off-site contribution will be required for the provision of playing pitches and sports facilities."</i></p>	See below response regarding Collaboration Agreements.

	<p>3.33 England Homes also fully supports the intention set out at Paragraphs 6.5.1 – 6.5.3 (and, accordingly, also the intended approach to planning application validation set out at Paragraphs 8.2.3 and 8.2.4) that a Collaboration Agreement (“CA”) is required between all parties at Thornhills Garden Community which, as a minimum will include:</p> <ul style="list-style-type: none"> <input type="checkbox"/> A general commitment to cooperate to deliver the development in accordance with the Masterplan, to facilitate comprehensive development. <input type="checkbox"/> Each party to enable rights of access/egress for adjoining landowners and to avoid ransom. <input type="checkbox"/> Agreement to dedicate land for shared infrastructure (including spine roads, school, community facilities, strategic green space, and strategic drainage infrastructure) in accordance with the SPD requirements. <input type="checkbox"/> Arrangements to ensure that highways and services media are constructed to edge of boundaries. <input type="checkbox"/> Agreement to comply with the relevant requirements of planning permissions including section 106 agreements. <p>3.34 England Homes has sought to encourage CMBC and other landowners to progress a CA for some time, believing it critical to ensuring the successful delivery of the allocation.</p> <p>3.35 Notwithstanding, the commitment at Paragraph 6.5.2 should be strengthened via the removal of the text which is struck through here: “on submission of any planning application, the LPA will need to be satisfied that a legally binding CA has been entered into by all relevant landowners that will provide sufficient reassurance to the LPA that the delivery of key elements of the rest of the Garden Community can be secured</p>	
	4 Representations	

	<p>4. first opportunity that England Homes and the landowners they represent have had the opportunity to provide any feedback on the Masterplan.</p> <p>4.2 As England Homes has sought to stress throughout the Local Plan process and via subsequent correspondence with CMBC, the agreement of all affected landowners to the form of development which is shown by the Masterplan is critical if there is to be any realistic prospect of comprehensive delivery of the allocation being achievable.</p> <p>4.3 England Homes strongly object to the Masterplan in its current form on the basis that it is not a product of meaningful engagement with all affected landowners.</p>	<p>See above comment in response to point 3.3 of representation.</p>
	<p>4.4 The Masterplan identifies an area of Amenity Greenspace to the north-west of the Garden Community. This area is, for the most-part, owned by landowners represented by England Homes. It is currently farmed, providing an important source of income for these landowners.</p> <p>4.5 Whilst the SPD suggests there is no requirement for public access across the land identified as Amenity Greenspace in the Masterplan, clearly the intended role of the land cannot be secured without such access being given and/or the land being improved.</p>	<p>Currently there is no policy or evidence basis for securing additional public access across the land identified as Amenity Greenspace. This being the case the Council has concluded that the reference to the possible creation of new routes across the Amenity Greenspace should be deleted.</p> <p>There is also no need to 'improve' the land in order that it functions as Amenity Greenspace so there is no basis for securing developer contributions and no access is required.</p> <p>Amendments will be made as follows:</p> <p>Para 5.5.14 of the Thornhills Garden Community Masterplan SPD - "and also the creation of new routes across the Amenity Greenspace, subject to detailed network assessments of needs."</p> <p>And same deletion in Principles of development box 5.5.15 (page 35). .</p>
	<p>4.6 To date, the critical role that the Amenity Greenspace will play in delivering a new community which is genuinely based on Garden Settlement principles has not been recognised by</p>	<p>The Amenity Greenspace has been identified due to its contribution to the amenity value and character of the wider allocation and existing settlement. As indicated above, no</p>

	<p>either CMBC or other landowners with interests at the site. Without appropriate incentive for affected landowners, the Amenity Greenspace will not be provided in the way that is envisaged by the SPD, to the detriment of the Garden Community.</p>	<p>additional access is, or landscape enhancements are necessary in order to ensure it performs this function.</p> <p>A continuation of the existing uses on the land would be compatible with its status as Amenity Greenspace. Accordingly, there will be no loss of income to the landowners as suggested in paragraph 3.18 and no basis for an 'appropriate incentive' to be offered to landowners can be identified.</p>
	<p>4.7 Notwithstanding, England Homes fully endorses the Masterplan's intended approach to the delivery of Open Space more generally, which is for it to be delivered incrementally by the developers as part of the build out of each phase. This approach will ensure that each phase of development provides appropriate open space to meet the needs of future residents, and that public open space is distributed equitably across the whole of the Garden Community.</p> <p>4.8 England Homes also supports the intended approach to delivering biodiversity net gain through the development, which is that each phase of development must demonstrate how it will reach a minimum 10% Biodiversity Net Gain, and it must always be clear who is legally responsible for the delivery, management, monitoring and maintenance of the relevant units.</p>	<p>Noted.</p>
	<p>4.9 However, England Homes objects to the intended approach to self and custom-build plots at Thornhills. CMBC has failed to justify why these are all in a single area of the site and will not be delivered as part of each phase of development in accordance with Policy HS5 of the Local Plan.</p>	<p>See response above.</p>
	<p>4.10 England Homes fully endorses the intended approach to piecemeal developments, which is set out at Paragraph 6.1.8. This will maximise the prospects of high quality, cohesive development being delivered at Thornhills.</p>	<p>Noted.</p>

	<p>4.11 The requirement for a Collaboration Agreement between all parties at Thornhills Garden Community to be entered into is also fully supported by England Homes. Such an approach is essential if comprehensive development of the site as a whole is to be achieved, hence England Homes has sought to encourage CMBC and other landowners to progress a CA for some time.</p>	<p>The reference to 'relevant' landowners in the SPD rather than 'all' landowners is appropriate. Requiring all landowners across the entire Masterplan area to enter into a single CA would be disproportionate, could stymie delivery of the wider Garden Community and would not be necessary to address the policy requirement of Policy IM7 – Masterplanning to achieve comprehensive development. For example, given the anticipated timing of delivery, the central section of the Garden Community is expected to come forward first. It incorporates key Garden Community infrastructure including the spine road, school, formal park and local centre. Given this, it is considered necessary that all landowners in this central section are included within a single CA. This will provide sufficient reassurance to the Council that there are no impediments to the delivery of this central section, (in particular the infrastructure) and will address the policy requirement in Policy IM7 – Masterplanning for comprehensive delivery. The Council does not consider it necessary for this CA to incorporate the Amenity Greenspace to the north-west of the Garden Community as this will perform its function as Amenity Greenspace in the absence of the CA.</p>
<p>1339566 Slow The Flow Jackie Lowe</p>	<p>THMP33 & WOMP55</p> <p>All comments relate to both Woodhouse and Thornhills garden suburbs sites.</p> <p>Slow The Flow is pleased to note the intention to integrate Sustainable Drainage Systems (SuDS) in the form of Green-Blue Infrastructure on these sites, in order to take the opportunity afforded by their development to proactively improve the downstream flooding situation and build on our area's reputation as leaders in these innovative, multi-beneficial techniques.</p>	<p>Some suggestions are outside the scope of the SPD/role of Planning, e.g., property deeds, information within schools.</p>
	<p>There is, however, a need for:</p>	<p>Refer to paragraph 5.6.6 of the Draft Thornhills Garden Community Masterplan document.</p>

	1. Surface SuDS to be a first thought, and integral to the master plans, if it is to be a success on sites of this scale. The plans as shown note 'waterways', but not how water will be held back across the whole site/s, used as part of an attractive and biodiverse landscape, and prevented from reaching these waterways too quickly.	
	2. An additional 'Sustainable Drainage Strategy' plan to be produced for each site, with careful thought and space allocated to water.	The Drainage Strategy as listed in Appendix 2 - Validation Requirements of the Draft Thornhills Garden Community Masterplan SPD will cover details for the proposed SuDS and includes the requirement for a maintenance plan to be provided.
	3. Good quality, robust SuDS implementation and maintenance of the schemes on these sites in the long term.	Refer to 5.6.8 of the Draft Thornhills Garden Community Masterplan SPD .
	4. Establishment of a sufficiently funded, skilled and supported SAB (SuDS Approval Body) within CMBC, to ensure the long term success of the SuDS schemes.	CMBC would welcome the creation of a SAB however this is subject to Section 3 of the FWMA 2010 being enacted by central government. We are awaiting further guidance on this.
	5. Good communication with, and education of, the ultimate property owners/residents, to explain the SuDS scheme, and why maintaining it is important (i.e. do not block swales / hard pave driveways, etc.	
	6. Schools and services that are planned on the site to be key partners, holding resources and information to keep the conversation going and inspire people to do more on their land / keep good practice alive when, inevitably, new people move in.	
	7. Conditions on property deeds, to ensure the fallback that future property owners are made aware of the SuDS schemes through the legal process.	
	8. The use of stronger language in relation to 'green' SuDS (or you will end up with a 'pipe to pond/underground tank' solution, and not the best practice exemplar schemes Calderdale	Throughout development of the masterplan and design code documents, careful consideration has been given to the choice of wording and the implications this may have. The Calderdale Local Plan is ultimately the policy framework upon which these

	deserves). Use 'must/must not or will/will not', and not 'should', in relation to SuDS.	documents are based, any planning application will therefore need to be in conformity with these policies - it cannot go further or introduce policy or reduce the flexibility that a policy often provides.
	<p>9. Notes on particular referenced paragraphs follow:</p> <p>Re. Masterplan Documents</p> <p>Section 5</p> <ul style="list-style-type: none"> • 5.6 – Drainage <p>1. Use MUST (instead of 'should')</p> <p>2. Make reference to how long term awareness and maintenance of the SuDS schemes will be realised (see points above).</p>	<p>As above</p> <p>Beyond the scope of the SPD/planning system</p>
	<p>Section 6</p> <ul style="list-style-type: none"> • Phasing and Delivery <p>Should contain a note about phasing with relation to surface water management, and avoidance of flooding during construction works. Ideally, SuDS to be built first and protected during construction?</p>	Surface Water Management during construction will be pivotal to controlling runoff and pollution during the construction works and the LLFA will require a robust CSWMP from the applicants that covers all phases of the development.
	<p>Section 10</p> <p>Validation checklist should contain reference to SuDS strategy and maintenance plan.</p>	The Drainage Strategy as listed in Appendix 2 - Validation Requirements of the Draft Thornhills Garden Community Masterplan SPD will cover details for the proposed SuDS and includes the requirement for a maintenance plan to be provided.
	<p>Section 11</p> <ul style="list-style-type: none"> • 11.3.3 (Stewardship Responsibilities) <p>Should contain reference to SuDS features.</p>	Refer to 11.3.1 Draft Thornhills Garden Community Masterplan SPD
	<p>Re. Design Code Documents</p> <p>Section 1</p>	The Calderdale Local Plan is ultimately the policy framework upon which these documents are based, any planning application will therefore need to be in conformity with these

	<ul style="list-style-type: none"> • 1.3.2 (Site Opportunities) <ul style="list-style-type: none"> o Existing waterways on the site should be retained as key features within the open space network. <p>MUST be retained and potential additional benefits realised if possible.</p>	<p>policies - it cannot go further or introduce policy or reduce the flexibility that a policy often provides. A delicate balance must be achieved in providing supplementary guidance and avoiding producing a rigid set of parameters that results in an unusable document that could in turn stymie delivery of the Garden Community.</p> <p>Note that an amendment is proposed for this paragraph in response to another comment, to include reference to “enhancement” as well as retention of waterways.</p>
	<p>Section 4</p> <ul style="list-style-type: none"> • 4.1.1.7 - Sustainable Drainage Sustainable drainage systems (SuDS) must be incorporated into the design of spaces to mitigate the impacts of surface water run-off and aid natural attenuation. Wherever possible these should be provided as above ground features in the form of swales, ponds and raingardens, providing attractive landscape features with ecological benefits. <p>Add in reference to use of rainwater harvesting for use in buildings and landscapes.</p>	<p>Rainwater harvesting will be assessed as a potential form of SuDS for the site by the applicant's DS consultant.</p>
	<ul style="list-style-type: none"> • 4.5.4 - SuDS will be used extensively throughout the site to introduce larger areas of water into the landscape and wherever possible, to improve water quality, reduce flood risk and support biodiversity. <p>Section 4.5 is welcome - but bigger isn't always be/er! A network of SuDS features throughout the site, responding appropriately to topography, should be used.</p>	<p>Noted</p>
	<p>Section 5</p> <ul style="list-style-type: none"> • 5.7.3 – Driveways 	<p>Refer to 7.3.11 Draft Thornhills Garden Community Masterplan SPD</p>

	Driveways must be constructed using either permeable surfacing, or with their runoff collected by a surface SuDS feature.	
	<p>Section 6</p> <ul style="list-style-type: none"> • Built Form <p>Should have a section requiring incorporation of rainwater harvesting, and greywater re-use.</p>	Rainwater harvesting will be assessed as a potential form of SuDS for the site by the applicant's DS consultant.
	<p>Section 7.2</p> <ul style="list-style-type: none"> • Character Areas <p>Pleased to see SuDS indicated – but how is water getting to these basins, some of which are the size of houses? Needs to be clear that surface water is integrated within the 'parcels', and that SuDS is not just an 'around the edge' treatment, but must be integrated.</p>	The importance of incorporating and designing in SuDS is mentioned throughout the document, e.g 4.1.1.7, 4.3.11, 4.4.4, 4.5.4
	<p>Section 7.6</p> <ul style="list-style-type: none"> • 7.6.24 Rainwater Goods <p>Should have a second requiring incorporation of rainwater harvesting/discharge to SuDS and not to traditional gullies/underground pipes.</p>	Refer to 9.2.2 and 9.2.5 Draft Thornhills Garden Community Masterplan SPD which require provision of water butts for rainwater harvesting.
	<p>Section 8</p> <ul style="list-style-type: none"> • 8.1.3 . Where required, specified materials must support the wider Sustainable Drainage strategy - for example, by using pervious paving or permeable bound surfacing systems <p>Remove 'Where required'</p>	Noted, to remain.
	<p>Section 9</p> <ul style="list-style-type: none"> • 9.2.5 Water Systems & Management <p>1. Be more ambitious: All buildings MUST include rainwater harvesting for use internally for toilet flushes, washing</p>	It cannot be a requirement to force the use of rainwater harvesting and is for the applicant's DS consultant to review the use of RWH.

	<p>machines etc, as well as external water bu/s for the irrigation of gardens.</p> <p>2. No mention throughout the report, but especially in this section, for the use of grey water systems to reduce the need for chlorinated water (i.e. toilet flushes, washing machines etc.), which has an additional slowing the flow benefit.</p> <p>3. No mention of how water could be collected and made usable for communal allotments and growing areas throughout the site.</p>	
	<p>Additional Note:</p> <p>Slow The Flow's response has focussed on SuDS. However, there are so many opportunities to make these sites an example of how future development could be done – we refer you to a case study from a site in London that started building in 2002 BedZED - the UK's first major zero-carbon community – Bioregional and has a number of years usage to highlight pros/cons, best practice and what they might do differently next me. We hope this may provide some inspiration for other opportunities that may have been missed:</p> <p>BedZED: Key facts</p> <p>Greener construction</p> <p>Local materials: Just over half (52%) of the construction materials by weight were sourced within 35 miles – considerably closer than the construction industry average. The bricks used on the outside walls came from just 20 miles away.</p> <p>Reclaimed products: 3,400 tonnes of construction material, 15% of the total used in BedZED, were reclaimed or recycled products. Nearly all the steel in the building is reused, much of it coming from refurbishment work at Brighton Railway Station.</p>	Noted

	<p>Giving unused land new life: Even the land the eco-village stands on is recycled. It was used for many years for spreading sludge from the nearby sewage works. Warm, comfortable, cheaper-to-run homes</p> <p>Warm, well-ventilated houses: Most of BedZED's homes are heated by the warmth of the sun and highly insulated. Its disncve wind cowls help fresh air circulate.</p> <p>Biomass boiler: While the original wood-powered boiler had to be turned off in 2005 due to technical difficulties, in 2017 a new biomass boiler was installed. Alongside a green electricity tariff, this means BedZED remains true to its zero-carbon vision.</p> <p>Solar panels and energy-efficient appliances: Extensive solar panels provide some of BedZED's electricity, while efficient appliances reduce energy bills.</p> <p>Onsite car club: A major success was the introduction of the first car club to England which has subsequently led to major expansion of the car club network in London and other UK cities.</p> <p>A healthier, happier place to live</p> <p>Mixed sizes and mixed tenure: Homes range from one-bed apartments to four-bedroom houses. Half were sold on the open market, one quarter were reserved for social (low cost) rent by Peabody and the remaining quarter for shared ownership, a lower-cost way of owning a home.</p> <p>Abundant green space: Even though BedZED is a high-density development, most homes have private outdoor space and many have small gardens. The whole development shares a square and a large playing field.</p> <p>Water-saving appliances: Dual-flush toilets, aerated flow taps and shower heads and water efficient washing machines</p>	
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	<p>means the average home uses almost 40% less water than average metered homes in Su/on.</p> <p>Neighbourliness: One of BedZED's biggest successes is that it has created a great community, with car-free streets for children to play and people to chat.</p> <p>Cheaper bills: For one three-person BedZED household using an on-site car club car instead of its own vehicle, we estimated total annual savings in transport, water and energy bills at £1,391 a year compared to an average London household with its own car. That's nearly £4 a day.</p>	
<p>1185621</p> <p>Clifton Village Neighbourhood Forum</p>	<p>THMP34 & WOMP56, WODC29, THDC28</p> <p>Thornhills and Woodhouse Garden Community Masterplan and Design Code SPD Consultation</p> <p>Clifton Neighbourhood Forum</p> <p>Consultation response</p> <p>1. Introduction</p> <p>1.1 This response, by the Clifton Neighbourhood Forum (the Forum), comments on the documents published by Calderdale Council (the Council) on the Thornhills and Woodhouse Garden Community Supplementary Planning Documents (SPD).</p> <p>1.2 In summary, the Forum has significant concerns with the process taken by the Council in consulting on these documents and with further changes in proposals.</p> <p>1.3 The Council has failed to adequately consult with key stakeholders – including local residents and the Forum, in advance of publishing these documents. Whilst the Council may argue that the Forum has no planning function yet, alongside the Woodhouse Residents' Association, the Forum has substantially engaged throughout the consultation process.</p>	<p>The Town and Country Planning (Local Planning) (England) Regulations 2012 require a Local Planning Authority to undertake public consultation on draft SPDs for a minimum of four weeks, and to take account of any comments received in preparing the final documents.</p> <p>Cabinet considered the draft SPD at its meeting of 7th August 2023 and authorised a four-week public consultation in compliance with regulations.</p> <p>Many comments were received from various stakeholders on the allocation of the site in the Local Plan. The issues raised during the Local Plan preparation informed the resulting Site Specific Considerations in Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road, Brighouse and Appendix 1 – Site Number LP1451 – Land between Bradley Wood and Woodhouse Lane, Rastrick, many of which were recommended as Main Modifications by the Inspector, and it is these on which the SPD has built.</p>

	<p>1.4 The failure to adequately engage and consult with local residents is unacceptable and contravenes Policy IM7.</p> <p>1.5 The Council launched the four-week consultation during the summer holidays. The sheer volume of information published (440 pages), particularly as the proposals have, yet again, changed disadvantages meaningful participation.</p> <p>1.6 The Forum remains concerned that the masterplan framework does not follow garden community principles of distributing development across the site and providing on-site facilities.</p> <p>1.7 These SPDs introduce novel policies, these should directly relate to a specific policy in the Development Plan. Failure to do so means trying to bring a new policy in through the SPD process and this is flawed and wrong.</p>	
	<p>2 Legal challenge to Calderdale Local Plan</p> <p>2.1 The Calderdale Local Plan was adopted on 22 March 2023.</p> <p>2.2 The Forum applied to the High Court within six weeks to challenge the plan.</p> <p>2.3 Deputy High Court Judge Karen Ridge, sitting in The High Court of Justice, King's Bench Division Planning Court, ordered on 25th August to grant a Judicial Review into the Calderdale Local Plan.</p> <p>2.4 The Forum calls on Calderdale Council to suspend this consultation pending the outcome of the High Court hearing.</p>	<p>The Council has taken legal opinion in response to the ongoing challenge to the adoption of the Calderdale Local Plan. The Council has been advised that it should continue to develop Supplementary Planning Documents and to determine planning applications in accordance with the Local Plan so long as the Plan remains adopted by the Council.</p>
	<p>3 Missing evidence – roof tax, A641, viability and Calderdale Design Code</p> <p>3.1 The Woodhouse and Thornhills 'strategic site' supplementary planning documents have been released in</p>	<p>See responses below</p>

	isolation, meaning it is impossible to provide meaningful responses in the context of wider local planning policies.	
	<p>3.2 Viability</p> <p>The missing viability evidence prevents effective and meaningful consultation responses. It is impossible to understand the Masterplan and Design Code details without understanding the current viability situation. The omission of developer funding for secondary school places, despite the number of school places generated by the developments, is an example of this.</p>	<p>Throughout the masterplanning process, the Council has commissioned an Infrastructure Delivery Cost Plan and numerous viability assessments. This work attributes costs to the infrastructure necessary for development schemes within the Garden Communities to be funded by future house builder schemes in so far as it is viable to do so. The work also identifies project costs that are of wider benefit which cannot be attributed to a phase schemes.</p> <p>Costs that cannot be allocated to phase plots need to be funded and delivered by the Council. These Council-delivered works are proposed to be funded through prudential borrowing which is capable of recovery via a roof tariff mechanism levied on each new home.</p> <p>The Council's valuation specialist advisors have presented their viability assessment report findings based on proposed tariff rates derived from the capital cost estimates attributed to the critical schemes. These findings confirm that the Garden Communities are viable based on these input assumptions.</p>
	<p>3.3 Roof tax</p> <p>The Forum continues to have significant concerns about the roof tax mechanism and application across all developments in South East Calderdale (not just the 'garden communities' sites).</p>	<p>Costs that cannot be allocated to phase plots need to be funded and delivered by the Council. These Council-delivered works are proposed to be funded through prudential borrowing which is capable of recovery via a roof tariff mechanism levied on each new home.</p>

	<p>3.4 Funding statement</p> <p>The A641 Corridor Improvement Programme (CIP) is heavily dependent on the West Yorkshire Combined Authority (WYCA) for finance despite the business case being of low benefit and only lifted by the strategic sites' land value uplift.</p> <p>It is of significant concern to the Forum that the Council submitted evidence to the Planning Inspector making categorical statements 'Thornhills' was dependent on direct access to/from the A641. However, the A641 road link has since been shelved.</p> <p>During the previous A641 consultation, WYCA acknowledged that they were consulting on a broader range of interventions than they had provisional funding available.</p> <p>The A641 consultation was held before significant construction-price inflation and the issues faced by WYCA, resulting in cancelled, culled and funding reductions for projects.</p> <p>An up-to-date funding statement from WYCA is urgently required; otherwise there is no confidence that the finance is still available to deliver the A641 CIP.</p>	<p>Noted.</p> <p>Comments outside the scope of this SPD.</p>
	<p>3.5 A641 Corridor Improvement Programme</p> <p>There is no update on the A641 CIP progress. The A641 CIP has changed since the Council presented evidence to the Inspector. Considering that the Council subsequently removed some A641 CIP interventions listed in the 2021 IDP (without an updated IDP), it is impossible to understand (and therefore comment on) the potential effectiveness of traffic congestion, movement, and air pollution mitigation.</p> <p>Interventions of significant concern removed from the 2021 IDP include the following:</p>	<p>The Inspector acknowledged in her report on the Local Plan that the details of the A641 scheme are evolving, and that investigations to provide an alternative option to the Thornhills Spine Road were being undertaken, and Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road, Brighouse and Appendix 1 – Site Number LP1451 – Land between Bradley Wood and Woodhouse Lane, Rastrick is accordingly flexible in this regard:</p> <p><i>Unless demonstrated otherwise through an up-to-date Transport Assessment, no more than 680 units shall be delivered in advance of the completion of the critical schemes</i></p>

	<p>BG15: A641 replacement bridge over the River Calder at Huntingdon Road</p> <p>BG10: A641 'Thornhills Garden Suburb' spine road</p> <p>The failure to provide an A641 update simultaneously with this consultation prevents an understanding of possible strategic interventions for both sites. There can be no certainty that the promised interventions will be delivered.</p>	<p><i>listed in the IDP (2021). The IDP is a provisional list and is subject to change as masterplanning work progresses and the A641 business case is developed.</i></p>
	<p>3.6 Current infrastructure delivery plan</p> <p>Despite presenting evidence to the contrary, the Council's Infrastructure Delivery Plan has failed to follow regular updates as promised. The last update published in March 2021, this is unacceptable and means there is no scrutiny of the current infrastructure position in Calderdale.</p> <div data-bbox="394 715 1176 911" style="border: 1px solid black; padding: 5px;"> <p>The latest published infrastructure delivery plan is over 30 months old and cannot be considered reliable to help determine current infrastructure requirements and the potential for scheme delivery.</p> </div>	<p>The Inspector acknowledged in her report on the Local Plan that the details of the A641 scheme are evolving, and that investigations to provide an alternative option to the Thornhills Spine Road were being undertaken, and Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road, Brighouse and Appendix 1 – Site Number LP1451 – Land between Bradley Wood and Woodhouse Lane, Rastrick is accordingly flexible in this regard:</p> <p><i>Unless demonstrated otherwise through an up-to-date Transport Assessment, no more than 680 units shall be delivered in advance of the completion of the critical schemes listed in the IDP (2021). The IDP is a provisional list and is subject to change as masterplanning work progresses and the A641 business case is developed.</i></p>
	<p>4 Thornhills Garden Community – Masterplan SPD</p> <p>Air quality</p> <p>4.1 Considering the importance of air quality, the Forum is concerned that air quality is not an integral part of the masterplan supplementary planning document.</p>	<p>The Council considers that although the Masterplan is based on garden city principles and reference is made throughout to sustainable travel, significant levels of open space, access to community facilities, all of which reduce the need for using the private car and can contribute to improvements to air quality, the Masterplan documents will be amended to ensure that air quality is referenced in the Vision section.</p>
	<p>IM7-Masterplanning</p> <p>4.2 (1.3.19) There has been no Council engagement or meaningful consultation in developing these policies with local communities until the release of these documents. This is</p>	<p>Many comments were received from various stakeholders on the allocation of the site in the Local Plan. The issues raised during the Local Plan preparation informed the resulting Site Specific Considerations in Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road, Brighouse</p>

	<p>unacceptable and has denied the community a right to help shape the proposal.</p> <p>Regarding Clifton, the Forum (registered with the Council in 2018) has continually participated in the examination process. The Council also knows the Clifton Village Community Association (CVCA). The CVCA was identified as a 'Critical Stakeholder' in the Council's National Productivity Investment Fund (NPIF) application for the Clifton Enterprise Park and has not yet been contacted regarding this application.</p>	<p>and Appendix 1 – Site Number LP1451 – Land between Bradley Wood and Woodhouse Lane, Rastrick, many of which were recommended as Main Modifications by the Inspector, and it is these on which the SPD has built.</p> <p>This SPD consultation is an opportunity for all stakeholders to make comment on the draft documents and help shape the final Masterplans and Design Codes.</p>
	<p>4.3 (1.3.20) Reference is made to Open Space, but the Open Space SPD is unavailable. It is impossible to provide meaningful comments on Open Space without this document.</p> <p>Recommendation: Suspend this consultation until the Open Space SPD is available for comment simultaneously</p>	<p>Supplementary Planning Documents provide guidance on the implementation of Local Plan policies. They do not introduce new policy requirements. It is not feasible or considered necessary to prepare all other SPDs prior to the Garden Community Masterplan SPDs. Local Plan policies will apply to all planning applications determined prior to adoption of the other SPDs.</p>
	<p>Local Design Policy</p> <p>4.4 (1.4.7) A Placemaking and Design Guide SPD is referenced but unavailable during this consultation. As the borough-wide document is designed to complement the fundamental principles established in the Garden Communities Masterplan SPD and Design Code SPD, this should be available simultaneously.</p> <p>4.5 (1.4.10) The document suggests the Garden Communities Design Codes have been 'strongly influenced' by National Design Code Guidance; however, there is no mandatory requirement to follow Nationally Described Space Standards.</p>	<p>Supplementary Planning Documents provide guidance on the implementation of Local Plan policies. They do not introduce new policy requirements. It is not feasible or considered necessary to prepare all other SPDs prior to the Garden Community Masterplan SPDs. Local Plan policies will apply to all planning applications determined prior to adoption of the other SPDs.</p> <p>Policy IM7 – Masterplanning requires proposals to adhere to the principles set out in the National Design Guide.</p>

	<p>Recommendation: Suspend this consultation until the Placemaking and Design Guide SPD is available for comment simultaneously</p>	
	<p>Site constraints</p> <p>4.6 (3.1.2/3.1.3) The Forum is concerned that the Council does not recognise existing Clifton and Thornhills dwellings in the identified site constraints. The Council must include robust mitigation measures to preserve existing village and hamlet features. There must be a restriction on building height two maximum of two storeys where development is adjacent to existing development.</p> <p>In addition, to preserve the character of the Thornhills hamlet, there must be a green belt corridor between existing Thornhills hamlet homes and any new development.</p> <p>The Forum remains concerned that the masterplan framework does not follow garden community principles of distributing development across the site and providing on-site facilities.</p> <p>The development is a mass-housing proposal concentrating on one part of the site. It does not reflect garden community design principles.</p>	<p>All new development within the Garden Community will need to demonstrate that it would not result in any significant adverse impact on the living conditions of existing adjacent residents or other occupiers with regard to privacy, daylight and over-shadowing in particular. It must also provide acceptable living conditions for future occupiers in respect of privacy, daylighting and private amenity space. Further guidance standards on privacy, daylighting and amenity space can be found at Annex 2 - Space About Dwellings of the Calderdale Local Plan. The guidance includes recommended space standards that will be applied in assessing residential development proposals.</p> <p>Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road, Brighouse and Appendix 1 – Site Number LP1451 – Land between Bradley Wood and Woodhouse Lane, Rastrick of the Local Plan requires the ‘masterplanning to ensure designs safeguard the character and identity of the Thornhills hamlet and the wooded valley slopes’. Paragraph 7.2.7 of the Draft Thornhills Garden Community Design Guide SPD states that ‘Development will need to sensitively respond to the character of the existing settlement and lane with a more rural, village character along these edges which is likely to be achieved through a combination of landscape screening, reduced density of development and careful selection of housing typologies and layouts’. In addition, please see requirement for a Landscape and Visual Impact Assessment to be submitted with each phased planning application.</p> <p>The Local Plan also contains various policies that will reinforce the requirement of Appendix 1, specifically Policy BT1 – High</p>

		<p>Quality Inclusive Design which ensures schemes respect and enhance the character and appearance of existing buildings and surroundings.</p> <p>Further, while the northern part of the allocation is heavily constrained by factors including topography, proximity to heritage assets and ecological significance, it also ensures that attractive landscape features are maintained and serves to safeguard the character and identity of the Thornhills Hamlet and wooded valley slopes. Please also refer to paragraph 5.5.13 in the Draft Thornhills Garden Community Masterplan SPD for additional detail.</p>
	<p>Land use</p> <p>4.7 (4.2.2) The Forum supports the principle that locating the Primary School near the Local Centre (4.2.3) will support car users for school drop-off and collection.</p>	<p>Comment noted</p>
	<p>Building heights and density</p> <p>4.8 (4.3.1) All new buildings adjacent to existing dwellings MUST be limited to 2 storeys in height, preventing any new development from overwhelming the existing settlements.</p> <p>4.9 (4.3.3) Considering the scale of land available for development across the site, all new developments adjacent to existing dwellings MUST include a Landscape and Visual Impact Assessment (LIVA) to demonstrate that new developments will not disadvantage existing residents.</p>	<p>All planning applications will be assessed against Local Plan Policy BT2 - Privacy, Daylighting and Amenity Space and Annex 2 - Space About Dwellings with regards to residential amenity for new and existing residents.</p> <p>Policy BT2 - Privacy, Daylighting and Amenity Space of the Local Plan provides the policy framework for securing adequate space around buildings.</p> <p>All new development within the Garden Community will need to demonstrate that it would not result in any significant adverse impact on the living conditions of existing adjacent residents or other occupiers with regard to privacy, daylight and over-shadowing in particular. It must also provide acceptable living conditions for future occupiers in respect of privacy, daylighting and private amenity space.</p> <p>Further guidance standards on privacy, daylighting and amenity space can be found at Annex 2 - Space About Dwellings of the Calderdale Local Plan. The guidance includes recommended</p>

		<p>space standards that will be applied in assessing residential development proposals.</p> <p>Appendix 2 - Validation Requirements of the Draft Thornhills Garden Community Masterplan SPD indicates a requirement for a Landscape and Visual Impact Assessment to be submitted as part of a phased planning application. The wording of section 4.3.3 will be strengthened to ensure clarity.</p>
	<p>Building density</p> <p>4.10 (4.3.4) The Forum has significant concerns about applying the minimum density of 30 dwellings per hectare (dph) for the following reasons</p> <ul style="list-style-type: none"> i) Calderdale Local Plan Appendix 1 Site LP1463 states 19dph would be appropriate ii) Calderdale Local Plan Paragraph 19.5 states “There may be circumstances where lower densities are appropriate”. The Forum contends that the Local Plan affords flexibility when designating allocation dph and the strategic sites land areas are of sufficient scale to accommodate lower dph. iii) The allocation was designated with sufficient land to accommodate 19dph iv) Increasing the dph above 19 ignores the garden community principles promoted throughout previous consultations and hearings v) CC99 references Levitt, Bernstein’s Impact on Site Density of Lifetime Homes¹ which found that compliance with lifetime homes policy had the least impact on schemes with below 30 dwellings per hectare and above 60 dwellings per hectare. vi) Increasing the dph above 30 will compromise the ability to deliver dwellings to HS4 Policy on M4(2) Compliance as per the Council’s evidence 	<p>The indicative developable area used to calculate the density was based on constraints such as heritage and ecology. It did not take account of the land required for non-residential uses, such as education, the local centre and open space.</p>

	Recommendation: Upholding policy HS4 must take precedence over applying the minimum 30 dph density on strategic sites	
	<p>4.11 (4.3.5) As noted in paragraphs 4.8 and 4.9, the site interfaces with Clifton MUST be handled sympathetically with building heights restricted to two storeys, and a LIVA MUST accompany every planning application.</p> <p>¹</p> <p>https://www.housinglin.org.uk/_assets/Resources/Housing/OtherOrganisation/Impact_on_site_density_of_Lifetime_Homes.PDF</p>	<p>Refer to Section 7.2 of the Draft Thornhills Garden Community Design Code SPD which sets out that 'development adjacent to boundaries with existing dwellings should not exceed 2 storeys in height'.</p> <p>In addition, all planning applications will be assessed against Local Plan Policy BT2 - Privacy, Daylighting and Amenity Space and Annex 2 - Space About Dwellings with regards to residential amenity for new and existing residents.</p> <p>Appendix 2 - Validation Requirements of the Draft Thornhills Garden Community Masterplan SPD indicates a requirement for a Landscape and Visual Impact Assessment to be submitted as part of a phased planning application. The wording of section 4.3.3 will be strengthened to ensure clarity.</p>
	<p>Access and Movement</p> <p>4.12 (4.5.1) The Omission of the 'Spine Road' from the A641 referred to in the planning hearings is a concern, and there is no evidence of why the Council has omitted this road from the proposals.</p>	<p>The Inspector acknowledged in her report on the Local Plan that the details of the A641 scheme are evolving, and that investigations to provide an alternative option to the Thornhills Spine Road were being undertaken, and Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road, Brighouse and Appendix 1 – Site Number LP1451 – Land between Bradley Wood and Woodhouse Lane, Rastrick is accordingly flexible in this regard:</p> <p>'Unless demonstrated otherwise through an up-to-date Transport Assessment, no more than 680 units shall be delivered in advance of the completion of the critical schemes listed in the IDP (2021). The IDP is a provisional list and is subject to change as masterplanning work progresses and the A641 business case is developed.'</p>

	<p>Housing mix</p> <p>4.13 (5.2.1) The housing mix statement is flawed. Location, site characteristics, and housing needs are known factors. The site mix should be determined now, not left to the developers to influence what they wish to build. The SHMA statement is at odds with the viability assessment site profile, which stated that 50% would be 4(+)-bedroom dwellings.</p> <p>4.14 What work has the Council and developers undertaken to update the Viability Assessment to support this statement?</p>	<p>Refer to Paragraph 5.2.5 of the Draft Thornhills Garden Community Masterplan SPD -Principles of Development Planning applications will be assessed against Local Plan Policy HS3 – Housing Mix, which Paragraph 5.2.1 reflects.</p>
	<p>4.15 (5.2.3) We object to the wording of policy 5.2.3 because it does not accurately reflect policy HS4, which states that residential development should ensure that 100% of units are adaptable and accessible homes. Although there is provision for reducing this provision, the Council demonstrated in document CC101 (HS4 Sensitivity Viability Addendum) that ‘even if 100% of the total number of dwellings were to be built to these standards, the residual roof tariffs would still exceed the required roof tariffs withing both garden suburbs.’</p> <p>Recommendation</p> <div data-bbox="394 954 1216 1329"> <p>5.2.3 Calderdale has an ageing population, and the Garden Communities should play a role in accommodating older households downsizing to smaller homes after their children have left home. Some of this demand may be met by bungalows for which there is a recognised demand. Specialist accommodation is being developed elsewhere in the Borough and could also be provided within the Garden Communities. Generally, people prefer to remain in their homes and adapt as their lifestyles change. Local Plan evidence confirms 100% compliance with Local Plan Policy HS4 is achievable on the Brighouse Garden community</p> </div>	<p>This paragraph does not set out a policy position. Local Plan Policy HS4 – Housing for Independent Living, will apply to all new residential development proposals.</p> <p>The Council agrees with some of the suggested amendments and will make changes to the first two sentences of 5.2.3. Local Plan Policy HS4 – Housing for Independent Living will apply, but the policy recognises there may be reasons for waiving the 100% requirement. The Council does not consider it necessary to make further changes to this paragraph.</p>

	<p>sites, and so it must be a planning requirement that all dwellings MUST comply with Policy HS4</p>	
	<p>Principles of Development</p> <p>4.16 (5.2.5) We object to the wording of policy of 5.2.5 because</p> <ul style="list-style-type: none"> • the Council's Local Plan Viability Sensitivity evidence has already confirmed <p>100% of new dwellings can be built compliant to M4(2)</p> <ul style="list-style-type: none"> • Viability assessments have been undertaken for the strategic sites (CC101) <p>Recommendation</p> <p>5.2.5 [Final bullet point]</p> <div> <p>Developments MUST make all new homes adaptable and accessible (built to M4(2) or equivalent principles) following Policy HS4.</p> </div>	<p>The wording of the final bullet point reflects Local Plan Policy HS4 – Housing for Independent Living. There may be reasons, other than viability, for waiving the 100% requirement.</p>
	<p>Principles of Development</p> <p>4.17 (5.2.10) The Forum objects to bullet point 3 'Development of affordable bungalows', because the notion that one affordable bungalow is worth two affordable homes is unacceptable. This deviation from Local Plan policy</p>	<p>The possibility of substituting bungalows for conventional houses is contained in the current informal guidance (Affordable Housing Supporting Guidance 2018) which provides guidance to developers on meeting the Borough's affordable housing needs:</p>

	<p>requirements was not included in published Viability assessments or previous sensitivity evidence.</p> <div data-bbox="394 277 1216 451"> <p>The ability for developers to substitute one affordable bungalow for two affordable houses must be deleted from bullet point 3.</p> </div>	<p>“9.9 <i>The Council may encourage developers to build out bungalows on a 2 for 1 basis; meaning for every 2 houses to be built they will instead, accept a contribution of 1 bungalow. This will be reviewed on a site by site basis- taking into consideration the location, accessibility and surrounding facilities.”</i></p> <p><i>The clause was included because there is a consistent need for bungalows expressed in the choice based letting system for social housing, yet developers are reluctant to build bungalows because of the extra land take and costs involved.</i></p> <p><i>Although the adopted Local Plan does not specifically refer to this provision, paragraphs 19.39-19.41 allows discretion in the details of affordable housing provision in private development making it clear that it is important to balance affordable housing supply with demand for different types (19.41) based on evidence in the current SHMA . Both the 2015 and 2018 SHMA points to an increased need to accommodate older and disabled households. Some of this may be met by development of specialist units such as Extra care housing but a substantial proportion may also be met by the development of bungalows especially if these are built to M4(2) standard”.</i></p>
	<p>Local Centre and Community Facilities</p> <p>4.18 (5.3.1) The Local Centre and school provision must be constructed at the start of development to minimise impact on existing communities.</p> <p>4.19 (5.3.3) The Forum is concerned that primary school provision has been halved. Without updated site viability assessments, there is no assurance that this has included a reduction in the required roof tax from other Brighthouse housing allocations. Without an updated viability assessment and the Roof Tax SPD, this consultation is flawed.</p>	<p>The need for more certainty relating to the delivery of key items of infrastructure is acknowledged. As such, the phasing strategy of the SPD will be amended to ensure further clarity.</p> <p>Throughout the masterplanning process, the Council has commissioned an Infrastructure Delivery Cost Plan and numerous viability assessments, including a one-form entry primary school. This work attributes costs to the infrastructure necessary for development schemes within the Garden Communities to be funded by future house builder schemes in</p>

	<p>4.20 (5.3.3) The promised healthcare provision is missing, conflicting with Policy IM7</p> <p>4.21 (5.3.4) 'demonstrate that consideration has been given to active travel routes' is a weak statement that lacks substance.</p> <div> <p>Recommendation: A travel plan must accompany each phase to demonstrate how each phase will contribute to active travel.</p> </div>	<p>so far as it is viable to do so. The work also identifies project costs that are of wider benefit which cannot be attributed to a phase schemes.</p> <p>Costs that cannot be allocated to phase plots need to be funded and delivered by the Council. These Council-delivered works are proposed to be funded through prudential borrowing which is capable of recovery via a roof tariff mechanism levied on each new home.</p> <p>The Council's valuation specialist advisors have presented their viability assessment report findings based on proposed tariff rates derived from the capital cost estimates attributed to the critical schemes. These findings confirm that the Garden Communities are viable based on these input assumptions.</p> <p>The actual cost of providing additional provision will be based on market rates at the time of commissioning. Currently estimates are based on the current anticipated size of school and current market rates with an allowance for inflation. These are all variable depending on the prevailing demographics, design requirements and market rates at the time of commission.</p> <p>With regards to healthcare provision on site, see paragraph 6.2.8 in the Draft Thornhills Garden Community Masterplan SPD</p> <p>The Council considers this approach is consistent with Local Plan Policy IM5 – Ensuring Development Supports Sustainable Travel</p>
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	<p>Education provision</p> <p>4.22 (5.4.1) The Forum is concerned that the primary school location/land size might be subject to more detailed feasibility work. The proposal is already half the size stated during the Local Plan Examination (and IDP evidence). At this stage in the planning process, this provision should be finalised and there must not be any further change to the location or education provision.</p> <p>4.23 (5.4.5) Shared sports facilities should not adversely impact adjoining residents through light or noise pollution outside school hours.</p>	<p>The size of provision and the timing of delivery will be calculated based on latest pupil demographics and capacity in local schools, combined with the anticipated additional pupil yield anticipate from the new homes, at the time of commission. These are all variable.</p> <p>Planning applications will be subject to Local Plan Policy EN1 – Pollution Control with reference to light and noise pollution.</p>
	<p>Green Infrastructure</p> <p>4.24 (5.5) Without the Open Space SPD, it is impossible to provide meaningful comment on these proposals</p>	<p>The Open Space SPD will provide more detail on the implementation of Policy GN6 – Protection and Provision of Open Space, Sport and Recreation Facilities, specifically on the issue of on-site and off-site contributions. The draft SPD is currently being prepared, and it is not considered necessary that the draft is available to view, as it will not introduce new policy.</p>
	<p>Development Guidelines – Transport and Highway Infrastructure</p> <p>4.25 (5.7.12) The Forum objects to 5.7.12. Without certainty on the A641 CIP development, there is no meaningful mitigation for impact consequences because of the developments. Both strategic sites MUST contribute to the projects identified, and their contributions must be transparent.</p>	<p>The Infrastructure Delivery Plan is a live document, documenting the infrastructure schemes considered necessary to delivering Local Plan growth. The most recent IDP was presented to the Inspector during the Examination and will be updated again in due course.</p> <p>The Inspector acknowledged in her report on the Local Plan that the details of the A641 scheme are evolving, and that investigations to provide an alternative option to the Thornhills Spine Road were being undertaken, and Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road, Brighouse and Appendix 1 – Site Number LP1451 – Land between Bradley Wood and Woodhouse Lane, Rastrick is accordingly flexible in this regard:</p>

	4.26 Development of the IDP must be open to public consultation and scrutiny, with any subsequent changes justified evidentially.	<i>Unless demonstrated otherwise through an up-to-date Transport Assessment, no more than 680 units shall be delivered in advance of the completion of the critical schemes listed in the IDP (2021). The IDP is a provisional list and is subject to change as masterplanning work progresses and the A641 business case is developed.</i> The IDP is a list of infrastructure required to support the Plan. It is not a requirement of Government that Local Planning Authorities consult on IDPs.
	4.27 The Forum objects to the number of dwellings that may be delivered in advance of IDP interventions. As there is no up-to-date Transport Assessment to verify the justification for delivery of up to 680 dwellings, this number cannot be relied upon. 4.28 The development guidelines fail to address the traffic impacts, and no development should be permitted on either site without a robust transport model and an up-to-date Transport Assessment.	Detailed capacity assessments will be required with each planning application. If there is a severe impact at any junction, then the development will be required to fund mitigating improvement.
	4.29 Because the CSTM is unreliable and inappropriate, transport and highway infrastructure provision is unusable and MUST be updated with an appropriate model subject to independent scrutiny.	The Local Plan Inspector found the transport modelling to be reliable.
	4.30 The Forum has successfully demonstrated to the satisfaction of the High Court that there are issues with the Council's assumptions in applying the CSTM and that these issues will be dealt with in the High Court in due course.	Comment noted.

	<p>Climate Change</p> <p>4.31 (5.9.3) The Future Homes Standard (FHS) and continued improvements to Building Regulations are insufficiently applied in this SPD. It should be an automatic requirement that as the FHS and new Building Regulations are adopted nationally, the Council MUST reflect these requirements in planning permissions on site.</p> <p>4.32 With long lead-in times on introducing new standards, the Council must require developers to incorporate all building regulations and standard changes (FHS) that come into force into any incomplete dwelling at the point of introduction. There must not be a grace period for complying with updated standards.</p>	<p>The Renewable and Low carbon chapter of the Local Plan provides the policy framework relating to developments supporting renewable and low carbon energy. These themes are developed in more technical detail in this and other emerging SPDs, specifically the Renewable and Low Carbon SPD. These documents are set against a national picture where planning policy and guidance is expected to be strengthened through changes to the planning system. Initiatives such as the Future Homes Standard and the ongoing strengthening of the Building Regulations will, for example, require greater levels of energy efficiency and renewable and low carbon energy to be utilised in new developments over the construction period of the Garden Communities.</p>	
	<p>Phasing and Delivery</p> <p>4.33 (6.1.1) The phasing plan is meaningless because it includes no timescales.</p> <table><tr><td>Recommendation: Add timescales to phasing and delivery plan</td></tr></table>	Recommendation: Add timescales to phasing and delivery plan	<p>Refer to Paragraphs 6.1.3 to 6.1.6 of the Draft Thornhills Garden Community Masterplan SPD</p> <p>.</p>
Recommendation: Add timescales to phasing and delivery plan			
	<p>Infrastructure delivery</p> <p>4.34 (6.2.1) The delivery statement fails to acknowledge that it depends on successfully delivering transport and infrastructure interventions. There is no recognition of how landowners will cooperate around equalisation or how the council can be confident in delivery.</p>	<p>The approach to landowner collaboration is set out in Section 6.5 of the Draft Thornhills Garden Community Masterplan SPD and Section 6.3 sets out how the Roof Tax is intended to ensure that the costs of site-wide infrastructure are shared equitably across the Garden Community.</p>	
	<p>Education</p> <p>4.35 (6.2.6) Secondary school provision is missing. Travel mitigation for not providing secondary provision is unclear.</p>	<p>Significant changes in preferencing patterns have occurred which has resulted in far fewer extra district pupils seeking provision within Calderdale. This has released capacity in the Lightcliffe area. Developments in neighbouring Kirklees have also been delayed. Additional capacity will only be provided if required and will be based upon need (not demand) at the time that developments are in the delivery stage.</p>	

	<p>Healthcare</p> <p>4.36 (6.2.8) The Forum objects to the lack of on-site healthcare provision. The Council and site-promoter promised on-site health provision in the hearings, and it is a deep concern to the Forum that increasing existing (stretched) healthcare provision off-site is now being relied upon to fulfil identified requirements (conflicting with the 2021 IDP).</p>	<p>This is explained in paragraphs 6.2.8 and 6.2.9 of the Draft Thornhills Garden Community Masterplan SPD</p>
	<p>Highways</p> <p>4.37 (6.2.13) The suggestion that the 2021 Infrastructure Delivery Plan is a provisional list is of deep concern to the Forum, as the 2021 IDP was relied upon by the Council in their evidence to suggest the strategic sites were deliverable. All changes or updates to the Infrastructure Delivery Plan must be subject to public consultation.</p>	<p>The IDP is a live document, and projects are added and removed as projects progress or evidence shows specific projects are no longer required. This was recognised by the Inspector in her report. It is not a requirement of Government that Local Planning Authorities consult on IDPs.</p>
	<p>On-site highway provision</p> <p>4.38 (6.2.17) This statement lacks detail on the engagement strategy. The Council should amend this statement to mandate that the existing local community in Clifton and Thornhills will form part of all consultations.</p> <p>4.39 (6.2.18) The Forum is concerned that permitting approval to change infrastructure delivery should not be permitted unless a clear statement is made as part of a planning application and subject to public scrutiny before the planning consent is approved.</p>	<p>Any planning application will be subject to mandatory public consultation.</p> <p>Refer to Paragraph 6.2.18 of the Draft Thornhills Garden Community Masterplan SPD which states that ‘any variation must be thoroughly justified...’.</p>
	<p>Developer contributions and funding strategy</p> <p>4.40 (6.3.1) This consultation is disadvantaged because the ‘Roof-tax’ SPD is unavailable.</p>	<p>There is no Roof Tax SPD. The Masterplan SPD provides appropriate additional guidance on how the Garden Community will be delivered, including the approach to the use of developer contributions including the roof tax and other section</p>

		106 obligations see Section 6.3 of the Draft Thornhills Garden Community Masterplan SPD
	<p>4.41 (6.3.2) The Forum strongly objects to the omission of secondary school funding. The Forum considers it financially irresponsible and burdens the Council that landowners and developers (who will profit from development) do not share the costs of secondary school provision.</p> <p>4.42 (6.3.2) As discussed elsewhere, the Forum is concerned that primary school provision charges are not explained in the same detail as presented in the Local Plan examination. An imbalanced split was proposed between the two strategic sites; what evidence is available to confirm this has changed?</p>	<p>Significant changes in preferencing patterns have occurred which has resulted in far fewer extra district pupils seeking provision within Calderdale. This has released capacity in the Lightcliffe area. Developments in neighbouring Kirklees have also been delayed. Additional capacity will only be provided if required and will be based upon need (not demand) at the time that developments are in the delivery stage.</p> <p>The size of provision and the timing of delivery will be calculated based on latest pupil demographics and capacity in local schools, combined with the anticipated additional pupil yield anticipate from the new homes, at the time of commission. These are all variable.</p>
	<p>4.43 (6.3.3) As previously mentioned, the Roof-Tax SPD is missing at the time of this consultation, and so the financial impacts and consequences for the wider Brighouse area remain unclear. It is unacceptable that the Roof-Tax SPD is not available simultaneously.</p> <div style="border: 1px solid black; padding: 5px;"> <p>Recommendations:</p> <ul style="list-style-type: none"> - Suspend this consultation until the Roof-Tax SPD available - Require developer contributions on both sites towards Secondary school provision </div>	As above.
	<p>Stewardship strategy</p> <p>4.44 (7.1) This novel proposal has not been part of any previous proposal and has not been subject to public scrutiny at any point in the Local Plan Examination process. The Forum considers it unacceptable that the Stewardship proposal was not part of any earlier evidence. These Stewardship proposals</p>	The approach is set out in Local Plan Policy IM7 – Masterplanning Part VII

	<p>have yet to be publicly subject to any viability assessment. Where the Council proposes introducing a novel policy, this should directly relate to a specific policy in the Development Plan. Failure to do so means trying to bring a new policy in through the SPD process and this is flawed and wrong.</p> <div data-bbox="394 411 1216 555" style="border: 1px solid black; padding: 5px;"> <p>Recommendation: Where the Council proposes introducing a novel policy, this should directly relate to a specific policy in the Development Plan.</p> </div> <p>4.45 (7.6.1) Estate management charges to be levied on all garden community residents have never been part of the public examination process. The inclusion of a change was not discussed in the examination nor justified in the viability assessment. Is this an admission that the viability assessment evidence was flawed or inaccurate?</p>	<p>The community stewardship approach set out is tried and tested, with demonstrable benefits to residents and the housebuilders. It creates a sense of community and local ownership from the beginning, which is crucial to ensuring a successful new community at this scale.</p>
	<p>APPENDIX 1 – anticipated S106 requirements for each phase</p> <p>4.46 (Stewardship) There is no explicit statement for a Stewardship charge in Local Plan policies IM7, HW4 and GN6. Where the Council proposes introducing a novel policy, this should directly relate to a specific policy in the Development Plan. Failure to do so means trying to bring a new policy in through the SPD process and this is flawed and wrong.</p> <p>4.47 (Programme and Delivery) The build programme should be publicly available and presented as part of any planning application. For transparency, annual monitoring MUST declare conformity with the building programme.</p>	<p>The approach is set out in Local Plan Policy IM7 – Masterplanning Part VII</p> <p>Housing completions will be set out in the Authority Monitoring Report.</p>

	<p>APPENDIX 2 – validation requirements</p> <p>4.48 (Planning Statement) This paragraph is full of errors and needs re-writing</p> <p>4.49 (Landscape Visual Impact Assessment) – MUST be produced for every development adjacent to existing Clifton and Thornhills dwellings.</p> <p>4.50 (11.4.13) This statement is inaccurate. There is at least one parcel of land included within the Thornhills settlement where landowners have not been part of this working relationship.</p> <p>4.51 (11.6.8) ‘Deliver fair benefits that deliver value for money, while helping to integrate the site with the existing local community’ is ill-defined and open to misinterpretation.</p>	<p>As above, the wording of section 4.3.3 of the Draft Thornhills Garden Community Masterplan SPD will be strengthened to ensure clarity.</p> <p>The Council has engaged with all landowners as part of the Local Plan/SPD process.</p> <p>The Council consider this is not an unreasonable statement to make.</p>
	<p>5 Thornhills Design Code Supplementary Planning Document</p> <p>Access</p> <p>5.1 The Forum objects to diluted site-access arrangements. The lack of direct access from the A641 means development is focused on the existing road network and will place a further burden on roads that are already heavily congested. As discussed elsewhere, the CSTM significantly underestimates traffic congestion and the road network variations in this scheme have no supporting reliable evidence.</p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p>The Forum strongly objects to the reduced road and access provision</p> </div>	<p>Strategic modelling was undertaken to inform the access strategy. More detailed junction assessments will be undertaken with future planning applications.</p>
	<p>Vision and Ethos</p>	<p>The Masterplan document sets that the location of development has been constrained by factors including</p>

	<p>5.2 The Forum objects to the suggestion that the proposals follow Garden Community Design Principles. Currently, these are mass-housing proposals focused on part of the site.</p>	<p>topography, proximity to heritage assets and large areas of ecological significance. Refer to Para 4.4.6 of the Draft Thornhills Garden Community Masterplan SPD. The Masterplan aims to deliver a clear movement hierarchy which prioritises active travel, with opportunities for walking and cycling provided through an extensive network of footpaths and cycleways.</p>
	<p>Site constraints</p> <div> <p>5.3 The boundary and setting of all existing dwellings should safeguarded. This MUST be achieved by limiting the building heights to a maximum of 2 storeys adjacent and providing a clear green/wildlife corridor to existing settlements.</p> </div>	<p>The Council considers that the current wording in the SPD documents, alongside Local Plan Policy BT2 - Privacy, Daylighting and Amenity Space and Annex 2 - Space About Dwellings of the Local Plan is sufficient in mitigating impacts on existing properties.</p> <p>Appendix 2 - Validation Requirements of the Draft Thornhills Garden Community Masterplan SPD indicates a requirement for a Landscape and Visual Impact Assessment to be submitted as part of a phased planning application. The wording of section 4.3.3 will be strengthened to ensure clarity.</p>
	<p>Hierarchy of movement</p> <p>5.4 (5.1.2) The hierarchy of movement suggests that the majority of homes will be within 400m of a bus stop. The Forum has no confidence that this is an appropriate statement. A majority could mean as little as 51% of the development. Additional safeguards are required to prevent car dependency. That said, access to a bus stop is irrelevant if the bus provision is weak.</p>	<p>The Primary Road has been designed to accommodate buses, and the stop locations and pedestrian network will ensure that most residents will be within a 400m walk of a stop. The need for developer funding of bus services has been identified.</p>
	<p>Density</p> <div> <p>5.5 (6.1.2) Housing density MUST NOT prevent compliance with policy HS4 Building heights</p> </div>	<p>All planning applications will be determined in line with the Local Plan policies and other relevant SPDs including the Masterplan and Design Code SPDs.</p>

	<p>Building heights</p> <p>5.6 (6.1.4) A LVIA MUST be produced for every 2.5/3 storey application to demonstrate that the design proposals will not have a wider visual impact with existing Clifton, Thornhills and Brighthouse developments.</p>	<p>Appendix 2 - Validation Requirements of the Draft Thornhills Garden Community Masterplan SPD indicates a requirement for a Landscape and Visual Impact Assessment to be submitted as part of a phased planning application. The wording of section 6.1.4 will be strengthened to ensure clarity.</p>
	<p>Identity</p> <p>Green Farm Centre (7.2.5)</p> <p>5.7 The Forum is concerned that detached dwellings will be outside the local centre. Whilst this might appear sensible for land use, it does not promote community adhesion.</p>	<p>The approach to density close to the Local Centre is set out in the Masterplan document paragraph 4.3.4. This is consistent with the approach set out in the Local Plan (Policy HS3 – Housing Mix), and also national planning policy.</p>
	<p>Oak Hill Bank (7.2.6)</p> <p>5.8 Development adjacent to boundaries MUST NOT exceed two storeys in height</p>	<p>The Council considers that the current wording in the SPD documents, alongside Local Plan Policy BT2 - Privacy, Daylighting and Amenity Space and Annex 2 - Space About Dwellings of the Local Plan is sufficient in mitigating impacts on existing properties.</p> <p>Appendix 2 - Validation Requirements of the Draft Thornhills Garden Community Masterplan SPD indicates a requirement for a Landscape and Visual Impact Assessment to be submitted as part of a phased planning application. The wording of section 4.3.3 will be strengthened to ensure clarity.</p>
	<p>5.9 'Respectful relationship' is ill-defined and lacks clarity – there is sufficient land allocated to recognised new development MUST respect the existing settlement boundaries and not cause light or visual amenity loss for existing occupants.</p>	<p>All planning applications will be assessed against Local Plan Policy BT2 - Privacy, Daylighting and Amenity Space and Annex 2 - Space About Dwellings with regards to residential amenity for new and existing residents.</p> <p>Policy BT2 - Privacy, Daylighting and Amenity Space of the Local Plan provides the policy framework for securing adequate space around buildings.</p> <p>All new development within the Garden Community will need to demonstrate that it would not result in any significant adverse</p>

		<p>impact on the living conditions of existing adjacent residents or other occupiers with regard to privacy, daylight and over-shadowing in particular. It must also provide acceptable living conditions for future occupiers in respect of privacy, daylighting and private amenity space.</p> <p>Further guidance standards on privacy, daylighting and amenity space can be found at Annex 2 - Space About Dwellings of the Calderdale Local Plan. The guidance includes recommended space standards that will be applied in assessing residential development proposals.</p>
	5.10 The secondary site access from Thornhills Lane is inappropriate.	The Planning Inspector noted that future Transport Assessment work associated with phased planning applications will provide an opportunity to explore access and mitigation measures in more detail.
	<p>Thornhills Lanes (7.2.7)</p> <p>5.11 Development adjacent to boundaries MUST NOT exceed 2 storeys in height</p>	<p>The Council considers that the current wording in the SPD documents, alongside Local Plan Policy BT2 - Privacy, Daylighting and Amenity Space and Annex 2 - Space About Dwellings of the Local Plan is sufficient in mitigating impacts on existing properties.</p> <p>Appendix 2 - Validation Requirements of the Draft Thornhills Garden Community Masterplan SPD indicates a requirement for a Landscape and Visual Impact Assessment to be submitted as part of a phased planning application. The wording of section 4.3.3 will be strengthened to ensure clarity.</p>
	5.12 The existing Thornhills hamlet is not sufficiently preserved in these proposals, and the Council MUST do more to preserve the unique characteristics by increasing the land buffer and restricting high-density development.	<p>Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road, Brighouse of the Local Plan requires the ‘masterplanning to ensure designs safeguard the character and identity of the Thornhills hamlet and the wooded valley slopes’. Paragraph 7.2.7 of the Design Guide states that ‘Development will need to sensitively respond to the character of the existing settlement and lane with a more rural, village</p>

		<p>character along these edges which is likely to be achieved through a combination of landscape screening, reduced density of development and careful selection of housing typologies and layouts'. In addition, please see requirement for a Landscape and Visual Impact Assessment to be submitted with each phased planning application.</p> <p>The Local Plan also contains various policies that will reinforce the requirement of Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road, Brighouse, specifically Policy BT1 – High Quality Inclusive Design which ensures schemes respect and enhance the character and appearance of existing buildings and surroundings.</p> <p>Further, while the northern part of the allocation is heavily constrained by factors including topography, proximity to heritage assets and ecological significance, it also ensures that attractive landscape features are maintained and serves to safeguard the character and identity of the Thornhills Hamlet and wooded valley slopes. Please also refer to paragraph 5.5.13 in the Draft Thornhills Garden Community Masterplan SPD for additional detail.</p>
	<p>Hartshead Gateway (7.2.8)</p> <p>5.13 The design code does not provide a sensitive response to Jay House Lane and the remaining greenbelt, and additional safeguards to existing features/characteristics including a development buffer, more open space at the front of houses, significantly lower housing densities and restricting building heights MUST be incorporated.</p>	<p>The Council considers that this is covered in sufficient detail for the SPD. Planning application will need to demonstrate how this can be implemented.</p>
	<p>Beck Valley (7.2.9)</p> <p>5.14 All planning applications in this area MUST demonstrate how the unique character of this part of the site is preserved.</p>	<p>The Council considers that this is covered in the SPD. All planning applications will be assessed against Local Plan Policy GN4 – Landscape Part V which requires development to be designed in a way that is sensitive to its landscape setting, retaining and enhancing the distinctive qualities that the landscape area</p>

		In addition, the Draft Thornhills Garden Community Masterplan SPD sets out in Paragraph 1.2.7 that design guidance has been informed by character assessment, national and local policy and best practice guidance.
	6 Woodhouse Masterplan Supplementary Planning Document Air quality <div> 6.1 Considering the importance of air quality the Forum is concerned that air quality is not an integral part of the masterplan supplementary planning document. </div>	The Council considers that although the Masterplan is based on garden city principles and reference is made throughout to sustainable travel, significant levels of open space, access to community facilities, all of which reduce the need for using the private car and can contribute to improvements to air quality, the Masterplan documents will be amended to ensure that air quality is referenced in the Vision section.
	IM7-Masterplanning 6.2 (1.3.19) There has been no Council engagement or meaningful consultation in developing these policies with local communities until the release of these documents. This is unacceptable and has denied the community a right to help shape the proposal.	Many comments were received from various stakeholders on the allocation of the site in the Local Plan. The issues raised during the Local Plan preparation informed the resulting Site Specific Considerations in Appendix 1 – Site Number LP1451 – Land between Bradley Wood and Woodhouse Lane, Rastrick , many of which were recommended as Main Modifications by the Inspector, and it is these on which the SPD has built. This SPD consultation is an opportunity for all stakeholders to make comment on the draft documents and help shape the final Masterplans and Design Codes.
	6.3 (1.3.20) Reference is made to Open Space, but the Open Space SPD has not yet been released. It is impossible to provide meaningful comments on Open Space without this document.	Supplementary Planning Documents provide guidance on the implementation of Local Plan policies. They do not introduce new policy requirements. It is not feasible or considered necessary to prepare all other SPDs prior to the Garden Community Masterplan SPDs. Local Plan policies will apply to all planning applications determined prior to adoption of the other SPDs.
	Local Design Policy 6.4 (1.4.7) A Placemaking and Design Guide SPD is referenced but unavailable during this consultation. As the	Supplementary Planning Documents provide guidance on the implementation of Local Plan policies. They do not introduce new policy requirements. It is not feasible or considered

	<p>borough-wide document is designed to complement the key principles established in the in the Garden Communities Masterplan SPD and Design Code SPD, this should be available simultaneously.</p>	<p>necessary to prepare all other SPDs prior to the Garden Community Masterplan SPDs. Local Plan policies will apply to all planning applications determined prior to adoption of the other SPDs.</p> <p>Policy IM7 – Masterplanning requires proposals to adhere to the principles set out in the National Design Guide.</p>
	<p>Site constraints</p> <p>6.5 (3.1.2/3.1.3) Robust mitigation measures must be included to preserve features. There must be a restriction on building height to a maximum of two storeys where development is adjacent to existing development.</p> <p>The Forum remains concerned that the masterplan framework does not follow garden community principles of distributing development across the site and providing on-site facilities.</p> <p>The development is a mass-housing proposal and does not reflect garden community design principles.</p>	<p>All planning applications will be assessed against Local Plan Policy BT2 - Privacy, Daylighting and Amenity Space and Annex 2 - Space About Dwellings with regards to residential amenity for new and existing residents.</p> <p>Policy BT2 - Privacy, Daylighting and Amenity Space of the Local Plan provides the policy framework for securing adequate space around buildings.</p> <p>All new development within the Garden Community will need to demonstrate that it would not result in any significant adverse impact on the living conditions of existing adjacent residents or other occupiers with regard to privacy, daylight and over-shadowing in particular. It must also provide acceptable living conditions for future occupiers in respect of privacy, daylighting and private amenity space.</p> <p>Further guidance standards on privacy, daylighting and amenity space can be found at Annex 2 - Space About Dwellings of the Calderdale Local Plan. The guidance includes recommended space standards that will be applied in assessing residential development proposals.</p>
	<p>Building heights and density</p>	<p>All planning applications will be assessed against Local Plan Policy BT2 - Privacy, Daylighting and Amenity Space and Annex 2 - Space About Dwellings with regards to residential amenity for new and existing residents.</p>

	<p>6.6 (4.3.1) All new buildings adjacent to existing dwellings MUST be limited to 2 storeys in height. This will prevent new development from overwhelming the existing settlements.</p> <p>6.7 (4.3.3) Considering the scale of land available for development across the site, all new developments adjacent to existing dwellings MUST include a Landscape and Visual Impact Assessment (LIVA) to demonstrate that new developments will not disadvantage existing residents.</p>	<p>Policy BT2 - Privacy, Daylighting and Amenity Space of the Local Plan provides the policy framework for securing adequate space around buildings.</p> <p>All new development within the Garden Community will need to demonstrate that it would not result in any significant adverse impact on the living conditions of existing adjacent residents or other occupiers with regard to privacy, daylight and over-shadowing in particular. It must also provide acceptable living conditions for future occupiers in respect of privacy, daylighting and private amenity space.</p> <p>Further guidance standards on privacy, daylighting and amenity space can be found at Annex 2 - Space About Dwellings of the Calderdale Local Plan. The guidance includes recommended space standards that will be applied in assessing residential development proposals.</p> <p>Appendix 2 - Validation Requirements of the Draft Woodhouse Garden Community Masterplan SPD indicates a requirement for a Landscape and Visual Impact Assessment to be submitted as part of a phased planning application. The wording of section 4.3.3 will be strengthened to ensure clarity.</p>
	<p>Housing mix</p> <p>6.8 (5.2.1) The housing mix statement is flawed. Location, site characteristics and housing needs are known factors. The site mix should be determined now, not left to the developers to influence what they wish to build. The SHMA statement is at odds with the viability assessment site profile which stated 50% would be 4(plus) bedroom dwellings.</p>	<p>Refer to Paragraph 5.2.5 of the Draft Woodhouse Garden Community Masterplan SPD - Principles of Development</p> <p>Planning applications will be assessed against Local Plan Policy HS3 – Housing Mix, which Paragraph 5.2.1 reflects.</p>

	<p>6.9 What work has the Council and developers undertaken to update the Viability Assessment to support this statement?</p>	
	<p>6.10 (5.2.3) We object to the wording of policy 5.2.3 because it does not accurately reflect policy HS4 which states that residential development should ensure that 100% of units are adaptable and accessible homes. Although there is provision for reducing this provision, the Council demonstrated in document CC101 (HS4 Sensitivity Viability Addendum) that ‘even if 100% of the total number of dwellings were to be built to these standards, the residual roof tariffs would still exceed the required roof tariffs withing both garden suburbs’</p> <p>Recommendation</p> <div style="border: 1px solid black; padding: 5px;"> <p>5.2.3 Calderdale has an ageing population, and the Garden Communities should play a role in accommodating older households, downsizing to smaller homes after their children have left home. Some of this demand may be met by bungalows for which there is a recognised demand. Specialist accommodation is being developed elsewhere in the Borough and could also be provided within the Garden Communities. Generally, people prefer to remain in their homes and adapt as their lifestyles change. Local Plan evidence confirms 100% compliance with Local Plan Policy HS4 is achievable on the Brighouse Garden community sites, and so it is a planning requirement that all dwellings MUST comply with Policy HS4</p> </div>	<p>This paragraph does not set out a policy position. Local Plan Policy HS4 – Housing for Independent Living, will apply to all new residential development proposals.</p> <p>The Council agrees with some of the suggested amendments and will make changes to the first two sentences of 5.2.3. Local Plan Policy HS4 – Housing for Independent Living will apply, but the policy recognises there may be reasons for waiving the 100% requirement. The Council does not consider it necessary to make further changes to this paragraph.</p>
	<p>Principles of Development</p> <p>6.11 (5.2.5) We object to the wording of policy of 5.2.5 because</p> <ul style="list-style-type: none"> • the Council's Local Plan Viability Sensitivity evidence has already confirmed 	<p>The wording of the final bullet point reflects Local Plan Policy HS4 – Housing for Independent Living. There may be reasons, other than viability, for waiving the 100% requirement.</p>

	<p>that 100% of new dwellings can be built compliant with M4(2)</p> <ul style="list-style-type: none"> • Viability assessments have been undertaken for the strategic sites (CC101) <p>Recommendation</p> <p>5.2.5 [Final bullet point]</p> <div data-bbox="394 427 1216 564" style="border: 1px solid black; padding: 5px;"> <p>Developments MUST make all new homes adaptable and accessible (built to M4(2) or equivalent principles) following Policy HS4.</p> </div>	
	<p>Principles of Development</p> <p>6.12 (5.2.10) The Forum objects to bullet point 3 ‘Development of affordable bungalows’, because the notion that one affordable bungalow is worth two affordable homes is unacceptable. This is a deviation from Local Plan policy requirements and was not included in any published Viability assessments or previous sensitivity evidence.</p> <div data-bbox="394 837 1216 981" style="border: 1px solid black; padding: 5px;"> <p>The ability for developers to substitute one affordable bungalow for two affordable houses must be deleted from bullet point 3.</p> </div>	<p>The possibility of substituting bungalows for conventional houses is contained in the current informal guidance (Affordable Housing Supporting Guidance 2018) which provides guidance to developers on meeting the Borough’s affordable housing needs:</p> <p><i>“9.9 The Council may encourage developers to build out bungalows on a 2 for 1 basis; meaning for every 2 houses to be built they will instead, accept a contribution of 1 bungalow. This will be reviewed on a site by site basis- taking into consideration the location, accessibility and surrounding facilities.”</i></p> <p><i>The clause was included because there is a consistent need for bungalows expressed in the choice based letting system for social housing, yet developers are reluctant to build bungalows because of the extra land take and costs involved.</i></p> <p><i>Although the adopted Local Plan does not specifically refer to this provision, paragraphs 19.39-19.41 allows discretion in the details of affordable housing provision in private development making it clear that it is important to balance affordable housing supply with demand for different types (19.41) based on evidence in the current SHMA . Both the 2015 and 2018 SHMA points to an increased need to accommodate older and</i></p>

		<i>disabled households. Some of this may be met by development of specialist units such as Extra care housing but a substantial proportion may also be met by the development of bungalows especially if these are built to M4(2) standard”.</i>
	<p>Local Centre and Community Facilities</p> <p>6.13 (5.3.1) The Local Centre and school provision must be constructed at the start of development to minimise impact on existing communities.</p> <div> <p>6.14 (5.3.3) The Forum is concerned that without an updated viability assessment and the Roof Tax SPD, this consultation is flawed.</p> </div> <p>6.15 (5.3.3) The promised healthcare provision is missing, conflicting with Policy IM7.</p>	<p>The need for more certainty relating to the delivery of key items of infrastructure is acknowledged. As such, the phasing strategy of the SPD will be amended to ensure further clarity.</p> <p>Throughout the masterplanning process, the Council has commissioned an Infrastructure Delivery Cost Plan and numerous viability assessments, including a one-form entry primary school. This work attributes costs to the infrastructure necessary for development schemes within the Garden Communities to be funded by future house builder schemes in so far as it is viable to do so. The work also identifies project costs that are of wider benefit which cannot be attributed to a phase schemes.</p> <p>With regards to healthcare provision on site, see paragraph 6.2.8 in the Draft Woodhouse Garden Community Masterplan SPD</p>
	<p>6.16 (5.3.4) ‘demonstrate that consideration has been given to active travel routes’ is a weak statement that lacks substance. A travel plan must accompany each phase to demonstrate how each phase will contribute to active travel.</p>	<p>The Council considers this approach is consistent with Local Plan Policy IM5 – Ensuring Development Supports Sustainable Travel</p>
	<p>Education provision</p> <p>6.17 (5.4.1) The Forum is concerned that the primary school location/land size might be subject to more detailed feasibility</p>	<p>Calderdale Council retains a statutory duty to commission school places and ensure that there are sufficient school places in the right areas to meet the needs of the local population. The Council</p>

	<p>work. The proposal is already half the size stated during the Local Plan Examination (and IDP evidence). At this stage in the planning process, this provision should be finalised, and there must not be any further change to the location or education provision.</p>	<p>produces a 'Planning for School Places' document annually, highlighting projections for pupil place need in each area of Calderdale showing existing school places alongside the anticipated new demand for places.</p> <p>It is recognised that there is a balance to be achieved in the early phases between the critical mass of the local population creating demand for school places and the provision of local school places for new residents. Pupil projection modelling is an ongoing process and discussion has taken place between the Council's Education Team and the Garden Communities Project Team during the Local Plan examination process and throughout development of the SPDs.</p>
	<p>Green Infrastructure</p> <p>6.18 (5.5) Without the Open Space SPD, it is impossible to provide meaningful comment</p>	<p>The Open Space SPD will provide more detail on the implementation of Policy GN6 – Protection and Provision of Open Space, Sport and Recreation Facilities, specifically on the issue of on-site and off-site contributions. The draft SPD is currently being prepared, and it is not considered necessary that the draft is available to view, as it will not introduce new policy.</p>
	<p>Development Guidelines – Transport and Highway Infrastructure</p> <p>6.19 (5.7.12) The Forum objects to 5.7.12. Without certainty on the A641 CIP development, there is no meaningful mitigation for impact consequences because of the developments. Both strategic sites MUST contribute to the projects identified, and their contributions must be transparent.</p>	<p>The Infrastructure Delivery Plan is a live document, documenting the infrastructure schemes considered necessary to delivering Local Plan growth. The most recent IDP was presented to the Inspector during the Examination and will be updated again in due course.</p> <p>The Inspector acknowledged in her report on the Local Plan that the details of the A641 scheme are evolving, and that investigations to provide an alternative option to the Thornhills Spine Road were being undertaken, and Appendix 1 of the Local Plan is accordingly flexible in this regard:</p> <p><i>Unless demonstrated otherwise through an up-to-date Transport Assessment, no more than 680 units shall be delivered in advance of the completion of the critical schemes</i></p>

	6.20 Development of the IDP must be open to public consultation and scrutiny with any subsequent changes justified evidentially.	<p><i>listed in the IDP (2021). The IDP is a provisional list and is subject to change as masterplanning work progresses and the A641 business case is developed.</i></p> <p>The IDP is a list of infrastructure required to support the Plan. It is not a requirement of Government that Local Planning Authorities consult on IDPs.</p>
	<p>6.21 The Forum objects to the number of dwellings that may be delivered in advance of IDP interventions. As there is no up-to-date Transport Assessment to verify the justification for delivery of up to 680 dwellings, this number cannot be relied upon.</p> <p>6.22 The development guidelines fail to address the traffic impacts and the Council should not permit development on either site without a robust transport model and an up-to date Transport Assessment.</p>	Detailed capacity assessments will be required with each planning application. If there is a severe impact at any junction, then the development will be required to fund mitigating improvement.
	6.23 Because the CSTM is unreliable and inappropriate, transport and highway infrastructure provision is unusable and MUST be updated with an appropriate model subject to independent scrutiny.	The Local Plan Inspector found the transport modelling to be reliable.
	6.24 The Forum has successfully demonstrated to the satisfaction of the High Court that there are issues with the Council's assumptions in applying the CSTM and that these issues will be dealt with in the High Court in due course.	Comment noted.
	<p>Climate Change</p> <p>6.25 (5.9.3) The Future Homes Standard (FHS) and continued improvements to Building Regulations are insufficiently applied</p>	The Renewable and Low carbon chapter of the Local Plan provides the policy framework relating to developments supporting renewable and low carbon energy. These themes

	<p>in this SPD. It should be an automatic requirement that as the FHS and new Building Regulations are adopted nationally, these MUST be reflected in planning permissions on site.</p> <p>6.26 With long lead-in times on introducing new standards, developers must be required to incorporate all building regulations and standard changes (FHS) that come into force to any new dwelling that is incomplete at the point of introduction. There must not be a grace period for complying with updated standards.</p>	<p>are developed in more technical detail in this and other emerging SPDs, specifically the Renewable and Low Carbon SPD. These documents are set against a national picture where planning policy and guidance is expected to be strengthened through changes to the planning system. Initiatives such as the Future Homes Standard and the ongoing strengthening of the Building Regulations will, for example, require greater levels of energy efficiency and renewable and low carbon energy to be utilised in new developments over the construction period of the Garden Communities.</p>
	<p>Phasing and Delivery</p> <p>6.27 (6.1.1) The phasing plan is meaningless because it includes no timescales.</p> <div> <p>Recommendation: Add timescales to the phasing and delivery plan</p> </div>	<p>Refer to Paragraphs 6.1.3 to 6.1.6 of the Draft Woodhouse Garden Community Masterplan SPD</p> <p>The need for more certainty relating to the delivery of key items of infrastructure is acknowledged. As such, the phasing strategy of the SPD will be amended to ensure further clarity</p>
	<p>Infrastructure delivery</p> <p>6.28 (6.2.1) The delivery statement fails to acknowledge it is dependent on successfully delivering transport and infrastructure interventions. There is no recognition of how landowners will cooperate around equalisation or how the council can be confident in delivery.</p>	<p>The approach to landowner collaboration is set out in Section 6.5 of the Draft Woodhouse Garden Community Masterplan SPD and Section 6.3 sets out how the Roof Tax is intended to ensure that the costs of site-wide infrastructure are shared equitably across the Garden Community.</p>
	<p>Education</p> <p>6.29 (6.2.6) Secondary school provision is missing. Travel mitigation for not providing secondary provision is unclear.</p>	<p>Significant changes in preferencing patterns have occurred which has resulted in far fewer extra district pupils seeking provision within Calderdale. This has released capacity in the Lightcliffe area. Developments in neighbouring Kirklees have also been delayed. Additional capacity will only be provided if required and will be based upon need (not demand) at the time that developments are in the delivery stage.</p>
	<p>Healthcare</p>	<p>This is explained in paragraphs 6.2.8 and 6.2.9 of the Draft Woodhouse Garden Community Masterplan SPD</p>

	6.30 (6.2.8) The Forum objects to the lack of on-site healthcare provision, which was promised in the hearings, and it is a deep concern to the Forum that increasing existing (stretched) healthcare provision is now being relied upon.	
	Highways 6.31 (6.2.13) The suggestion that the 2021 Infrastructure Delivery Plan is a provisional list is of deep concern to the Forum, as the 2021 IDP was relied upon by the Council in their evidence to suggest the strategic sites were deliverable. All changes or updates to the Infrastructure Delivery Plan must be subject to public consultation.	The IDP is a live document, and projects are added and removed as projects progress or evidence shows specific projects are no longer required. This was recognised by the Inspector in her report. It is not a requirement of Government that Local Planning Authorities consult on IDPs.
	On-site highway provision 6.32 (6.2.17) This statement lacks detail on the engagement strategy 6.33 (6.2.18) The Forum is concerned that permitting approval to change infrastructure delivery should not be permitted unless a clear statement is made as part of a planning application and subject to public scrutiny before the planning consent is approved.	Any planning application will be subject to mandatory public consultation. Refer to Paragraph 6.2.18 of the Draft Woodhouse Garden Community Masterplan SPD which states that ‘any variation must be thoroughly justified...’.
	Developer contributions and funding strategy 6.34 (6.3.1) This consultation is disadvantaged because the ‘Roof-tax’ SPD is unavailable.	There is no Roof Tax SPD. The Masterplan SPD provides appropriate additional guidance on how the Garden Community will be delivered, including the approach to the use of developer contributions including the roof tax and other section 106 obligations (see Section 6.3 of the Draft Woodhouse Garden Community Masterplan SPD).
	6.35 (6.3.2) The Forum strongly objects to the omission of secondary school funding. The Forum considers it financially irresponsible and burdens the Council that landowners and developers (who will profit from development) do not share the costs of secondary school provision.	Significant changes in preferencing patterns have occurred which has resulted in far fewer extra district pupils seeking provision within Calderdale. This has released capacity in the Lightcliffe area. Developments in neighbouring Kirklees have also been delayed. Additional capacity will only be provided if

	<p>6.36 (6.3.2) The Forum is concerned that primary school provision charges are not explained in the same detail as presented in the Local Plan examination. An imbalanced split was proposed between the two strategic sites; what evidence is available to confirm this has changed?</p>	<p>required and will be based upon need (not demand) at the time that developments are in the delivery stage.</p> <p>The size of provision and the timing of delivery will be calculated based on latest pupil demographics and capacity in local schools, combined with the anticipated additional pupil yield anticipate from the new homes, at the time of commission. These are all variable.</p>
	<p>6.37 (6.3.3) As previously mentioned, the Roof-Tax SPD is missing at the time of this consultation, and so the financial impacts and consequences for the wider Brighouse area remain unclear. It is unacceptable that the Roof-Tax SPD is not available simultaneously.</p>	<p>As above.</p>
	<p>Stewardship strategy</p> <p>6.38 (7.1) This novel proposal has not been part of any previous proposal and has not been subject to public scrutiny at any point in the Local Plan Examination process. The Forum considers it unacceptable that the Stewardship proposal was not part of any earlier evidence. These Stewardship proposals have yet to be publicly subject to any viability assessment. Where a novel policy is now being introduced then this should directly relate to a specific policy in the Development Plan. Failure to do so means trying to bring a new policy in through the SPD process and this is flawed and wrong.</p> <p>6.39 (7.6.1) Estate management charges to be levied on all garden community residents have never been part of the public examination process. The inclusion of a change was not discussed in the examination nor justified in the viability assessment. Is this an admission that the viability assessment evidence was flawed or inaccurate?</p>	<p>The approach is set out in Local Plan Policy IM7 – Masterplanning Part VII.</p> <p>The community stewardship approach set out is tried and tested, with demonstrable benefits to residents and the housebuilders. It creates a sense of community and local ownership from the beginning, which is crucial to ensuring a successful new community at this scale.</p>
	<p>APPENDIX 1 – anticipated S106 requirements for each phase</p>	<p>The approach is set out in Local Plan Policy IM7 – Masterplanning Part VII</p>

	<p>6.40 (Stewardship) There is no explicit statement for a Stewardship charge in Local Plan policies IM7, HW4 and GN6. Where a novel policy is now being introduced then this should directly relate to a specific policy in the Development Plan. Failure to do so means trying to bring a new policy in through the SPD process, which is flawed and wrong.</p> <p>6.41 (Programme and Delivery) The build programme should be publicly available and presented as part of any planning application. For transparency, annual monitoring MUST declare conformity with the building programme.</p>	<p>Housing completions will be set out in the Authority Monitoring Report.</p>
	<p>APPENDIX 2 – validation requirements</p> <p>6.42 (Planning Statement) This paragraph is full of errors and needs re-writing</p> <p>6.43 (Landscape Visual Impact Assessment) – MUST be produced for every development adjacent to existing dwellings.</p> <p>6.44 (11.6.8) ‘Deliver fair benefits that deliver value for money while helping to integrate the site with the existing local community’ is ill-defined and open to misinterpretation.</p>	<p>As above, the wording of section 4.3.3 of the Draft Woodhouse Garden Community Masterplan SPD will be strengthened to ensure clarity.</p> <p>The Council consider this is not an unreasonable statement to make.</p>
<p>1340743</p> <p>Yorkshire Sport Steven Heywood</p>	<p>THMP35 & WOMP57, WODC30, THDC29</p> <p>Comments for Thornhills and Woodhouse Garden Communities design codes and masterplans</p> <p>Steven Heywood, Active Design/ Active Environments Manager (Landscape architect), Yorkshire Sport Foundation</p> <p>I commend all the detailing within the Calderdale garden communities design code and how it feeds into the Thornhill and Woodhouse masterplans. In particular the detail around Inclusive design, Biodiversity, Nature, Landscape design and</p>	<p>Comments on planning applications from colleagues in Public Services (on matters such as ecology and open space) will be based on up to date and relevant guidance at the time of the consultation of the planning application.</p>

	<p>management. In addition, the positive effects the implementation of the design code will directly have on the health and wellbeing of the communities within. I believe healthy nature = equals healthy communities.</p> <p>To support my comments and feedback the following documents and guides should be consulted upon to add further insight and detailing around the agendas: Safer Parks published by West Yorkshire Combined Authority, inclusive spatial design (in particular for woman and teenage girls) Make Space for Us research produced by Active Design at Yorkshire Sport Foundation, The active design principles and guidance laid out by Sport England, the Cities Alive; rethinking green Infrastructure guide from ARUP and Planting for our future The white Rose Forest action Plan (see links at the end of this document).</p>	
	<p>Please see additional comment below:</p> <ul style="list-style-type: none"> I commend the inclusion of community growing spaces enabling access to locally sourced food and active growing environment in the form of accessible allotments, growing spaces and community orchards. Thoughts should be given to also planting more edible hedgerows, street trees and edible woodlands. 	Local Plan Policy HW5 – Sustainable Local Food Production Part III applies to all new development.
	<ul style="list-style-type: none"> And the education communities in the use, management and ownership of the spaces to ensure maximum use, benefits and productivity. Including children and young people involvement as part of the curriculum 	Provision of community growing spaces provides opportunities for this, but links to school curriculum is beyond scope of SPD/planning.
	<ul style="list-style-type: none"> Maximum detail design should be given to the safety and accessibility to all of the green spaces, infrastructure and play spaces to enable health, wellbeing and fitness to all including amenities for woman and teenage girls (including good lighting) see guides included above. Particular care around safety 	Planning application would be required to comply with Local Plan Policy BT5 Designing Out Crime . A Crime Prevention Statement is also required to accompany the planning application.

	should be considered along the disused railway line green corridor.	
	<ul style="list-style-type: none"> However, lighting should also not interfere with the natural life cycles of wildlife including bats and other nocturnal animals 	Noted. Local Plan Policy GN3 – Natural Environment would apply to any planning application.
	<ul style="list-style-type: none"> Nature links and corridors should connect to garden spaces and public green spaces via closed canopy's, hedgerows and overhead and understory connectivity through the whole masterplan. 	<p>As set out in Paragraph 4.1.2 of the Draft Thornhills Garden Community Masterplan SPD, the masterplan is landscape led, seeking to retain and enhance the best aspects of the existing landscape and ecology through a network of open spaces with a variety of uses, creating a mosaic of habitats.</p> <p>In addition, Paragraph 5.5.1 refers to provision of a network of multi-functional green spaces.</p>
	<ul style="list-style-type: none"> Wildlife should be able to travel safely the length and breadth of the whole community. All efforts should be made to ensure infrastructure is designed to lessen the fatalities to wildlife from vehicles. In particular attention should be given to lesson the impact from vehicle son carnivore and raptor territories, hunting corridors and on migratory bird routes. The introduction of detailed wildlife bridges, tunnels, routeways and clear flight paths should be paramount in the biodiversity plan 	Local Plan Policies Policy GN2 – A Joined-Up Green Infrastructure Network and Policy GN3 – Natural Environment will apply to development proposals.
	<ul style="list-style-type: none"> Detailed thoughts should be given to enable the multi-use of SUDS and blue infrastructure elements not solely in the form of water storage and movement issues, wildlife habitats but also interactive space for play and physical activity. 	Refer to Local Plan Policy CC3 - Water Resource Management Part III(d) which states that SuDS should where possible, provide multifunctional benefits.
	<ul style="list-style-type: none"> All opportunities to ensure water stays within the network on site, within storage element's and for use in landscape management should be ensured 	Refer to Local Plan Policy CC3 - Water Resource Management

	<ul style="list-style-type: none"> Well-designed vegetive layers should endure naturally controlled microclimates so the community benefits from shade, wind breaks, filtered sunlight and the cooling and insulating effects of green infrastructure 	
	<ul style="list-style-type: none"> The playscapes should include access to nature and implements 'Learning through Landscapes' principles 	Several references to naturalistic play in the Design Codes.
	<ul style="list-style-type: none"> Great mixed variation of dwelling types, aesthetics and character properties. Fair mix of affordable opportunities is crucial to the building of a mixed community. 	Refer to the Masterplans which have detail on housing mix. Also Local Plan policies on Policy HS3 - Housing Mix and Policy HS6 - Affordable Housing will apply to any planning applications.
	<ul style="list-style-type: none"> Great addition of cycle storage at schools, public spaces and should also filter into the dwellings including retrofitting into those existing streets and neighbourhoods who do not have space adjacent to their homes 	Refer to 5.2.4 of Draft Thornhills Garden Community Masterplan SPD .
	<ul style="list-style-type: none"> Real though should be given to the Games Courts with regards to physical play and activities for all genders (see make space for Us research) an issue with MUGAS solely accommodating boys needs and not always the needs of other genders 	The detail of the exact activities on games areas is beyond the scope of the SPD.
	<ul style="list-style-type: none"> Planting communities should have a good mix of native but also thoughtful use of non-natives too that address climate change. New perennial and annual mixes should have pollen and food rich species. Many of the North American prairies perennials and annuals adapt well with our own species to create rich new model planting communities (see Pictorial meadows) It's important to build canopy resilience to both climate change and biological attack and so developing new street tree and woodland mixes will be paramount to the future proofing the landscape corridors, streetscape and green spaces 	Refer to 4.6.22 Draft Thornhills Garden Community Design Code SPD for information on Planting Strategy.

	<ul style="list-style-type: none"> The landscape should have a continuous seasonal and successional change 	
	<ul style="list-style-type: none"> A whole new approach to the management and maintenance of the landscape should be introduced and implemented with good horticultural practices and working with nature are at the forefront. So many of our landscape become misused and are maintained badly once handed over to contractors. 	See 11.3.2 in the Draft Thornhills Garden Community Masterplan SPD which states that all community assets including open space will be owned and managed by the Calderdale Garden Communities Trust.
	<ul style="list-style-type: none"> All trees should have maximum protection from petrol driven management tools and key infrastructure implemented to ensure maximum survival rates. See Planning for our Future White Rose Forest action Plan for more information on best design tree pits and street tree resilience and bio security resilience etc. 	Refer to Local Plan Policy BT3 – Landscaping
	<ul style="list-style-type: none"> Applaud the street hierarchy design and the implementation of the Amsterdam model as much as possible 	Noted
	<ul style="list-style-type: none"> It is crucial that traffic does not come anywhere near children on their cycle and active transport routes on journeys to schools and key destinations. Use of clever landscape buffers is fundamental to this 	Refer to the design principles underpinning the ethos set out in Section 2 in the Draft Thornhills Garden Communities Masterplan SPD
	<ul style="list-style-type: none"> Traffic parking typologies use good design principles but in terms of futureproofing there should be a long-term plan for removal of as much parking and car dependency as possible 	Noted
	<p>Overall, I applaud the detailing of the design codes and how they have been implemented into the masterplans.</p> <p>Steven Heywood</p> <p>Active design/ active environments manager, Yorkshire Sport Foundation</p>	Noted

	<p>Useful links:</p> <p>https://www.westyorks-ca.gov.uk/media/10739/230710_safer-parks_double-page-spread_web.pdf</p> <p>https://www.sportengland.org/news-and-inspiration/new-active-design-guidance-published</p> <p>https://www.arup.com/perspectives/cities-alive</p> <p>https://www.yorkshiresport.org/what-we-do/data-insight/make-space-for-us/</p> <p>https://whiteroseforest.org/about/actionplan/#:~:text=Action%20Plan%202021%2D25&text=Seven%20million%20trees%2C%20the%20equivalent,Government's%20Nature%20for%20Climate%20fund.</p>	
<p>1341770</p> <p>NHS Property Services Karen Montgomery e</p>	<p>THMP36 & WOMP58</p> <p>RE: Consultation on the Garden Communities Supplementary Planning Documents (SPDs)</p> <p>Thank you for the opportunity to comment on the Thornhills Garden Suburb SPD and the Woodhouse Garden Suburb SPD. The following comments are submitted by NHS Property Services (NHSPS)</p> <p>About NHS Property Services</p> <p>NHSPS manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable and modern healthcare environments. We partner with local NHS Commissioners, Integrated Care Boards (ICBs), and wider NHS organisations to help them plan and manage their estates to unlock greater value and ensure every patient can get the care they need in the right place and space for them. NHSPS is part of the NHS and is wholly owned by the Department of Health and Social Care (DHSC) – all surplus funds are reinvested directly into the</p>	

	<p>NHS to tackle the biggest estates challenges including space utilisation, quality, and access with the core objective to enable excellent patient care.</p> <p>Planning Policy on Infrastructure Funding and Delivery</p> <p>National policy (NPPF paragraphs 55 to 58) and guidance set an expectation for development proposals that impact on local infrastructure to mitigate their impact to be considered sustainable. There is a well-established connection between planning and health. Residential developments often have very significant impacts in terms of the need for additional healthcare provision for future residents, meaning that a planning obligation requiring that the development contributes to, or delivers, improved and/or new healthcare facilities is often necessary.</p> <p>Policy IM7 Masterplanning of the Calderdale Local Plan sets out that masterplans are expected to include appropriate community facilities and services to serve the new development, including health facilities. Policy IM10 Developer Contributions sets out that applications will be permitted where mechanisms are in place to ensure that the impact of development on infrastructure can be satisfactorily mitigated. In applying Policy IM10, the Council will have regard to the IDP and any adopted SPDs. Adopted Local Plan policies therefore support seeking and securing planning obligations towards healthcare infrastructure where this is required to mitigate the impact of new development on healthcare provision.</p> <p>Detailed Comments</p> <p>The delivery of new and improved healthcare infrastructure is significantly resource intensive. The NHS as a whole is facing significant constraints in terms of the funding needed to deliver healthcare services, and the level of projected population growth in the Garden Communities SPDs will add further pressure to the system. Paragraphs 6.2.8 and 6.2.9 of both</p>	<p>Joint working with the Clinical Commissioning Group (CCG) around the delivery of primary care health and wellbeing facilities has continued throughout the development of the Local Plan, including liaison with the Lower Valley Primary Care Network of GPs in Southeast Calderdale and the NHS Estates Delivery Unit. Discussion with the NHS Estates Delivery Unit confirmed that there would be no appetite for the provision of on-site health and wellbeing hubs that could accommodate surgeries, pharmacies and other associated facilities. Increased demand will instead be accommodated through the enlargement of existing facilities in the local area.</p> <p>The NHS/CCG have been consulted on iterations of the Infrastructure Delivery Plan, with no response indicating a need for additional provision resulting from Local Plan Growth.</p> <p>In addition, no evidence has been submitted to support the use of S106 Agreements demonstrating that this approach would meet the legal tests for use of S106 monies.</p>
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	<p>SPDs refer to healthcare infrastructure delivery and state that increased demand for healthcare will be accommodated through the enlargement of existing facilities in the local area. The acknowledgement that the additional housing growth proposed in the SPDs will impact on healthcare provision in the local areas(s) is supported.</p> <p>Sections 6.3 and 6.4 of both SPDs sets out the proposed approach to developer contributions and S106. Despite the acknowledgement that the proposed housing growth will have a direct impact on healthcare infrastructure, reference for the need for developer contributions towards primary care provision is not included in either the site wide infrastructure requirements table or the commentary on site specific infrastructure requirements. Given health infrastructure's strategic importance to growth and sustainable development, health infrastructure should be considered at the forefront of the council's planning policies for infrastructure provision.</p> <p>The NHS, Council and other partners must collaborate to plan the infrastructure and necessary funding requirements to support the projected population growth in the Garden Communities. A vital part of this is ensuring that the NHS has the resources required to develop additional healthcare infrastructure where necessary. We suggest that Sections 6.3 and 6.4 of the SPDs explicitly identify and provide assurances that the funding of the required expansion of primary care infrastructure through developer contributions will be provided, in order to ensure the Council meets the objectives of the Local Plan as a whole.</p> <p>Conclusion</p> <p>NHSPS respectfully request that the above comments are taken into consideration during finalisation of the SPDs. This will make sure that the SPDs effectively address the healthcare needs of the new residents of the garden communities. Please</p>	
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	do not hesitate to contact me if you have any questions about our response or wish to discuss these matters further.	
442984 WYJS David Hunter	<p>THMP37 & WOMP59</p> <p>Dear Sir,</p> <p>Apologies I have just found this consolation request in my junk email folder.</p> <p>The West Yorkshire Archaeology Advisory Service are generally in favour of the proposed Masterplan and Design Code Supplementary Planning Documents for the Thornhills and Woodhouse Garden Communities.</p> <p>We have previously commented on these sites which contain a number of designated and non-designated heritage assets. Our records include:</p> <p>Thornhills Garden Community:</p> <p>MWY2942 D-Shaped Enclosure possible: Iron Age and Roman</p> <p>MWY11840 Clifton Colliery Tramway: Later 19th century mineral railway</p> <p>MWY15304 Palstave (bronze tool): Bronze Age</p> <p>MWY6487 Woolrow Farmhouse; Listed Grade II 17th century</p> <p>Woodhouse Garden Community</p> <p>MWY1916 Possible Medieval Settlement and field systems near Firth House Farm : Area of small fields pre 1850</p> <p>MWY9967 Ha-ha associated with Woodhouse Hall: polite garden feature later 19th garden century:</p> <p>MWY10402 Firth House Farm Cottage and Barn and Field System: 18th and 19th farmstead</p> <p>MWY15236 Penannular Bracelet: Roman period</p>	Noted and agree to inclusion of listed assets in heritage section of relevant SPD.

	<p>Several sites located in Kirklees district but close to the Woodhouse Garden Community include evidence of a recently excavated Bronze Age burial site and later farm settlement off Bradley Road and two medieval monastic iron working sites in Bradley Woods (MWY2486 and 4562).</p> <p>The requirement for “Heritage Statement or Heritage Impact Assessment (as appropriate) and Archaeological Appraisal” in the validation requirements is reassuring.</p> <p>Other currently unknown medieval and prehistoric remains may be present and can only be discovered and assessed by archaeological evaluation. This would normally take place during the planning process and may prompt a recommendation to refuse, redesign or mitigate a given development. Mitigation may include design led measures to respect the historic landscape.</p> <p>Best regards David</p>	
<p>1341772</p> <p>Natural England Kate Wheeler</p>	<p>THMP38 & WOMP60</p> <p>The following information on green infrastructure will be useful to consider and use to help with the deliverability of the Supplementary Planning Documents.</p> <p>The new Green Infrastructure (GI) Framework will help local planning authorities and developers meet requirements in the National Planning Policy Framework to consider GI, the delivery of the local plan and associated new development. This framework can be used to deliver GI policy and we recommend the Supplementary Planning Documents refer to the 15 GI principles which set out the why, what and how-to do-good GI. The principles in conjunction with the Green Infrastructure Mapping Database - can be used to assist in planning GI strategically and inform policy.</p>	<p>It is considered that the benefits of green infrastructure are well established, and that the approach to Green Infrastructure in the Local Plan is consistent with the principles in the NE GI Framework It is not considered that they need to be repeated in the Design Code.</p> <p>The masterplan is landscape led, seeking to retain and enhance green infrastructure throughout the site. The principles, ethos and subsequent detail in the Masterplan and Design Codes reflect the 15 GI principles.</p>

	<p>Development should be based on the Green Infrastructure Principle What 4 - GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. The Supplementary Planning Documents should reflect the Green Infrastructure Principle Why 2 - Active and healthy places to achieve - green neighbourhoods, green / blue spaces and green routes that support active lifestyles, community cohesion and nature connections that benefit physical and mental health and wellbeing, and quality of life.</p> <p>GI also helps to mitigate health risks such as urban heat stress, noise pollution, flooding, and poor air quality. SuDS should reflect Green Infrastructure Principle Why 4 - GI reduces flood risk, improves water quality and natural filtration, helps maintain the natural water cycle and sustainable drainage at local and catchment scales, reducing pressures on the water environment and infrastructure, bringing amenity, biodiversity, economic and other benefits. SuDs should be integrated and linked to green infrastructure beyond the site boundaries.</p> <p>Please find attached the links to the information, which contain detailed information on how to plan and incorporate GI in the plan. It is important to ensure detailed guidance is available to developers for development proposed in the plan to be deliverable.</p> <ul style="list-style-type: none"> • Green Infrastructure Home (naturalengland.org.uk) <p>Green Infrastructure Home (naturalengland.org.uk)</p> <ul style="list-style-type: none"> • Green Infrastructure Map (naturalengland.org.uk) <p>Green Infrastructure Map (naturalengland.org.uk)</p>	<p>Natural England will be a consultee on phased planning applications, and proposals will need to demonstrate compliance with this policy direction.</p>
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	<ul style="list-style-type: none"> • The summary of the GI standards; Green Infrastructure Standards for England Summary (naturalengland.org.uk) <p>Please let me know if you would like any more information.</p> <p>Thank you.</p> <p>Kind regards</p>	
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THMPEnd