

Supplementary Planning Document:

Consultation statement

Introduction

This is the 'Consultation Statement' for the Thornhills Garden Community Design Code 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 20 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 Design Code SPD (Bookmark THDC)

Consultee	Comment	Council response and SPD amendment (where applicable)
1338499 Richard Todd	<p>THDC8</p> <p>Pg8 plan noted R6 not accessed via primary or secondary access but Jay House Lane. Jay House Lane between end cottage and a643 not suitable width.</p> <p>Pg14 1.2 site constraints - plan noted line passing Ox Close and end cottage indicated as foul sewer. Ox Close not served by main drainage.</p>	<p>The latest detailed site layout does not indicate access from Jay House Lane, in accordance with highway advice.</p> <p>The comments are noted and will be address by the applicant's drainage consultants. The proposed (and any remaining existing) foul drains are proposed to be captured by the new site foul drainage and connected to the public sewer system via gravity or pumps, as required</p>
1338499 Richard Todd	<p>THDC9 & THMP6</p> <p>Ox Close foul drains to septic tank what are the proposals to deal with non mains drained properties within red line boundary of Thornhill garden community</p>	<p>The comments are noted and will be address by the applicant's drainage consultants. The proposed (and any remaining existing) foul drains are proposed to be captured by the new site foul drainage and connected to the public sewer system via gravity or pumps, as required</p>
1338739 Yorkshire Housing (Mr Andy van Vliet)	<p>THDC11</p> <p>JTP and officers of Calderdale Council are to be commended on an excellent first draft of this residential design code.</p> <p>As we don't know the site, the comments below relate to general design guidance provided.</p>	<p>Noted</p>
	<p>General</p> <p>Please consider hyperlinking the contents page to relevant sections.</p> <p>It would be very helpful to have a summary 'requirements checklist' with just the specific dimensions required of certain</p>	<p>It is very difficult to summarise key requirements for each chapter or section, as different users will be interested in different aspects of the guidance. Where possible requirements are already grouped together as much as possible, e.g., paragraph 5.7.3 sets out specific dimensions for driveways as</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	elements, such as driveways etc. Failing that, then these specific requirements could be highlighted throughout the document in bold so that they are not missed. It's key for the user to quickly see what they need to do.	suggested. A more fundamental change would mean reworking the whole structure of the document.
	NATURE Consider emphasizing more strongly the need to work with what is already there regards habitat, topography, links to the countryside etc.	The 'Key Design Principles' within the Preface section set out that the masterplan has been informed by design principles and also the constraints and opportunities identified through site analysis.
	There are elements in other sections that could be signposted ie stewardship and biodiversity.	The stewardship chapter is already cross referenced in 4.3.14. The stewardship organisation is also referenced in 4.5.6. Biodiversity already forms part of the Nature chapter at section 4.6, so we are unclear how/where this should be otherwise signposted.
	You could introduce the concept of green infrastructure and the multi-functional benefits of environmental services such as suds and absorbing air pollution as well as its contribution to character, amenity, and habitat.	It is considered that the benefits of green infrastructure are well established, and additionally are set out in the Local Plan. It is not considered that they need to be repeated in the Design Code.
	4.3.6 why are these trees suggested? Birch and willow are small/ medium size and relatively short-lived.	These were included because they are native, wildlife-friendly species. However, this guidance is inconsistent with the level of detail provided for other open space types in this section, so suggest removing. Applicants will need to provide detailed landscape design strategies as part of planning submissions. Paragraph 4.3.6 will be removed.
	4.5 Key Open Spaces signpost 4.3.11 design principles. Key points to add here: the design needs to be justified as fit for a specified use, it should be accessible (ie legible, attractive and safe entry points, and appropriate movement infrastructure)	Refer to Paragraph 4.3.10 of the Draft Thornhills Garden Community Design Code SPD detail will be dealt with at planning application stage in consultation with colleagues in Public Services, taking into account the need for specific types of open space.

Consultee	Comment	Council response and SPD amendment (where applicable)
	and dwellings should not back onto open space, avoid left over spaces.	Refer to Section 8.3 Secured by Design Principles of the Design Code
	MOVEMENT 5.4 STREET HIERARCHY Suggest that street hierarchy should relate to level of enclosure, use and character, rather than just street width and highway configuration.	The street hierarchy does relate to use and character as well as width, alignment etc. For example, the higher traffic levels on the Primary Road required a segregated cycle lane and a wide verge.
	Private drives and shared surfaces appear to have been omitted as types.	The street types related to the higher order routes. Private drives and shared surfaces would still be acceptable.
	Have the Highway Authority endorsed the guide as specifying design to an adoptable standard?	Yes, they are of a standard suitable for adoption.
	5.5 TRAFFIC CALMING & JUNCTION DESIGN How are service vehicles to be catered for, but prevented from dominating the design?	A permeable network will reduce the number of turning heads. Calderdale also allow designs in residential streets where large vehicles encroach into opposing lanes, so that carriageway widths and radii are not excessive.
	Suggest adding guidance on turning heads and particularly accommodating the turning of the ubiquitous Amazon van.	That is addressed in national guidance. Servicing is addressed in the Draft Street Design Guide and the upcoming Street Design Guide.
	5.7 CAR PARKING Suggest adding guidance on 6m width vehicle track usually needed to enable a car to turn out of a drive.	That is addressed in national guidance. Servicing is addressed in the Draft Street Design Guide and the upcoming Street Design Guide.
	5.7.3 Add minimum driveway (without garage) 4.8m long?	That is addressed in national guidance. Servicing is addressed in the Draft Street Design Guide and the upcoming Street Design Guide.
	BUILT FORM	

Consultee	Comment	Council response and SPD amendment (where applicable)
	6.2.1. The design of urban blocks; Add reference to perimeter blocks/ internal courtyard design.	The Council considers the existing wording fulfils its purpose in this section.
	IDENTITY 7.3 FRONTAGE CHARACTER 7.3.11 should be signposted from SUDs design section	Agreed. Add bullet point after 5th bullet in 4.5.5 saying “Residential front gardens should include appropriate space for soft landscaping and permeable surfaces (refer to paragraph 7.3.11).”
	PUBLIC SPACE 8.1.11 General Principles Street lighting: add reference to avoiding conflicts with street trees and considering sensitive lighting to avoid conflict with bats.	This is a logical suggestion. Worth noting that section 4.6.16 on page 43 already includes the following text: “The design of ecologically sensitive lighting must support nocturnal species, particularly in any areas identified as potential bat corridors.” ACTION: Add additional general design principal bullets as follows: “Avoid conflict with the siting of street trees.” In addition, amend second sentence under 8.1.11 to “Proposals must reflect the character of the development and it’s setting by providing safe lighting levels in as visually unobtrusive a manner as possible and avoiding light pollution, particularly to support nocturnal species.”
	8.1.20 Street trees: add reference to adequate soil volume for the tree, avoiding negative impacts on dwellings (foundations, shading, dew drop etc) and the need for root barriers where close to the highway.	These are useful additional notes which can be added to the bullet points under 8.1.21. However, the issue of root barriers is already adequately dealt with under the 10th bullet. ACTION: Make the following additions to bullets under 8.1.21: Amend 10th bullet to say: “Tree pits should be designed to accommodate as large a species as possible with adequate soil volume for the tree.” Amend final bullet to say: “...in relation to the position of adjacent dwellings to avoid future issues with foundations, dew

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		drop, or reduced daylight or proximity of the crown necessitating significant surgery or removal.
	<p>8.2 INCLUSIVE DESIGN</p> <p>This isn't a particularly strong section, and arguably should be at the front of the document as part of the walkable neighbourhood definition. M4(2) dwellings should be promoted and they should be located on flatter parts of the site with access to bus and facilities. Housing for older people should be promoted. And a general principle of anybody being able to walk safely from their front door to any popular destination</p>	<p>This section concerns public spaces. Accessible/adaptable dwellings are covered in Paragraph 5.2.5 of the Draft Thornhills Garden Community Masterplan SPD. Meeting other housing needs is also covered in the Masterplan. The documents should be read as a whole.</p>
	<p>RESOURCES</p> <p>9.2.2 Private Amenity Space: seems a strange place for this topic.</p>	<p>The Council considers this is the appropriate place to discuss the ways in which private amenity space can support broader sustainability aims.</p>
	<p>APPENDIX: DESIGN COMPLIANCE CHECKLIST</p> <p>Did you consider using Building for Healthy Life? This would seem to better accord with national government thinking.</p>	<p>The Design Compliance Checklist is used to confirm that applicants have read and understood the specific guidance relating to the Thornhills site set out in this document. Building for a Healthy Life (BfHL) is a more general tool used to assess the quality of design against a set of key urban design and placemaking principles. Use of the Design Compliance Checklist does not preclude the complementary use of the BfHL as a useful way for designers to assess the overall quality of their proposals.</p>
<p>11510</p> <p>Jayne Taylor</p> <p>Younger Homes</p>	<p>THDC12</p> <p>Thornhills Garden Community, Design Code Supplementary Planning Document</p> <p>Consultation Draft 20.06.23</p> <p>(using the same annotation as the document)</p>	

Consultee	Comment	Council response and SPD amendment (where applicable)
On behalf of WG Ibberson		
	Page 1 - The Communities will include homes for all. (I cannot find any reference whatsoever to a retirement community within the Entire document)	The provision of specialist accommodation is referenced in a number of places in the Draft Thornhills Garden Community Masterplan SPD , for example refer to Paragraphs 5.2.3 and 6.2.5.
	Page 2 - Deliver a consistent and high-quality standard of design. (A highly commendable statement but surely it should be coupled with “economically available” for the vast majority of Calderdale residents).	Does high quality design auto result in higher purchase costs?
	Page 7 - Local centre and community centre located near to the main site entrance. (Where is the provision for a retirement centre?)	The provision of specialist accommodation is referenced in a number of places in the Draft Thornhills Garden Community Masterplan SPD , for example refer to Paragraphs 5.2.3 and 6.2.5.
	Page 13 1.2.1 A robust site analysis has been carried. (How has this been done or is it someone’s personal interpretation)	John Thompson Partners are a well established team of masterplanners, urban designers and placemakers and have used a tried and tested approach to the masterplanning of these allocations. The approach has been used on various other garden community allocations across the UK.
	Page 15, 1.3.1 - Built assets which should be incorporated into the site layout. (A golden opportunity to provide a Continuing Care Retirement Community has been missed. No mention of a specialist or any retirement facility within the entire document).	The provision of specialist accommodation is referenced in a number of places in the Draft Thornhills Garden Community Masterplan SPD , for example refer to Paragraphs 5.2.3 and 6.2.5.
	Page 17, 1.3.1 - A variety of locations were visited.	The map has been amended to show the locations visited.

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	(Which locations were visited to enable the reader of the Document to check the interpretation of the writer).	
	Page 21, 1.3.3 – A locally characterful vernacular (No provision for advancement in building materials or technology).	This section of the document sets out distinctive characteristics of the local vernacular to aid understanding. It is not saying that proposed buildings need to look like this or only use these materials. Para 7.1.4 on page 87 states “The architecture should be fresh and distinctive in style, avoiding a pastiche of past styles, but it should also reflect local character and materials so that new homes feel like they belong in Calderdale.”
	Page 25, 2.1.2 - Must conform to the framework set out. (Why no provision for advancement).	<p>Conformity with the framework set out by the Regulatory Plan is intended to ensure that all phases of the development follow the core vision and integrate effectively with their immediate and wider surroundings. It is noted on page 5 under “Code Breakers” that there may be circumstances where design solutions which are not in compliance with the code might be appropriate subject to suitable justification. Advancements in technology or manufacturing are specifically mentioned as one possible reason, so advancement per se is not precluded, but it must be fully justified and evidenced.</p> <p>SPDs build upon and provide more detailed advice or guidance on policies in the Local Plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. In instances where applicants depart from the content of the SPD, this will need to be fully justified and adequately evidenced.</p> <p>The Garden Community will be delivered over a long period of time, during which planning policies and guidance are likely to be updated. The guidance in this SPD has been designed</p>

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		specifically to be adaptable to future policy changes, and to remain relevant into the future. This SPD therefore should be read alongside the most up-to-date Local Plan (and associated guidance) and interpreted within that context to form part of a strategy which, to some extent, will evolve over time.
	Page 29, 3.1.2 - Deviation of +/-5m (What happens if the criteria changes, this is too rigid).	On reflection, we agree that this is overly restrictive for a site of this size/type. A deviation of +/- 15-20m would be more appropriate. However, this page is the only place where any deviation is mentioned (likewise on the corresponding page in the Design Code SPD and we feel that it would be better to remove the reference completely to avoid confusion. If we do include a reference to deviation anywhere it should be associated with the Regulatory Plan. Agree to remove paragraph 3.1.2 from both Draft Thornhills Garden Community Design Code SPD and Draft Woodhouse Garden Community Design Code SPD .
	Page 30, 3.2.1 - Indistinguishable from market housing. (What about cost – No allowance for a more economical solution).	Refer to Local Plan Policy HS6 - Affordable Housing Part VI. This policy was subject to viability testing.
	Page 30, 3.2.2 - Mobility hub (No provision for retirees).	Refer to 5.3.3 and 5.7.19 in the Draft Thornhills Garden Community Masterplan SPD
	Page 34 - Communal growing adjacent to Victoria Avenue. (Separated from existing housing by small stream – no vehicular access to the area).	Vehicular access will be provided via the new development parcel to the north.
	Page 47, 5.1.5 - All highways etc must be adopted. (Why).	This is the approach as advised by the Local Highway Authority.

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	Page 48 (Paths etc show going through existing gardens).	The Plan reflects the existing adopted Rights of Way, some of which do go through existing gardens and will be dealt with at planning application stage.
	Page 79, 6.1.2 - Minimum density – is set at 30dph (Why if a retirement village should be planned it may not achieve this density).	Planning applications will be assessed against Local Plan Policy HS2 - Residential Density , which set out a number of criteria which will be considered if lower densities are proposed.
	Page 91 (This area is ideally suited to being a retirement village within a buggy ride of Brighouse Town Centre).	Residential is identified as an appropriate use in this location and any planning applications would be determined in line with the SPD and Local Plan policies, specifically Policy HS4 - Housing for Independent Living Part II.
	Page 105 (The use of artificial stone for boundary walls must be considered due to cost)	Viability point noted. Artificial stone may be an acceptable alternative to natural stone if it is well-specified and detailed. Amendment to be made - “B2: Natural Stone Wall” to “B2: Stone Wall” and amending the first sentence of the associated description to say “Stone walls will be used to define front garden boundaries in key locations/along key frontages. The use of natural stone is preferred but artificial stone may be acceptable if it is of a high quality and well-detailed.”
	Page 111, 7.6.7 - Simple wet verge. (What about a dry fix system).	7.6.22 says that: “The detailing of eaves and verges must aim for simple, elegant solutions that do not visually dominate the elevation. Solutions which take inspiration from traditional, local precedents are strongly encouraged”. 7.6.7 notes that simple wet verge and minimal eaves details are typical on traditional buildings. While the use of a dry fix system is not precluded if it results in simple, elegant eaves and/or verge details which do not

Consultee	Comment	Council response and SPD amendment (where applicable)
		visually dominate the elevation, most dry fix verge systems on the market are very unlikely to be acceptable.
	Page 111, 7.6.7 - Limited use of boxed eaves. (This detail has been used in Brighouse/Calderdale extensively).	While boxed eaves may be used extensively in more recent developments, they are not a common component of the characteristic, traditional architecture of Brighouse or Calderdale. It is this distinctive identity which the guidance draws inspiration from and seeks to enhance. The use of boxed eaves is "generally discouraged", not precluded, subject to good design.
	Page 111, 7.6.7 - Stone dentil gutter brackets. (These do not lend themselves to the use of modern materials).	This point is noted. However, there is no requirement in the document to use them. Text under para 7.6.4 notes that building detailing should seek to reflect local character, but "...in a contemporary way which is compatible with modern building techniques and regulations."
	Page 112, 7.6.14 - Clad with lead, Zinc or Copper (Surely the use of a plastic-coated galvanised steel sheet could be used).	The use of natural finishes which will weather attractively over time is considered preferable to non-natural finishes such as plastic coating which may become damaged or fade over time and need replacing.
	Page 114, 7.6.24 - The use of rise and fall gutter brackets. (I am unaware of this type of bracket been used anywhere in Brighouse/Calderdale?)	The use of rise and fall gutter brackets was discussed by the housebuilders we consulted as part of the design code development process. Their use is encouraged, as it avoids the need for potentially unattractive fascia boards but is not compulsory.
	Page 131, 9.3.1 - Applicants must demonstrate that they have considered the use of Modern Methods of Construction. (It would appear that this has been added as an afterthought which does not fit with Earlier design considerations).	We do not believe that this requirement is inconsistent with earlier design considerations and is in line with national policy objectives which seek to deliver better quality homes more quickly and efficiently.

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>Summary/Conclusion</p> <p>I am of the opinion that the design code supplementary planning document DOES NOT meet the need of the local population going forward but favours identikit housing.</p> <p>Brighouse/Calderdale has a desperate need for retirement housing adjacent/near to the Brighouse Town Centre.</p> <p>We have a golden opportunity to meet this need with the Thornhill Garden Community.</p> <p>Hopefully the Planning Document will be amended to satisfy the needs.</p>	Noted. See above for responses on individual comments.
<p>1138084</p> <p>The Coal Authority – Melanie Lindsley</p>	<p>THDC13 & WOMP31WODC14, THMP12</p> <p>Dear Sir/Madam</p> <p>Thornhills Garden - Masterplan and Design Code Supplementary Planning Document Consultation</p> <p>Thank you for your notification received on the 25th August 2023 in respect of the above consultation.</p> <p>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 planning applications and development plans in order to protect the public and the environment in mining areas.</p>	
	<p>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</p>	

Consultee	Comment	Council response and SPD amendment (where applicable)
	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 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.	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)
	<p>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.</p>	Noted
	<p>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, 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>	Noted
817527	THDC14 & THMP14	

Consultee	Comment	Council response and SPD amendment (where applicable)
Nicola Denford	<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 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</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>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>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</p>	<p>Refer to Paragraph 6.2.9 of the Draft Thornhills Garden Community Masterplan SPD regarding provision of on-site healthcare.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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 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</p>	

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	<p>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>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 plan to live and work in Calderdale.</p>	

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	<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 pupils from these schools will go, after year 6, when both the local High Schools are fully subscribed?</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>Document-Specific Comments regarding the Thornhills Garden Suburbs</p> <p>Note: the wording in italics is taken from the actual documents.</p>	<p>The safety and capacity of the road network has been considered. A Road Safety Audit will be required with the</p>

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	<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>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 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>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>
	<p><i>“Provide attractive, ecologically rich buffer planting to existing dwellings within the site and around the boundary.”</i></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</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p><i>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>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 , specifically Policy BT1 – High Quality Inclusive Design of the Calderdale Local Plan, 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 Design Code SPD for additional detail.</p>
	<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>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 Building of the Local Plan and the demand expressed on the Self Build Register.</p>

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	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.	
	-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>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>
	-Additionally, it appears that site R14 and the Primary Route shown are planned on the Wildlife Habitat Network! This surely needs addressing.	<p>(See above)</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>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,</p>

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		ecological surveys and reports, including bat surveys will be a validation requirement on phased applications.
717694 Edward Spivey	<p>THDC16 & THMP21</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) to allow for flexibility to be able to respond to potential changes.</p>
	Design Code SPD document comments	Refer to 7.2.1 of the Draft Thornhills Garden Community Masterplan SPD

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	plan 4.2. "Amenity Green Space" is labelled, but then not defined. Its use, maintenance, and its accessibility to the public is not defined. Will this land remain in private hands? Will it be used for farming? Will public access to it be available? if so, how?	
	4.4 Play Strategy. No mention is made of provision for disabled children's use. Facilities for disabled access and usage must be incorporated into all play provision.	Refer to 4.4.2 which highlights the need for provision to suit all ages and abilities.
	para 5.12. "The majority of homes within 400m of a bus stop." This is not good enough - all homes should be within 400m of a bus stop - and if the Council was serious about its stated ambitions for Active Travel, then the vast majority of dwellings would be within 300m walking distance, front door to bust stop. This lack of ambition on the Council's behalf shows that they are happy to use the slogans, but not to enforce the necessary ,measure. This must be changed.	Approach consistent with Local Plan Policy IM5 – Ensuring Development Supports Sustainable Travel Part I.
	para 5.13. Why should cul-de-sac not be used?? They are very useful in allowing selected vehicle access. but by allowing pedestrians and cyclists etc. to pass beyond the end of the cul-de-sac allows additional permeability to non-motorised modes. This blanket ban on cul-de-sac is nonsense.	There is no blanket ban on cul de sacs. Approach is consistent with Local Plan Policy BT5 - Designing of Crime in creating a safe environment and reducing opportunities for crime.
	5.2 Access and Movement Plan. 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. 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	The plan indicates an existing private access. It does not indicate access to the wider site from Kiln Fold. Please refer to Draft Thornhills Garden Community Design Code SPD Section 5.4 Street Hierarchy, where Primary Street-

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	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.	Highway Features are detailed, including traffic calming measures.
	para 5.5 Public Transport. The use of a 400m radius to show proximity of dwellings to bus stops is deceitful. The distance should be 'front door to bus stop' and the Council should be going for a more ambitious 300m distance, not 400m.	Approach consistent with Local Plan Policy IM5 – Ensuring Development Supports Sustainable Travel Part I.
	para 5.33. Using the word "must" is good, but the rest of the paragraph is unenforceable. It should read "... so that all dwellings fall within a 300m walking distance from their front door to a bus stop."	Approach consistent with Local Plan Policy IM5 – Ensuring Development Supports Sustainable Travel Part I.
1341236 Sport England Stuart Morgans	THDC17 Calderdale Council Garden Communities Supplementary Planning Documents (SPD's)Public Consultation – September 2023 - Sport England Comments Thornhills Garden Community Design Code <p>Sport England wishes to make the following comments in relation to the proposed design code:</p> <ul style="list-style-type: none"> • Sport England welcomes the proposal to put in place a design code document to guide the development of the Thornhills Garden Community. • 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 Design Code proposals are reviewed against this guidance using our Active 	All phased planning applications will be assessed against adopted policies in the Local Plan, including Policy IM4 – Sustainable Travel and HW2 – Health Impact Assessments .

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	<p>Design checklist. Further information can be found here: https://www.sportengland.org/guidance-and-support/facilitiesand-planning/design-and-cost-guidance/active-design</p> <ul style="list-style-type: none"> • We support the specific reference to Inclusive Design in section 8.2, and in particular the reference in 8.2.1 that public spaces must be designed to be accessed used and enjoyed by everyone, including disabled, visually impaired, less mobile, parents with buggies and children. This aligns well with our core principle in Active Design 3. The reference note in 9.2.2 to our 2015 guidance should be updated to the new 2023 version above. • We support the references in 5.6 to providing a network of walking and cycling routes for leisure being encouraged. We would question whether the referencing to primary and secondary active travel routes ought to be suitably worded with the relevant phrasing as a design requirement (ie must) or at the very least good/best practice (ie. should) since neither seem to have been applied to paras 5.6.2-5.6.5 	<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> <p>Agree to amendment to refer to most recent Active Travel Guidance (2023).</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>1341241</p> <p>Environment Agency Aaron Miles</p>	<p>THMP19 & WOMP41, WODC17, THDC18</p> <p>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.</p> <p>We have reviewed the available information and we have the following comments to make.</p> <p>Flood Risk</p>	<p>Noted</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>Thornhills Garden Community Masterplan & Design Code:</p> <p>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.</p> <p>The A641 Greenway development class is non-major, and the vulnerability classification is essential infrastructure.</p> <p>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:</p> <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. <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>FRA included on the list included at Appendix 2 - Validation Requirements of the Draft Thornhills Garden Community Masterplan SPD</p> <p>The maps in Section 1.2 - Site Constraints and 1.3 Site Opportunities in the Draft Thornhills Garden Community Design Code SPD, illustrate the location of the Proposed A641 Greenway. It will be progressed through the planning process separately</p>

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	<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 Brighouse 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 Brighouse 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 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</p>	<p>Construction Phase Management Plan likely to be conditioned upon planning approval.</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>

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	<p>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>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>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>	<p>Comment noted</p>

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	<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 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>	

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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 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</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 of the Draft Thornhills Garden Community Masterplan SPD</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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-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</p>	<p>Planning applications will need to be consistent with Local Plan Policy CC3 - Water Resource Management³</p> <p>.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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.</p> <p>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>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.</p>	

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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.</p>	<p>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>
	<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. Sediment pollution control for the construction period will be factored into the Construction Environmental Management Plan (CEMP) produced for the site.</p>
	<p>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</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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	included where applicable (Section 6. Phasing and delivery of the Masterplans, Section 9.3 Design Construction of the Design Code Supplementary document).	
	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 .
	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.	Agreed. Proposed additional wording to 4.6.8: <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.
	Chapter 4. Nature section	Noted

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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>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> <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</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)
	<p>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>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 identified as potential bat <i>wildlife corridors, watercourses and new SuDS features</i>.</p>
	<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>	<p>The application will need to adhere to existing CMBC guidance on this, which includes provisions for swifts and other notable bird species.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>Page 44 - RESPONDING TO CLIMATE CHANGE AND BIOSECURITY</p> <p>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.</p>	<p>Agreed.</p> <p>Wording added to Paragraph 4.6.23:</p> <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.
	<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>	<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>
	<p>Thornhills Garden Community Masterplan</p> <p>Vision and Core Objectives</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>No mention of Water Framework Directive within policy context in masterplan document.</p>	<p>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 Directive is referred to Policy CC3 - Water Resource Management.</p>
	<p>Page 10</p> <p>GN3 — Natural Environment</p>	<p>Noted</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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>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>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>This is not included in the Draft Woodhouse Garden Community Design Code SPD, but in the Draft Thornhills Garden Community Design Code SPD. Response as above.</p>

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>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> <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</p>	<p>Noted.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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>	
	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>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>
	<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 identified as potential bat <i>wildlife corridors, watercourses and new SuDS features.</i></p>
	<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</p>	The application will need to adhere to existing CMBC guidance on this, which includes provisions for swifts and other notable bird species.

Consultee	Comment	Council response and SPD amendment (where applicable)
	woodcrete (a mixture of sawdust and concrete), these are far more robust than nest and bat boxes constructed of wood.	
	<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>	<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>
	<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> <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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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>1341266 Mr Oliver Bentley</p>	<p>THDC19</p> <p>As a local resident of clifton for a number of year I find this project totally imbalanced.</p> <p>Yes I agree calderdale needs more housing and it needs more accessible industrial space but how can it be fair to one community (Brighouse) that this area receives a massive portion of the proposed building sites.</p> <p>I appreciate that there are concerns over the industrial sites off of Wakefield Road but if they bring jobs to LOCAL people then I would find this a plus.</p> <p>However what I cannot agree with, as do the majority of residents of clifton, are the proposed sites on Thornhill Lane/ highmoor Lane.</p> <p>The infrastructure is just not there and will be massively overwhelmed. Be that the roads - at peak times there are already queues on highmoor Lane, couple that with ANY INCIDENT on the M62 and you can quadruple your travel time.</p> <p>Local doctors, schools, police service etc are all at capacity. I know there are plans for another primary school but what secondary school will all these new residents attend?</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 (SPDs), 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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>the area proposed for use is used by numerous people for its open space, for sports, cycling, dog walking and that's before you start on the amount of wildlife that lives in the area.</p> <p>I would guess some local people (probably few in number) will be the only ones to benefit from this enterprise - namely financially, and the council with the huge amounts of revenue generated.</p> <p>Local residents will not benefit in the slightest, if anything, house prices will lower along with a reduction in already stretched public services.</p>	
<p>1164799</p> <p>Mr Stephen Webster</p>	<p>THDC20</p> <p>The sites are too close to the M62 junction 25, Brighouse is already choked with traffic = more housing = more cars= more pollution.</p> <p>Thornhills site is green belt and should not be built on.</p> <p>Lack of infrastructure, A641 no funding plan to improve traffic congestion or access to the Thornhill s Site. This was promoted as being essential and achievable.</p> <p>Promoting cycling and walking is all well and good, however in reality it will be a minority of people that will choose or indeed are physically able to walk/cycle up and down to Brighouse town centre. Most people use cycling for recreation purposes not commuting to work. Brighouse like many areas of the UK are just too hilly.</p> <p>Wildlife will surely be wiped out by the sheer size of the proposed garden suburbs despite any mitigation measures.</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 (SPDs), 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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>I fail to see how biodiversity can be increased by building 2000 houses on the Thornhill s site.</p> <p>Thornhill s Hamlet should be protected with a buffer zone.</p> <p>Thornhill s Lane is a single track road already regularly used as a rat run. Jay House Lane is increasingly busier with traffic travelling at speed down onto Thornhill s Beck lane which is steep and narrow with blind bends. Thornhill s hamlet cannot cope with any more traffic therefore the self build sites are inappropriate and not necessary.</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>
<p>717690</p> <p>Mr Jason Carlton</p>	<p>THMP22 & THDC21</p> <p>General comments</p> <p>The timing of this Consultation (although consistent for Calderdale) disadvantages genuine public participation.</p> <p>Why didn't you hold any public engagement sessions before launching this consultation?</p> <p>The level of detail published in over 400 pages is impossible to digest in the limited time given</p> <p>Why haven't you engaged with local residents before this point? You have involved local landowners!</p> <p>What is the rush to hold this consultation when other SPD documents have not been made available at the same time?</p> <p>Considering countless errors, the documents would have benefitted from a professional proof-reader before their release</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, 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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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 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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	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 Paragraph 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. Discussion with the NHS Estates Delivery Unit confirmed that there would be no appetite for the provision of on-site health

Consultee	Comment	Council response and SPD amendment (where applicable)
		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
	<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>	<p>The approach is set out in Local Plan Policy IM7 – Masterplanning Part VII.</p>
<p>1341155</p> <p>Sam Booth</p>	<p>THMP23 & THDC22</p> <p>Calderdale Council Consultation Thornhills Garden Community Design Code SPD - 22nd September 2023</p> <p>Thornhills Garden Community Masterplan SPD</p> <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</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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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>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 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 	<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>Thornhills Garden Community Masterplan SPD intentions for early planning applications, enabling where possible, early planning applications to be made”</p> <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 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</p>	

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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 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</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 amended wording set out in the schedule of Main Modifications accompanying the Inspector’s Final Report (MM211).</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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>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>“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</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. 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>

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	<p>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>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>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</p>	

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	<p>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. 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</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>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>

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	<p>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>1123710</p> <p>Mike Ramsden</p>	<p>THDC23</p> <p>I am writing in connection with the latest proposals for the garden suburb site of Thornhills, although many of my comments could equally apply to the other proposed suburb of Woodhouse.</p>	

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	<p>As a very long standing resident of Thornhills Lane I was somewhat horrified to see that one of the latest design plans indicated that the siting of a school is directly behind existing residences, of which mine is one. When the idea of a school/schools was first put forward the selected site was much more centrally placed in the development, so it now appears that no account of the affect that this current proposed siting of the school would have on existing residents has been considered in the planning. Despite whatever control measures might be put in place, everyone who lives near a school knows that inconsiderate parents will park and abandon their cars wherever there is any space (whether or not there are any restrictions in force) and with total disregard for residents and the animosity such actions might create. I cannot really understand the current intentions, as the school sites illustrated on pages 11 and 19 of the garden suburb documentation differ in their positioning. Of the two, I strongly feel that the one shown on page 19 should be preferred as the road infrastructure would be much more capable of handling the additional traffic, particularly as Thornhills Lane was created long ago and not built for modern day traffic volumes.</p>	<p>The impact of school traffic has been considered including the locations where vehicles will drop off and collect pupils. The new roads closest to the school will be affected rather than Thornhills Lane which will be some distance from the school entrance.</p> <p>The Site Opportunities plan on page 16 clearly states that this is a 'Potential location' for the local centre and primary school. The Draft Thornhills Garden Community Masterplan SPD on page 25/26 shows the local centre in this location, while the school is slightly further to the west, but still in essentially the same area.</p> <p>Agree to amend shape of pale purple area to incorporate the primary school area as well.</p>
	<p>How is expansion of our town going to help an increased population. The town is already gridlocked for much of the day by traffic which is mostly just passing through and accidents on the local M62 very often further exacerbate the situation. Our Town Hall was sold. Furniture from there is stored in a back room at the current Civic Hall, which has been closed for some three years now, with a seeming reluctance on the Council's part to let us know what is happening with regards to the building's future. This has left our town without a public hall of any size in which a variety of functions could be held, despite</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 (SPDs), which establishes the broad principles to show how the Garden Community should be designed, translating the policy</p>

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	<p>the prospect of an increase in population if the Local Plan proceeds.</p> <p>Finally, how do these plans for Garden suburbs support the supposed premise, which is regularly reported, that Calderdale MBC wishes to preserve Green Belt land! The Thornhills area has been popular with walkers, runners, cyclists and horse riders for many generations. Try and convince the people of Brighouse by taking appropriate actions that this is indeed an aim and not a platitude.</p>	<p>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>
<p>1341717 ID Planning – Rachel Flounders</p>	<p>THDC24 & WOMP48, WODC23, THMP27, THDC24</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</p>	<p>Noted</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>site. The attached representations provide comments which will assist in ensuring the housing and associated infrastructure can be viably delivered.</p> <p>This representation statement provides comment on the consultation document based on the landowners and developers wide ranging experience of delivering housing developments.</p>	
	<p>This section of the representation statement provides detailed comments on the Draft Design Code SPD and highlights areas of concern based on wide developer experience of delivering houses in the area.</p>	<p>Noted.</p>
	<p>Page 6 – Local Policy Context (Typographical Error) Paragraph 4 of the Local Policy Context incorrectly refers to the Woodhouse Masterplan SPD. This should reference the Thornhills Masterplan SPD.</p>	<p>Noted – modification agreed.</p>
	<p>Section 1.4 Understanding Local Character</p> <p>The Design Code provides a detailed assessment of local built character, whilst this provides an important context some of the existing features cannot be readily replicated in modern housing developments, such as diminishing course which would be too expensive to deliver, passageways to the rear of properties which create floating freeholds and are advised against.</p> <p>In addition, windows with vertical proportions need to be carefully considered against Part O Building Regulation restrictions and building control implications in respect of</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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	protection from falling which are both costly and often unsightly.	
	<p>Section 2.1 Regulatory Plan</p> <p>The Movement Key sets out a pre-defined width for Primary Streets. This should not be pre-defined as it will be established through consultation with Highways and the Planning Officer.</p>	<p>Both the Design Code and Masterplan SPDs contain detailed information regarding key design principles and highway features.</p> <p>It is acknowledged that there will be further discussion as site layouts are advanced at application stage, based on these established parameters.</p>
	<p>Section 4.3 Key Open Spaces (Pocket Parks)</p> <p>The Design Code identifies indicative locations for pocket parks in the character area (Section 7) and they are shown to be a requirement in the Design Code checklist under the Key Open Spaces heading, but no further details are set out as to what these should comprise or how they fit into the wider Public Open Space provision.</p>	<p>The term 'Pocket Park' is synonymous with 'Incidental Green Spaces' which are described in paragraphs 4.3.10 and 4.3.11. The plan in section 4.2 Network of Spaces identifies 'Indicative Locations of Incidental Green Spaces', as does the Regulatory Plan, and these are the same as the 'Indicative Location of Pocket Park' shown in the Character Area Framework Plans.</p> <p>Agree to change 'Pocket Park' to 'Incidental Green Space' in the character areas section and the Design Compliance Checklist (and anywhere else it is found) to ensure that there is consistency across the document.</p>
	<p>Section 4.6 Biodiversity</p> <p>The text at paragraph 4.6.4 should be amended to acknowledge that BNG will be achieved across the site as whole as some individual parcels may deliver under 10% BNG and other parcels will deliver in excess of 10%.</p>	<p>On 9th October 2023 Cabinet considered the draft Biodiversity Net Gain SPD. Consultation ran from Monday 23rd October to Monday 20th November 2023. The approach to phased developments is included within the draft SPD.</p>
	<p>Section 5.3 Public Transport (Bus Stops Key Design Principles)</p>	<p>It is considered that 2m would be too narrow. It is difficult to see how the 3m can be considered a large expanse of tarmac. It is</p>

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	<p>Paragraph 5.3.5 sets out a requirement for a 3 metre bus stop waiting area. Some flexibility to this approach is required as 3 metres is a large expanse of tarmac when this may also coincide with a footpath at 2 metres in width.</p>	<p>a Garden Community and given the number/ spacing of stops, a metre reduction would make little difference. Not clear what the point about coinciding with a 2m footway relates to.</p> <p>With regards to the footpath, on the primary route, this is separated by the verge and cycleway.</p>
	<p>Section 5.4 Street Hierarchy (Secondary Streets)</p> <p>The Design Guide at paragraph 5.4.7 and the associated table states that <i>“on-street resident parking is encouraged, allowing for more compact housing typologies without on-plot parking”</i>. This is unrealistic and unviable. Most residents in this location whilst benefiting from the choice of active travel routes will still need access to a private car.</p> <p>The safest, most convenient and practical location for parking is to the front of the property on a private drive. The codes for this street type should be revised to provide for this. Without this amendment there is a very high probability of unplanned on-street and pavement parking.</p> <p>A national YouGov survey found that most people would prefer to be able to park their car near the front door on a driveway and 68% would prefer to park their car to the front of the home (2 cars side by side). 74% of respondents felt it was important to be able to see their car and 77% would prefer to charge their electric car on their driveway.</p> <p>The diagrams should be revised to show parking to the front of homes with landscaping between parking areas.</p>	<p>Avoiding the proliferation of long streets with vehicles parked on front driveways is essential if we are to avoid streets visually dominated by cars and create more compact forms of development with local character. Fundamentally the solution for parking should be a mix of different solutions in every area so that no one type dominates.</p> <p>The guidance states that on-street resident parking is encouraged rather than being required, so alternative solutions are allowed. However, para 5.7.1 also says that “On Primary and Secondary streets, cars parked on driveways should not sit forward of the ‘building line’ to prevent over-dominance of vehicles in the street scene”.</p> <p>The results of the survey are not surprising, and we understand why people say this. However, we strongly believe that places which are not dominated by cars are more attractive and popular, and there are lots of examples of new development which can attest to this.</p> <p>With good design on-street parking can also be convenient, practical, and visible from the dwelling, particularly where groups of spaces are provided perpendicular to the street, forming parking squares. However, we recognise that this is more challenging than simply giving every dwelling a 2-car driveway.</p>

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		<p>Highways Development Management concur that the Council cannot accept private drives as the only parking type. The Council could not have private on-street parking that is surrounded by highway; however, it would be acceptable as unallocated general parking – for example in areas where there is only one space per dwelling.</p>
	<p>Section 5.4 Street Hierarchy (Tertiary Streets – Urban)</p> <p>The Design Code states at paragraph 5.4.9 that <i>“Tertiary Urban Streets provide the opportunity to provide both visitor and resident parking on street, allowing for more compact housing typologies without on-plot parking.</i> This is unrealistic and unviable.</p> <p>Most residents in this location whilst benefiting from the choice of active travel routes will still need access to a private car. As set out in relation to the previous comment for secondary streets, the safest, most convenient, and practical location for parking is to the front of the property on a private drive. Our research has shown that the most convenient and desirable location for parking to a home is at the front of the home (2 spaces side-by-side). When ‘tandem’ parking is provided to the side of the home this often results in un-planned for parking on the street or pavement.</p> <p>With good landscaping convenient parking to the front of the homes can be incorporated so that streets are attractive and green. The codes for this street type should be revised to provide for this. Without amendment there is a very high probability of unplanned on-street and pavement parking. This text should therefore be deleted, and the diagrams should be</p>	<p>As above, this guidance is suggesting that the opportunity exists to provide on-street parking, not that this is compulsory. However, a more compact form of development with a tighter width between building frontages is fundamental to the creation of a distinct character for this street type.</p> <p>All the same comments apply as above, although we note that the 4th bullet of 5.7.1 says that parking spaces which sit forward of the building line may be acceptable on Tertiary Streets, although avoided where possible.</p> <p>Fundamentally this is about avoiding the creation of streets and spaces which are designed around the spatial needs of the car rather than those of people. We also have a mind to how these streets might look and feel in the future when our reliance on the private car may have reduced.</p> <p>The issue with front driveway parking is that it forces building frontages apart, creating overly wide streets and also that it leads to excessive areas of hard standing along the street with very limited amounts of landscape space which is bad for flood risk and biodiversity.</p> <p>We recognise the issues with tandem parking, but this is a well-used strategy in most developments. It also has the benefit of</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	revised to show parking to the front of homes with landscaping between parking areas.	reducing the width of hard standing on the frontage, allowing more space for landscaping. Tandem parking also has the benefit of reducing the width for driveways so fewer dropped kerbs.
	<p>Section 5.4 Street Hierarchy (Tertiary Streets - Mews)</p> <p>For Tertiary Streets (Mews), paragraph 5.4.10 and the associated table below specifies a variable carriageway width of 4.1m to 6m with no footways. Experience dictates that this is no longer appropriate especially when movement. As such we would suggest that this be increased accordingly.</p>	<p>Experience of the masterplanning team has not to date highlighted any particular issues with this arrangement, which is used elsewhere.</p> <p>The Council's Highways Development Management Team have had experience of layouts that have gone down to 4.1m. That is enough width to allow for access in one manoeuvre. The only time this is an issue is where layouts have short and narrow driveways.</p>
	<p>Section 5.5 Traffic Calming and Junction Design</p> <p>Paragraph 5.5.3 states that the maximum distance of straight carriageway or between any traffic calming feature is to be 60m. This is often not permitted due to fire appliance and waste management vehicle requirements.</p> <p>On page 64, the diagrams show a large number of bollards, which should be avoided, as a 'barrier' can be formed using landscaping or gentle land shaping.</p> <p>Paragraph 5.5.9 relates to the provision of raised tables where side streets meet the primary street. These are also often not permitted due to fire appliance and waste management vehicles requirements.</p>	<p>The 60m distance is based on national guidance and is applied by most highway authorities. The comment may be assuming that humps will be used. Calderdale do not favour these. We use ramps and cushions that are bus, ambulance and fire tender friendly as per DfT guidance (Local Transport Note 1/07 and TAL 1/98).</p> <p>The Council is open to innovative measures to restrict traffic so applicants will not necessarily have to use bollards.</p> <p>Raised tables and junctions are a common feature in most large new developments. The Highways Development Management have no experience of issues with fire appliances at raised areas, whereas obstruction by parking is a regular concern.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>Section 5.7 Car Parking (General Principles)</p> <p>Paragraph 5.7.1 (Car Parking General Principles) states “<i>On Primary and Secondary Streets, cars parked on driveways should not site forward of the ‘building line’ to prevent over-dominance of vehicles in the street scene. On Tertiary and Edge Streets this should still be generally avoided where possible</i>”. This is unrealistic and unviable as there are likely to be instances where this is unavoidable. Setting out a requirement to break up the frontage parking could result in fewer dwellings being delivered as smaller dwellings will then need to be spaced further apart.</p> <p>As previously highlighted, most residents in this location whilst benefiting from the choice of active travel routes will still need access to a private car. The safest, most convenient and practical location for parking is to the front of the property on a private drive. When ‘tandem’ parking is provided to the side of the home this often results in un-planned for parking on the street or pavement.</p> <p>The YouGov evidence highlights that 68% of people would prefer to park their car to the front of their home (2 cars side by side) and only 24% would prefer to park to the side of the home (one car in front of another). Only 2-3% would prefer to park in a parking court or other remote parking. 74% of people said that it is important for them to be able to see their parked car from their home and 77% would prefer to charge their electric car on their driveway.</p> <p>It is important that new places are designed to meet the needs and aspirations of the community who will live there, this is the</p>	<p>The above comments also apply here.</p> <p>The masterplanning team have had numerous discussions with the housebuilders regarding this issue.</p> <p>The documents seek to avoid the creation of excessively wide streets with unrelenting driveway parking along their length. The aim is to create a new community based on the principles of Active Travel rather than a car-centric design which will look like any number of other housing estates.</p> <p>These are principles commonly written into design codes and subsequently designed into detailed layouts.</p> <p>Building for a Healthy Life identifies the following as best practice:</p> <ul style="list-style-type: none"> • Shared and unallocated on-street car parking • A range of parking solutions. <p>And the following as poor practice:</p> <ul style="list-style-type: none"> • Over reliance on integral garages with frontage driveways • Frontage car parking with little or no softening landscaping • Views along streets that are dominated by parked cars, driveways or garages. <p>On the one hand it is hard to argue with the survey evidence, and it is easy to understand the results. However, it is disingenuous to suggest that because of this, the design code will create a place which is not designed to meet the needs and aspirations of the community who will live there. Who is to say that the people who move there will not be doing so because it</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>goal of good design. A failure to do this represents poor design.</p> <p>With good landscaping, parking to the front of the homes can be incorporated so that streets are attractive and green. The codes for this street type should be revised to provide for this. Without amendment there is a very high probability of unplanned on-street and pavement parking. This text should therefore be deleted and the diagrams should be revised to show parking to the front of homes with landscaping between parking areas.</p> <p>The 7th (final) bullet point at paragraph 5.7.1 also requires that on-plot parking spaces should provide adequate room for access around the car (including bikes). Additional text should be added to state <i>“unless access is provided elsewhere”</i>.</p> <p>Paragraph 5.7.3 (3rd bullet point) states that driveways should be of a length that accommodates either 1 or 2 cars. Intermediate lengths can result in vehicles overhanging the footway or manoeuvring areas. This should include the words “where possible” or be removed altogether. It is unreasonable to expect all parking solutions to be exact lengths of the average car as this can restrict the position of garages and either reduce parking overall or prevent access to the rear of plots. This point does not also consider that some properties may have vehicles larger or smaller than the average size and so this issue can still occur.</p> <p>Consideration should be made in the design but this is not something that can be avoided entirely and the appropriate use of these areas is down to the occupiers. This point is also</p>	<p>is unlike the estates found elsewhere. Will they all have two cars? Will they be happy to park their car slightly further away from their home because they know that they have easy access to active travel routes and the streets they live in are attractive and greener places.</p> <p>The Council accepts that access for a bike might be provided elsewhere, but there is still a need for there to be adequate room for access around the car, particularly as cars continue to get larger. Some driveways are so narrow that people are forced to get out of their car onto grass/shrubs or sometimes cannot get out of the car at all because of proximity to walls or boundary treatments. It is agreed however, that additional space should not be creating needless additional hard-standing, so designing driveways and footpaths in a way which optimises access arrangements is key.</p> <p>Highways Development Management (HDM) do not see why you would want to have driveways that were not in car length multiples, possibly it makes life harder because of the standard house types/garages. Although, it is not agreed that it cannot be designed out or with landscaping. Therefore, HDM do not want it removed for 1.5 lengths. However, if a driveway is greater than 2 lengths HDM would not object, so the guidance can reflect that.</p> <p>For new dwellings the most straightforward means of accommodating cycle storage is a garage with enough space to occupy a car plus at least 2 cycles.</p> <p>The Council agrees to additional wording to state that “unless secure internal cycle storage is provided elsewhere”.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>contradicted on the following page (Page 69) which shows drive lengths of intermediate length with the assumption that occupiers will not park forward of the build line, but this will not be something that can be policed, and again it would be down to occupiers to use these areas appropriately.</p>	
	<p>Section 5.7 – Car Parking (P3 Integral Garage with On Plot Parking Between Dwellings)</p> <p>Car Parking Typology P3 sets out the following requirements: - <i>The use of house types with integral garages (Integs) is generally discouraged for the following reasons:</i></p> <ul style="list-style-type: none"> • <i>They are not a traditional housing typology and therefore are generally at odds with the built character of the area.</i> • <i>Unless the dwelling is wide, front elevations tend to be dominated by garage doors creating poorly proportioned building frontages.</i> • <i>Because of the need to provide a driveway/parking space in front of the garage, front gardens become overly deep and are dominated by hard paving, leaving little room for landscape treatments.</i> <p>Integral garage houses are a popular house type and should be allowed. As set out previously in relation to other car parking comments, parking to the front of the home is the most desirable. The YouGov survey highlights that 95% would find a garage and driveway useful. Tandem parking results in one car being parked on the street or pavement.</p> <p>Integral garage house types allow for the provision of deep, well planted front gardens, with 93% of people would prefer their home to be set back from the street behind a front garden.</p>	<p>The masterplanning team have had several discussions with the house builders during the development of the process explaining why we do not think that houses with integral garages are a good or appropriate design solution in most cases, as set out.</p> <p>Very few people use their integral garage as a parking space, resulting in the need for 2 spaces on the driveway. For all the reasons previously set out we do not think that 2 side-by-side spaces is an acceptable solution, hence the suggested typologies.</p> <p>Deep, well-planted front gardens may be appropriate in some locations, but not all, and as above, the size of the garden is compromised if a two-car driveway is provided.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>The SPD should not therefore discourage the use of house types with integral garages.</p> <p>The P3 layout diagram is inefficient and impractical in its plotting style. Separate drives to the sides of integral garages should be avoided.</p> <p>The P3 typology also states that <i>“No more than 4 detached Integs will be allowed in a row (an exception may be made for terraced dwellings forming part of a distinct mews street character)”</i> and <i>“Rows of Integs should be bookended by other dwellings types with shallower front garden depths to screen the driveways of the Integs, and Integs must not be located on the ends or corners of streets”</i>.</p> <p>This is unjustified and would result in unusual changes in the building line as well as inefficient plotting of homes. As set out previously, detached integral garage house types deliver attractive desirable homes and streets with deep front garden. These are an important typology in the delivery of attractive, landscape-led streets and homes that people want to live in. The restriction of this type of home will adversely affect the quality of the development and the quality of life of residents. This requirement should be removed. A variety in integral typologies can provide an attractive streetscene with good landscaping opportunities and good architectural character with longer runs.</p> <p>The P3 typology also states that <i>“Adjacent integs should be handed, where site constraints allow, to maximise the width of landscape areas between driveways and create defined groupings”</i>. This would not achieve any net increase in</p>	<p>As previously stated, this aims to avoid continuous street frontages comprised of the same or very similar integrated house types with frontage parking which will visually dominate the street. This arrangement is often seen in typical estate design and is at odds with the aspirations for the creation of a distinctive and characterful new community.</p> <p>To claim that this particular requirement will adversely affect the quality of life of residents is simply untrue.</p> <p>While this may not create more green space overall, it means that the bits there are there will be more meaningful in terms of habitat and biodiversity creation. It also helps to create a greater sense of rhythm to the streetscape.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>landscape areas and instead would result in groupings of garages and driveways. It is much better for streetscape to intersperse driveways and gardens to provide optimal screening of parked cars as well as privacy and quality of life benefits for residents.</p> <p>It is also stated that, <i>“Where two on-plot parking spaces are required, if one is provided in front of the garage door/building line, the other space must be provided to the side of the dwelling, to avoid the entire width of the house frontage being hard paved. Generous landscape areas must be provided within front gardens to obscure parking - see P3b”</i>. By far the most practical, convenient, and desirable arrangement for car parking is two spaces side by side. This allows for safe and convenient access between the car and easy electric car charging. By putting a single car parking space to the side of the home where it is not visible from the home it is more likely that this car would be parked on the street. This is also an inefficient way of plotting homes.</p> <p>The P3 typology also states that <i>“The garage door (B) must not exceed half the width of the remaining facade (A) (an exception may be made for terraced dwellings forming part of a distinct mews street character)”</i>. This is unjustified and an arbitrary requirement and should therefore be deleted.</p>	<p>See above comments.</p> <p>This is intended to avoid the provision of houses where the façade is completely dominated by a large double door garage. The particular requirement set out may be a little too restrictive, however and the Council agrees to amended wording.</p>
	<p>Section 5.8 Cycle Parking</p> <p>The Design Code at Section 5.8 specifies this should be 1 space per bedroom (LTN 1/20). If parking is within a garage, it is stated that sufficient space must be provided to ensure a car may also be parked. Section 5.7 (Car Parking) states that to count as a parking space, a single garage must have minimum internal dimensions of 6m x 3m, with a minimum opening width</p>	<p>The Highways Development Management Team have been applying those garage dimensions since 2017 and they are applied in most local authorities. Residents expect to be able to park and exit a vehicle where it is labelled on plans as a garage.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	of 2.4m. This will allow a family-size car to enter the garage and for the driver to exit the vehicle comfortably. This requirement will have implications for garage sizing and could also impact on site densities.	The impact on density will be minimal as most deficient layouts only require an additional 0.3 -0.4m in length or depth. HDM have no experience of housebuilders objecting to extending garages.
	<p>Section 6.2 – Built Form Principles</p> <p>Paragraph 6.2.9 (Gaps between buildings) states there must be a gap between buildings of 3 metres. This is excessive as building and maintenance buffers can be assured with spaces from 1.3 metres. Paragraph 6.2.12 (Turning Corners) states that layouts which result in two or more exposed garden boundaries in a row must be avoided. This is unduly restrictive as there will be instances where this approach is required to deliver the densities required.</p>	<p>The figure of 3m has been influenced by side to boundary privacy and separation distance guidelines as detailed in table 2.1 of Annex 2 - Space About Dwellings of the Local Plan. While this guidance relates to site boundaries, the Council consider that 1.3 metres is excessively tight, and a 3-metre gap would allow high quality design and layouts.</p> <p>The Council consider that this should not be the case in a well-designed layout. However, we would note that the wording under 6.2.12 states that “In general, there must be...” and this will be changed to “In general, there should be...”. The Council would also suggest changing the ‘must’ in the 2 diagrams at the bottom of the page to ‘should’ also.</p>
	<p>Section 7.2 Thornhills Lanes Character Area</p> <p>The Framework Plan for the Thornhills Lane Character Area at Point 3 requires that existing mature hedge and trees are to be retained and enhanced along Highmoor Lane and Jay House Lane, with additional planting forming a buffer from adjacent homes. This has an impact on the density of development in this parcel. Flexibility within the wording should be provided for the hedges and trees to be retained and enhanced where possible. This approach will allow the developer of the parcel to assess the quality of the existing landscape features and the impact on the layout of this character area.</p>	It is considered the existing wording is necessary and aligns with policy guidance in the Local Plan, with particular regard to design, natural environment and landscaping policies.
	Section 7.4 Boundary Types	

Consultee	Comment	Council response and SPD amendment (where applicable)
	Hedging and planting should be identified as a suitable boundary treatment. This reduces the unnecessary physical boundaries where planting can be optimised, particularly between front gardens and footpaths.	Hedges are identified as an appropriate form of front boundary treatment within the table in the Boundary Types chapter.
	<p>Paragraph 9.1 Energy Strategy</p> <p>Paragraph 4.1.9 sets out requirements for building orientation to maximise the potential for passive energy gains, this includes optimising orientation of buildings, optimising the area of glazing on elevations facing south, south east and south west and minimising the glazed area on other elevations. Floorplans are also to be designed so that the principal living spaces benefit from access to the sun with secondary spaces on the less sunny side/s of the building. This requirement is unduly prescriptive and whilst developers will seek to maximise passive energy gains where possible, there would be cost implications in making significant changes to a housebuilders range of house types to meet this requirement.</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>This guidance aligns with the Council's aspirations for the creation of a distinctive and high-quality new community.</p>
<p>1246329</p> <p>Historic England James Langer</p>	<p>THMP29 & 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>	Noted

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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>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 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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>19 Paragraph 3.2.2, 3rd bullet point</p> <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>	Noted
	<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 small 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</p>	Noted

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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. 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>	
	<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</p>	<p>Noted</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	under the list of anticipated S106 requirements in line with the site specific criteria of Local Plan site allocation LP1563.	
	<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 (as appropriate) and Archaeological Appraisal in support of any forthcoming planning application.</p>	Noted
	<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

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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 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.</p>	Agree with suggested amendment.
	<p>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.</p>	Agree to remove indicated zone.
	<p>15 Paragraph 1.3.2, 3rd bullet point</p> <p>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.</p>	Noted
	<p>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.</p>	Noted
	<p>139 Appendix – Design Compliance Checklist It is disappointing to see that there are no specific compliance</p>	The Design Compliance Checklist is specifically linked to the chapters of the Design Code. See response above regarding

Consultee	Comment	Council response and SPD amendment (where applicable)
	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 integration of heritage considerations throughout the Design Code.
1246930 Woodhouse Residents Association	<p>WOMP53 & WODC27, THMP30, THDC26</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</p>	

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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 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>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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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 present barriers to participation or disadvantage any protected groups from participation.</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. • 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.

Consultee	Comment	Council response and SPD amendment (where applicable)
		<ul style="list-style-type: none"> • 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, 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>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>
	<p>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>	<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 IM7 – Masterplanning was subject to the Local Plan Sustainability Appraisal that incorporated the relevant requirements of the SEA Directive and both Garden</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
		Community Site Allocations were also subject to the same assessment there is no further requirement to carry out SEA against these SPDs.
	<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 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,</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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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>	
	<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</p>	<p>Noted. Various modifications have been proposed and will be carried forward to the final versions of the documents.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	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.	
	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 .	Please refer to the “How the SPD will be used” section commencing at paragraph 1.1.2 in the Draft Thornhills Garden Community Masterplan SPD .
	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 mitigations required within the Infrastructure Delivery Plan (IDP) and is still not even approved or committed, with no dates for delivery.	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.
	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	The Masterplan and Design Codes will ensure that the wider site is delivered in a comprehensive manner. Pre-application

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	<p>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>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 • 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. 	<p>Noted – see the relevant responses in the detailed comments section below.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<ul style="list-style-type: none"> • 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>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 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</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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	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>

Consultee	Comment	Council response and SPD amendment (where applicable)
		Note: Update in all 4 documents.
	<ul style="list-style-type: none"> • mention is given to protecting and enhancing the natural environment but this must also include the significant historical and visual/scenic quality of the landscape character and protection of Public rights of Way (PROW) • 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>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 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. 	<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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<ul style="list-style-type: none"> Working with the topography does not seem to have been thought through in terms of accessibility when aligned with active travel. 	
	<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> <p>Note: Update in all 4 documents.</p>
	<ul style="list-style-type: none"> Define day to day facilities? Who has decided on what these are and what is required? 	<p>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>
	<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>	<p>See above responses.</p>
	<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</p>	<p>Noted – amendment agreed.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	section should talk about the context of the Woodhouse Garden Community.	
	<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 prepared/adopted yet so it cannot show how it adheres to its principles.</p>	Once adopted, the SPDs will become material planning considerations against which any forthcoming applications will be assessed against.
	<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>	Applications will be determined against the adopted Local Plan and any other material considerations relevant at the time of submission.
	<p>Text to be changed to MUST from 'should' as follows:-</p> <p>"Once adopted, these documents will become material considerations in the determination of planning applications</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

Consultee	Comment	Council response and SPD amendment (where applicable)
	and will explain in detail how specific policies in the Local Plan MUST be implemented.”	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>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>	Reference to the masterplan in this context refers to the masterplanning process as a whole and specifically the key design principles that underpin the wider approach. The Regulatory Plan is the platform upon which all detail within the design code is based.
	<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>	Please see chapter 2, section 2.1 – Regulatory Plan. Issue dependent on viewing options on individual computer programmes.
	<p>– effective and transparent community involvement. NPPF 2021 states at para. 127.</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 LP1463 – Land between Highmoor Lane and Bradford Road, Brighouse,</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
		<p>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>– “Measures to mitigate the traffic impacts of the proposed development on the strategic and local road networks” (IM7 VIi) 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>See responses where more detail is provided in comments to Masterplan SPD.</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</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>

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	Corridor Improvement scheme such as 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>- 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 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>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 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>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>
	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)	Noted
	Secondary school provision and infrastructure has not been addressed in accordance with the Infrastructure Delivery Plan (IDP) which sets out the necessary infrastructure. The	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

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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>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 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</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 Heritage Statement or Heritage Impact Assessment (as appropriate) and Archaeological Appraisal.</p>

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	<p>(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>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>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>Agree to modification to include additional assets in list as advised by WYJS.</p>
	<p>In accordance with NPPF 2021 the following constraints should also be added</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 –</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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 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,</p>	<p>Green Infrastructure and Natural Environment, specifically Policy GN5 – Trees.</p> <p>As stated in Appendix 2 – Validation Requirements of the Draft Thornhills Garden Community Masterplan SPD, a Tree Survey will be required on submission of phased planning applications as well as Ecological Surveys and Reports.</p>

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	<p>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> <ul style="list-style-type: none"> • 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. 	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.
	<ul style="list-style-type: none"> • 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. 	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.
	<ul style="list-style-type: none"> • 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 	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

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	<p>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> <p>• fragmentation of land must be prevented to facilitate the movement of wildlife between Calderdale, Kirklees and the wider area.</p>	<p>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> <p>• 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</p> <p>• Change to 'MUST' - Designated and non-designated heritage assets, including historic field boundaries MUST influence the layout and character of development parcels</p> <p>• Add - New streets MUST be tree lined to assist carbon reduction and complement existing character</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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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>	Agreed. Wildlife Habitat Networks in both Calderdale and Kirklees will be fully considered in a joined-up approach.
	<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. 	The Coal Authority have been consulted and have responded to the SPD consultation. Their comments and the Council’s responses can be found within this Consultation Statement.

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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 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>	
	<ul style="list-style-type: none"> 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><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>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</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p><i>[Landfill site locations]</i></p>	<p>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 Draft Thornhills Garden Community Design Code SPD).</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>
	<ul style="list-style-type: none"> • 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><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</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 Thornhills 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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	a constraint on the Woodhouse Garden Community proposals and open space.	
	<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 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>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>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</i></p>	<p>The West Yorkshire Joint Services have been consulted as part of this consultation. Their comments and the relevant responses can be found within this document. The Council agrees to the inclusion of various assets listed in the WYJS comments.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<i>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>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> <ul style="list-style-type: none"> • We repeat non-designated heritage assets at Upper Woodhouse are not shown and should be referenced/considered 	<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>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>
	<ul style="list-style-type: none"> • 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. 	<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.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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>Vehicular access will be maintained with any future changes to the road network.</p>
	<p>• 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 application identify the ground water flooding risk to this area as shown below.</p> <p>Flooding needs to be identified as a constraint on development</p>	<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>• 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 Thornhills Garden Community Masterplan SPD confirms that a drainage strategy will be submitted with phased applications (Surface Water and Foul Drainage Assessments)</p>
	<p>• 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</p>	<p>The subject of lighting is considered in the draft Draft Thornhills Garden Community Design Code SPD at section 4.6.16. Lighting will also be considered at the planning application stage</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	Protection Groups for local records to ensure adequate protection.	
	<p>• In accordance with the WYAAS Landscape Character Assessment 2017:-</p> <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</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 Thornhills 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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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>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>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 previously – 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</p>	<p>Noted.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	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>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>	<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 Draft Thornhills 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>
	- colour of parks/ gardens and green links cannot be differentiated	Agree to amend colours to create greater clarity between the different categories of greenspace.
	- 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?	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.
	- 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?	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.

Consultee	Comment	Council response and SPD amendment (where applicable)
	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?	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.
	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>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>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>
	- 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	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

Consultee	Comment	Council response and SPD amendment (where applicable)
	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.	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. 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.
	- It mentions PROW but it is difficult to see where these are on the plan	Noted and responded to above.
	Page 30 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.
	Have the cricket club been consulted on the new pavilion proposals and its location? 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.	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.
	Page 33 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.	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. Advice contained within the SPDs and the Local Plan policy framework will ensure that the public realm is considered as a unified whole.

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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>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.</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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	Failure to do so will place undue costs on the latter phases of the site and risk delivery.	
	<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 Thornhills 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</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
		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.
	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>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>
	Veteran/notable trees must be retained and protected with adequate buffers – 15m.	See above response on veteran and notable tree assessment.
	<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>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>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.</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>

Consultee	Comment	Council response and SPD amendment (where applicable)
		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>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>	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>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.</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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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.</p> <p>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</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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>has been made to verify SUDs use? The site quickly becomes 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>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 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>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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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 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>Wildlife Habitat Networks in both Calderdale and Kirklees will be fully considered in a joined-up approach.</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 Thornhills 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 Thornhills 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>

Consultee	Comment	Council response and SPD amendment (where applicable)
		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>Page 48</p> <p>How does the closure of Shepherds Thorn Lane work in relation to access to Bradley Wood Scout Camp? See previous comments.</p>	See previous responses.
	<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 Thornhills 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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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 whether people would be willing to negotiate this once out of the garden community.</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>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 Brighouse 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>This comment is outside the scope of this consultation.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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>Page 79</p> <p>Density is significantly more than the Local Plan proposal (appendix 1 confirms this was 28 dwellings/hectare). The 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>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>Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road, Brighouse 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</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</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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>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. 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>CHARACTER AREAS</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>The Council agrees to the suggested naming modification.</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>

Consultee	Comment	Council response and SPD amendment (where applicable)
		<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.</p>	<p>See above response regarding consultation with the Environment Agency and the Council's Drainage Team at phased application submission stage.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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>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 existing properties and their protection, would be through a rich ecological buffer, in keeping with the garden community ethos.</p>	<p>Noted – representation to be made at detailed planning application stage.</p>
	<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 Draft Thornhills Garden Community Design Code SPD 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</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
		<p>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>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>As highlighted in Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road, Brighthouse 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>
	Are there any diversions of the PROW proposed?	No PROW diversions are currently proposed although this will be clarified at phased planning application stage.
	Bradley Wood Area	The Council's Conservation Team have been consulted throughout the Local Plan process, in the production of this

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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>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 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>

Consultee	Comment	Council response and SPD amendment (where applicable)
		<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 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>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>	<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 Thornhills 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>
	<p>The LEAP is not within the required 400m distance. Provision is deficient.</p>	<p>See above response</p>
	<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>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</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</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	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.	other evidence bases such as the Heritage Impact Assessment, informed the detailed design code. 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. 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.
	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.	Although bat transit routes are not legally protected, they are an important consideration that will be taken into account at the planning application stage. 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.
	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.	See above response regarding open space provision.
	The main hedgerows are on the western side not as shown on eastern side. This needs to be reflected in the plan.	Council agrees to amend the character area plan and general masterplan(s) to show main hedgerows on western side of Firth House Lane, with less significant ones on eastern side.
	Firth House Farmsteads Area We agree the setting and listed assets need to be adequately protected and enhanced in accordance with the Heritage	The Council's Conservation Team have been consulted throughout the Local Plan process, in the production of this

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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.</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 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>

Consultee	Comment	Council response and SPD amendment (where applicable)
		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</p> <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>	See above comments regarding density and the requirement for a phase specific HIA.
	<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</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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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>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>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>Joint working with the Clinical Commissioning Group (CCG) around the delivery of primary care health and wellbeing</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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>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>
	<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?</p>	<p>The second community centre located at the cricket ground highlights the possibility of improved facilities as part of the secondary access developing proposal.</p>
	<p>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>	<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> <p>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>
	<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</p>	<p>Noted – as above.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	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.	
	School 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 both adjacent to and on the school site. There is no mention of these or the impact on them. How is this being addressed?	Please see previous responses.
	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.	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. 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.
	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	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.

Consultee	Comment	Council response and SPD amendment (where applicable)
	NEAP? How will it be accessed by the community if it is part of the school grounds?	
	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.
	Page 112 – we do not understand what GRP is. You need to explain and not use three letter abbreviations. Requirements seem acceptable/adequate and support the emphasis on quality.	Agreed - Amendment necessary.
	PUBLIC SPACE 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.	Noted.
	P121 Lighting 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.	The subject of lighting is considered in the draft Draft Thornhills Garden Community Design Code SPD at section 4.6.16. Lighting will also be considered at the planning application stage. A Lighting Assessment is included in Appendix 2 - Validation Requirements of the Draft Thornhills Garden Community

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>Public Art</p> <p>Recycling of existing materials from the site must be considered ie stone</p>	<p>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>	<p>See above response regarding tree protection policies at both local and national level.</p>
	<p>Inclusive Design</p> <p>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>	<p>Inclusive Neighbourhoods is a key ethos of the Garden Communities as identified in the Vision and Core Objectives Chapter.</p>
	<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 Draft Thornhills Garden Community Masterplan SPD and associated Draft Thornhills Garden Community Design Code SPD as they emerged.</p> <p>Representatives of public sector agencies including the Environment Agency, Yorkshire Water, Sport England, West</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
		<p>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>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.</p>	<p>See above response regarding scope and extent of public engagement and methods employed.</p>
	<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 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>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>COMMUNITY STEWARDSHIP</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</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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 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</p>	<p>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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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 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>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 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>

Consultee	Comment	Council response and SPD amendment (where applicable)
		<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>Noted –various suggested amendments have been passed to the masterplanning team.</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>The masterplan is provided on page 22 of the document.</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</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</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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>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>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>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>Where will these new runs or connections be made given the fall of the land and location of the railway track?</p>	<p>Utility providers are also consulted as part of the borough-wide Infrastructure Delivery Plan preparation, the Garden</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>Would the sewage have to be pumped up to the interface with Huddersfield Road?</p>	<p>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 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>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>

Consultee	Comment	Council response and SPD amendment (where applicable)
		<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>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>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 application process.</p> <p>The Council has agreed to include the following wording in relation to site access arrangements: The indicative phasing plan at section 6.1 may need to be adjusted to take account of the outcome of the phase specific transport survey work.</p>
	<p>Noise and pollution in and around the site would also have to be mitigated.</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>

Consultee	Comment	Council response and SPD amendment (where applicable)
		<p>Appendix 1 of the Masterplan document, 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.

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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 of the Draft Thornhills Garden Community Design Code SPD 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 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>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.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
		<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 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</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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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 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>Comments regarding the South-East Calderdale and Kirklees Joint Masterplanning Framework are outside the scope of this consultation.</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>Please see above responses regarding methods of engagement.</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</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
		<p>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 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 – Local Plan - Site Allocations – Supporting Information, many of which were recommended as Main Modifications by the Inspector, and it is these on which the SPD has built.</p>

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.
	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.	Comments relate to matters outside the scope of the SPD consultation. There is no suggestion that the A641 programme will be paused or cancelled.
	1.2.6 What are the viability appraisals mentioned?	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. 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. 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. See above response regarding drainage.

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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 of the Draft Thornhills Garden Community Design Code SPD 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 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>Policy Context</p> <p>Page 8</p> <p>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>	<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>

Consultee	Comment	Council response and SPD amendment (where applicable)
		<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>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>	<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>
	<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.</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 Draft Thornhills Garden Community Design Code SPD and appendix 1 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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	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?	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). The allocation of this land is outside the scope of this consultation.
	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.	The Flooding and Water Resource Management chapter of the Local Plan provides the poli-cy 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. 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.
	Page 11-12 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?	The Council's spatial development strategy was discussed at the Local Plan hearings along with its approach to supply.
	1.4.9 Where it states that individual parcels are expected to conform to the design code, this should state 'must'?	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

Consultee	Comment	Council response and SPD amendment (where applicable)
		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>	See above response regarding Landscape and Visual Impact Assessment.

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>Page 17</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? The settlement of Clifton will be lost from view once swallowed up by the Clifton Garden development/Economic Zone.</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>This particular section focuses on site constraints. Wider impacts and considerations will be taken into account.</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>	<p>Noted.</p>
	<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>	<p>The plan indicates the location of the boundary with the existing dwellings to highlight areas where careful consideration is required.</p>
	<p>The Bradley Park Dyke waterway is hidden by the site boundary.</p>	<p>The waterway is clearly labelled.</p>
	<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>Design/ layout of phased developments will encourage use as providing the most attractive route.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	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.	
	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</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
		<p>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 running through it. How does this provide a safe play and sports area?	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.
	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."
	<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>Agree to change proposed employment areas shown in Kirklees to residential in line with Bradley Park housing development.</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>
	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	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

Consultee	Comment	Council response and SPD amendment (where applicable)
	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.	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.

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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.</p>	<p>See Network of Spaces section of the design code for additional detail and explanation.</p>
	<p>Page 21-22</p> <p>Key</p> <p>This does not align with the adjacent plan as noted below.</p> <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 • 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? 	<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. The masterplanning team will make amendments to ensure clarity.</p> <p>The way that the PRoWs are 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.

Consultee	Comment	Council response and SPD amendment (where applicable)
	<ul style="list-style-type: none"> • Are all existing PROWs, shown in orange dashed lines, to be removed as only 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>Note: same applies to the masterplan in all four documents.</p> <p>The Council agrees 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>
	<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>	<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>4.3</p> <p>4.3.2 There is no secondary road shown which limits the understanding of the text and plan.</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>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?</p>	<p>See previous response regarding the requirement for a Landscape and Visual Impact Assessment.</p> <p>Amendments to wording agreed to ensure clarity.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	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.	
	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.
	<p>4.4</p> <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>Paragraph 4.4.1 defines what a landscape strategy does.</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>
	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.

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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>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>In terms of the location of the community orchards, 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 spaces? Where is the strategy to show how this will be delivered across the whole site?</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 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-</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
		<p>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?</p> <p>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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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 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 Thornhills 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>

Consultee	Comment	Council response and SPD amendment (where applicable)
		<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> <p>While the contents of the mobility hubs are yet to be finalised, provision will be based on CoMoUK guidance</p>
	<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. 	<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”.

Consultee	Comment	Council response and SPD amendment (where applicable)
	<ul style="list-style-type: none"> What does the bus stop icon mean? There is none shown on the plan. 	
	<p>Development Guidelines</p> <p>5.1 Introduction</p> <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>	See above responses concerning both residential amenity and building heights.
	<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>	See above clarification regarding the unregistered land.
	In line with the Custom/self-build SPD for sites over 100 homes, we agree 5 % of land for serviced plots should be	Noted.

Consultee	Comment	Council response and SPD amendment (where applicable)
	provided on each phase to assist those looking to build their own homes.	
	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.	Noted
	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	See above comments regarding scope and methods of public engagement.

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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.</p>	
	<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 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>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>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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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.</i>(26)</p> <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</p>	

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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 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. 	

Consultee	Comment	Council response and SPD amendment (where applicable)
	<ul style="list-style-type: none"> • 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 have hard surfacing or soft play surfacing around play equipment? Sport pitches also lack the diversity of habitat.</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>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</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</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	access provision and falls short of the 'garden community' ethos you are promoting.	<p>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>
	<p>5.7 Transport and Highway Infrastructure</p> <p>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.</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.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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.</p>	<p>A Transport Assessment is a validation requirement as stipulated in Appendix 2 - Validation Requirements of the Draft Thornhills Garden Community Masterplan SPD.</p>
	<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>	<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 alternative options were being undertaken, and Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road Brighouse is accordingly flexible in this regard.</p>
	<p>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 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</p>	<p>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.</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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	them. The traffic impacts of these strategic sites MUST be addressed now through the masterplanning process to be compliant with your own Policy IM7.	
	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?	As is standard practice each phase will take account of any approved developments at that time.
	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>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 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 (including linkages into Brighouse Town Centre).</p> <p>Appendix 2 - Validation Requirements of the Draft Thornhills Garden Community Masterplan SPD, include reference to a requirement for Travel Plans which will detail the long-term management strategies for integrating proposals for</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
		<p>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 is 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. 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 Ryecroft Lane). Principles should clearly refer to the non-heritage assets.</p> <p>Archaeological remains must also be referenced and be protected.</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>In light of advice from WYJS, additional assets have been listed in the heritage section.</p>
	<p>5.9 Climate change</p>	<p>The Renewable and Low carbon chapter of the Local Plan provides the policy framework relating to developments</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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>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>5.10 Social Value</p> <p>We agree with the Local Employment and Training Strategy</p>	<p>Noted.</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. The point at which the primary access will be required will be dependent on the results of the early phase Transport Assessments.</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>

Consultee	Comment	Council response and SPD amendment (where applicable)
		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.	<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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	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.

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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!</p>	<p>The A641 scheme has not been paused and designs are being developed.</p> <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>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</p>	<p>See above response regarding principle of using Ryecroft Lane and Woodhouse Gardens.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	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.	
	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>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>
	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.
	<p>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?</p> <p>The masterplan fails to address all these key questions.</p>	See above comments regarding the approach to primary school provision.
	<p>6.3 Developer contributions and Funding Strategy</p> <p>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</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

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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.</p> <p>The mechanism as outlined is unclear and insufficient.</p>	<p>106 obligations - see paragraphs 6.3 and 6.4 of the Draft Thornhills Garden Community Design Code SPD and appendix 1 of the masterplan. Individual section 106 agreements will need to reflect this guidance.</p>
	<p>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 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>	<p>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 disproportionate, could stymie delivery of the wider Garden Community and would not be necessary to address the requirement of Policy IM7 – Masterplanning to achieve comprehensive development.</p>
	<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>	<p>Agreed – reference will be made in the table to off-site highway improvements (not solely those linked with the A641 scheme).</p>
	<p>7 Stewardship</p> <p>Same comments as we make on page 31.</p> <p>Appendix 1 – Archaeological Record (HER)</p> <p>Appendix 2 – Line of HaHa</p>	<p>See above.</p>
1184942	WOMP54 & WODC28, THMP31, THDC27	

Consultee	Comment	Council response and SPD amendment (where applicable)
Mark and Julie Bullen	<p>SUPPLEMENTARY PLANNING DOCUMENT CONSULTATION</p> <p>Woodhouse and Thornhill Garden Communities</p> <p>Design Guide and Masterplan 2023 Comments : Mark and Julie Bullen</p> <p>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.</p> <p>General Comments</p> <p>We are both able and experienced in responding in a professional capacity to this type of document. However, the 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>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</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>There are many caveats included which seem to undermine the purpose of the document and achievement of a quality development.</p>	<p>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> <p>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>
	<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>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>

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	<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>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>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>The key on page 11 is incorrect.</p> <p>The text under paragraph 1.2.3 of the Draft Thornhills Garden Community Design Code SPD, 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>Note: same change will be made to the Thornhills Garden Community Design Code SPD.</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</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</p>

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	approximately 90 metres from south west to north east but this is not noted.	west to east of around 85m, providing far-reaching views towards Brighthouse...”
	2.1 Page 25-26 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?	This level of detail will be provided at phased planning application stage based on the advice in the Local Plan and the SPDs.
	The arrival spaces shown in the masterplan have been omitted in the regulatory plan. Why? The PROWS are not clear. The key does not match the plan in line types. The secondary hub is in different locations on other plans.	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. 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. 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. Agreed action to update the Secondary Hub location on the plan on page 29 to match the masterplan.
	The school buildings do not relate to the local hub as shown in later plans. How are the parcels of development accessed if there is only one secondary road?	The plan identifies two secondary roads, the principle of which were discussed at Local Plan hearings.

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	<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 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>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 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>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 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 Thornhills 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</p>

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		<p>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>

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		<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 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>

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	<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. 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>

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		Wildlife Habitat Networks in both Calderdale and Kirklees will be fully considered in a joined-up approach.
	<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 Thornhills 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>

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	<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 form, this view of the streetscape goes against how the local identity of Woodhouse and Calderdale looks and feels.</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>
	<p>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>	<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>5.6</p> <p>How will these active travel routes be surfaced?</p>	<p>See detail in SPD including paragraph 8.2.1.</p>
	<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>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>

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	<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>6.1</p> <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>The approach to density is outlined in paragraphs 4.3.4 and 4.3.5 of the Draft Thornhills Garden Community Masterplan SPD.</p> <p>The requested level of detail will not be available until phased applications are submitted.</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>6.2</p> <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>
	<p>7.2</p> <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>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>

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	<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>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</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>

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	<p>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 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>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>	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

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	<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>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>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>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 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</p>

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		photographs to show examples of poor designs where the predominant material is brick.
	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>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>	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>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>	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>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</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

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	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	provides some key principles which must apply to all proposals involving public art.
	<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 Thornhills 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>
	10.1	A service charge will be levied on all new homeowners to support the maintenance of the community land and facilities,

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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>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 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,</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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	especially in the 'Identity' chapter where it is so important to give a clear message and example of what is required.	
	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.	Noted – see above response.
	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 be underplayed to give a false impression of the impact of such features.	Noted
	<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>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>The proposed densities have been stated taking into account the LTN1/20 highway requirements. The developers were also aware of this requirement from a very early stage in the masterplanning process.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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>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>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</p>	<p>See above responses regarding utility provision and the drainage strategy.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	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 Masterplan document 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,</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
		such as provision of Green Infrastructure, Sustainable Transport and the Natural Environment.
	<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>
	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	The SPDs will be material planning considerations in the assessments of all forthcoming planning applications.

Consultee	Comment	Council response and SPD amendment (where applicable)
	Landscape and Visual Impact Assessment (LVIA) been carried out for the site to inform and shape the masterplan process	
	<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 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>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>
	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>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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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>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>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 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 putting 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 Draft Thornhills Garden Community Design Code SPD and appendix</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
		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 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>	See chapter 7 for detail in response.
	<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	See above response regarding suite of SPDs in conformity to advice in the Garden Community SPDs.

Consultee	Comment	Council response and SPD amendment (where applicable)
	SPDs must be in place to control the strategic sites before planning applications are considered.	
	<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> <p>Working with the topography does not seem to have been thought through in terms of accessibility when aligned with active travel.</p>	See above response regarding suite of SPDs in conformity to advice in the Garden Community SPDs.
	<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</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
		<p>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.</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

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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>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>
	<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 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>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>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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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 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>Comment noted and text reviewed by masterplanning team.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	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	
	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'.	Detail not required for plan of this nature – see following plans along with detail in the nature chapter.
	4.1.4 There is no existing park. This area is open grassland with some spoil from previous development.	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.
	There is no buffer shown between the existing community and proposed development as shown in the site constraints plan.	See previous response regarding potential upgrades to the Council-owned land as part of the access proposals.
	<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>	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>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>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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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>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>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> <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>

Consultee	Comment	Council response and SPD amendment (where applicable)
		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.”
	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 constructed first putting greater pressure on the existing infrastructure.</p>	<p>Section 4.3 of the document outlines the approach to building heights and density. See previous response regarding the requirement for a Landscape and Visual Impact Assessment.</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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	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</p>	The indicative location of incidental green spaces is marked on the plan on page 25.

Consultee	Comment	Council response and SPD amendment (where applicable)
	the Fields In Trust Guidance for Outdoor Sport and Play: Beyond the Six Acre Standard? What is the hierarchy of these spaces?	<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.</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>
	Why is the village green not in the centre of the garden community as the focal point rather than playing fields or a shop?	The village green will be a key component in creating a sense of arrival to the Garden Community.
	Providing an arrival space adjacent to the secondary access point would indicate this would become a primary route.	See above response for explanation and detail.
	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?	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).

Consultee	Comment	Council response and SPD amendment (where applicable)
		The overall open space provision is considerable higher than Local Plan policy requirements.
	<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 Thornhills 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>

Consultee	Comment	Council response and SPD amendment (where applicable)
		Discussions have been taking place regarding the requirements for bus provision
	4.5.3 What does this mean? This appears to be a woolly description with no substance.	<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> <p>While the contents of the mobility hubs are yet to be finalised, provision will be based on CoMoUK guidance</p>
	<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>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)”

Consultee	Comment	Council response and SPD amendment (where applicable)
		within the red line, regardless of whether they are impacted or not.
	<p>5.6</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>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>
	<p>6</p> <p>6.1</p> <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</p>	<p>The traffic impact of the development has been considered as part of the Local Plan modelling process.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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 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 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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	What is meant by the 'TBC' on the cricket pitch area and open space?	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 11year 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 surely this goes against the council's argument for the need for this garden community? 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 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? How will this demand be addressed? There appears to be nothing in place to secure facilities.	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 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.

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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>	<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>	<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>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>See above response regarding principle of using Ryecroft Lane and Woodhouse Gardens.</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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	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?	The requirement for the primary access will be dependent on the outcome of the phase specific transport survey work.
	Property Specific 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.	See above comments regarding the approach to drainage.
	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>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 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>

Consultee	Comment	Council response and SPD amendment (where applicable)
		space standards that will be applied in assessing residential development proposals.
	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.	See previous comments regarding site wide and phased specific drainage work.
	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>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>
	General Comments As on the design guide these are:- Appearance:	This section contains duplicate comments. For detailed responses to the range of comments made, please see above.

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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>	

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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>	

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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>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>	
1185621	THMP34 & WOMP56, WODC29, THDC28	The Town and Country Planning (Local Planning) (England) Regulations 2012 require a Local Planning Authority to

Consultee	Comment	Council response and SPD amendment (where applicable)
Clifton Village Neighbourhood Forum	<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>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</p>	<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.</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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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> <div data-bbox="392 868 1216 986"> <p>2.4 The Forum calls on Calderdale Council to suspend this consultation pending the outcome of the High Court hearing.</p> </div>	<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 isolation, meaning it is impossible to provide meaningful responses in the context of wider local planning policies.</p>	<p>See responses below.</p>
	<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</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</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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>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> <div data-bbox="392 1142 1216 1358"> <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> </div>	<p>Noted.</p> <p>Comments outside the scope of this SPD.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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> <div data-bbox="394 531 1216 654"> <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> </div>	
	<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>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>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 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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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="394 531 1216 683" 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 is accordingly flexible in this regard: <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 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</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, 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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	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>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> <div data-bbox="394 564 1216 691"> <p>Recommendation: Suspend this consultation until the Open Space SPD is available for comment simultaneously</p> </div>	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>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> <div data-bbox="394 1225 1216 1380"> <p>Recommendation: Suspend this consultation until the Placemaking and Design Guide SPD is available for comment simultaneously</p> </div>	<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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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 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 of the Calderdale Local Plan, which ensures schemes respect and enhance the character and appearance of existing buildings and surroundings.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
		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.
	Land use 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.	Comment noted
	Building heights and density 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. 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>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>

Consultee	Comment	Council response and SPD amendment (where applicable)
		<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. 	<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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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> <p>Recommendation: Upholding policy HS4 must take precedence over applying the minimum 30 dph density on strategic sites</p>	
	<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 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>
	<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.</p> <p>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>	<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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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 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 100% of new dwellings can be built compliant to M4(2) • 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 1187 1207 1321"> <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>The possibility of substituting bungalows for conventional houses is contained in the current informal guidance</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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 requirements was not included in published Viability assessments or previous sensitivity evidence.</p> <div data-bbox="394 517 1209 667"> <p>The ability for developers to substitute one affordable bungalow for two affordable houses must be deleted from bullet point 3.</p> </div>	<p>(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 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>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)
	<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>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>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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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 data-bbox="394 512 1171 643" style="border: 1px solid black; padding: 5px;"> <p>Recommendation: A travel plan must accompany each phase to demonstrate how each phase will contribute to active travel.</p> </div>	<p>With regards to healthcare provision on site, see paragraph 6.2.8 in the Draft Thornhill Garden Community Masterplan SPD.</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>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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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>4.26 Development of the IDP must be open to public consultation and scrutiny, with any subsequent changes justified evidentially.</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 is accordingly flexible in this regard: <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>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>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.</p> <p>4.28 The development guidelines fail to address the traffic impacts, and no development should be permitted on either</p>	<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.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	site without a robust transport model and an up-to-date Transport Assessment.	
	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.</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>Phasing and Delivery</p> <p>4.33 (6.1.1) The phasing plan is meaningless because it includes no timescales.</p> <div>Recommendation: Add timescales to phasing and delivery plan</div>	Refer to Paragraphs 6.1.3 to 6.1.6 of the Draft Thornhills Garden Community Masterplan SPD .

Consultee	Comment	Council response and SPD amendment (where applicable)
	Infrastructure delivery 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.	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.
	Education 4.35 (6.2.6) Secondary school provision is missing. Travel mitigation for not providing secondary provision is unclear.	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.
	Healthcare 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).	This is explained in paragraphs 6.2.8 and 6.2.9 of the Draft Thornhills Garden Community Masterplan SPD
	Highways 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.	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	

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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 106 obligations (see Section 6.3 of the Draft Thornhills Garden Community Masterplan SPD)</p>
	<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</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</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	imbalanced split was proposed between the two strategic sites; what evidence is available to confirm this has changed?	yield anticipate from the new homes, at the time of commission. These are all variable.
	<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> <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 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> <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>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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	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?	
	APPENDIX 1 – anticipated S106 requirements for each phase 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.	The approach is set out in Local Plan Policy IM7 – Masterplanning Part VII.
	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.	Housing completions will be set out in the Authority Monitoring Report.
	APPENDIX 2 – validation requirements 4.48 (Planning Statement) This paragraph is full of errors and needs re-writing 4.49 (Landscape Visual Impact Assessment) – MUST be produced for every development adjacent to existing Clifton and Thornhills dwellings.	As above, the wording of section 4.3.3 of the Draft Thornhill Garden Community Masterplan SPD will be strengthened to ensure clarity.

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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>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 data-bbox="394 1002 1216 1101"> <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>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>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 paragraph 4.4.6 of the Draft Thornhill 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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>Site constraints</p> <div data-bbox="394 347 1196 549"> <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 data-bbox="394 1010 1196 1102"> <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> <div data-bbox="394 1166 1196 1342"> <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 Brighouse developments.</p> </div>	<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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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 guidance on page 89 says that detached dwellings should be used 'sparingly' close to the local centre but does not preclude their use. The intention of the guidance is to encourage building forms which create a greater sense of enclosure and through this, a distinct development character reminiscent of the tight-knit cores of existing settlements. It is also worth noting that larger family homes can successfully be delivered as terraced or linked dwellings, so a broad mix of dwelling sizes - which will promote community cohesion - can effectively be delivered with or without detached typologies.</p>
	<p>Oak Hill Bank (7.2.6)</p> <div data-bbox="394 751 1216 866" style="border: 1px solid black; padding: 5px;"> <p>5.8 Development adjacent to boundaries MUST NOT exceed two storeys in height</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>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>

Consultee	Comment	Council response and SPD amendment (where applicable)
		<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>
	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	Appendix 1 – Site Number LP1463 – Land between Highmoor Lane and Bradford Road, Brighouse of the Local Plan requires

Consultee	Comment	Council response and SPD amendment (where applicable)
	the unique characteristics by increasing the land buffer and restricting high-density development.	<p>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 of the Calderdale Local Plan, 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>
	Hartshead Gateway (7.2.8)	The Council considers that this is covered in sufficient detail for the SPD. Planning application will need to demonstrate how this can be implemented.

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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>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> <p>In addition, the Draft Thornhill 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.</p>
	<p>6 Woodhouse Masterplan Supplementary Planning Document</p> <p>Air quality</p> <div data-bbox="394 1066 1205 1201"> <p>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.</p> </div>	<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>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</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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	unacceptable and has denied the community a right to help shape the proposal.	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 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.	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. Policy IM7 – Masterplanning requires proposals to adhere to the principles set out in the National Design Guide.
	Site constraints 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. 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.	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. Policy BT2 – Privacy, Daylighting and Amenity Space of the Local Plan provides the policy framework for securing adequate space around buildings.

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>The development is a mass-housing proposal and 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.</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> <div data-bbox="394 767 1200 1114"> <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> </div>	<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>

Consultee	Comment	Council response and SPD amendment (where applicable)
		<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>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>6.9 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 – Principles of Development, of the Draft Woodhouse Garden Community Masterplan SPD.</p> <p>Planning applications will be assessed against Local Plan Policy HS3 - Housing Mix, which Paragraph 5.2.1 reflects.</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>	<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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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>	<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>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 1206 1207 1318"> <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>The possibility of substituting bungalows for conventional houses is contained in the current informal guidance</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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="394 515 1216 636"> <p>The ability for developers to substitute one affordable bungalow for two affordable houses must be deleted from bullet point 3.</p> </div>	<p>(Affordable Housing Supporting Guidance 2018) which provides guidance to developers on meeting the Borough's affordable housing needs:</p> <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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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> <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> <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 work. The proposal is already half the size stated during the</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</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	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.	area of Calderdale showing existing school places alongside the anticipated new demand for places. 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.
	Green Infrastructure 6.18 (5.5) Without the Open Space SPD, it is impossible to provide meaningful comment	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.
	Development Guidelines – Transport and Highway Infrastructure 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.	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. 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 is accordingly flexible in this regard: <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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	6.20 Development of the IDP must be open to public consultation and scrutiny with any subsequent changes justified evidentially.	<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> 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.
	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. 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.	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.
	Climate Change 6.25 (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	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

Consultee	Comment	Council response and SPD amendment (where applicable)	
	<p>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>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>Phasing and Delivery</p> <p>6.27 (6.1.1) The phasing plan is meaningless because it includes no timescales.</p> <table><tr><td>Recommendation: Add timescales to the phasing and delivery plan</td></tr></table>	Recommendation: Add timescales to the phasing and delivery plan	<p>Refer to Paragraphs 6.1.3 to 6.1.6 of the Draft Thornhills Garden Community Masterplan SPD.</p>
Recommendation: Add timescales to the phasing and delivery plan			
	<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>	

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>Healthcare</p> <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.</p>	<p>This is explained in paragraphs 6.2.8 and 6.2.9 of the Draft Woodhouse Garden Community Masterplan SPD.</p>
	<p>Highways</p> <p>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.</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>6.32 (6.2.17) This statement lacks detail on the engagement strategy</p> <p>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.</p>	<p>Any planning application will be subject to mandatory public consultation.</p> <p>Refer to Paragraph 6.2.18 of the Draft Woodhouse Garden Community Masterplan SPD, which states that 'any variation must be thoroughly justified...'. </p>
	<p>Developer contributions and funding strategy</p> <p>6.34 (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 106 obligations (see Section 6.3 of the Draft Woodhouse Garden Community Masterplan SPD)</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<p>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.</p> <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>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>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.</p> <p>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>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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	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>APPENDIX 1 – anticipated S106 requirements for each phase</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>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>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>As above, the wording of Section 4.3.3 of the Draft Woodhouse Garden Community Masterplan SPD will be strengthened to ensure clarity.</p>

Consultee	Comment	Council response and SPD amendment (where applicable)
	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.	The Council consider this is not an unreasonable statement to make.
1340743 Yorkshire Sport Steven Heywood	<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 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>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>

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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. 	<p>Local Plan Policy HW5 - Sustainable Local Food Production Part III applies to all new development.</p>
	<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 	<p>Provision of community growing spaces provides opportunities for this, but links to school curriculum is beyond scope of SPD/planning.</p>
	<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 should be considered along the disused railway line green corridor. 	<p>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.</p>
	<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 	<p>Noted. Local Plan Policy GN3 - Natural Environment would apply to any planning application.</p>
	<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 Thornhill 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>

Consultee	Comment	Council response and SPD amendment (where applicable)
		In addition, Paragraph 5.5.1 refers to provision of a network of multi functional green spaces.
	<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 lessen the impact from vehicle on 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 GN2 – A Joined-Up Green Infrastructure Network and 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 Well-designed vegetative 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 	Refer to Local Plan Policy CC3 - Water Resource Management Part I
	<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 Housing Mix and Affordable Housing will apply to any planning applications.

Consultee	Comment	Council response and SPD amendment (where applicable)
	<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 none 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 crate rich new model planting communities (see Pictorial meadows) Its 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 The landscape should have a continuous seasonal and successional change 	Refer to 4.6.22 Draft Thornhills Garden Community Design Code SPD for information on Planting Strategy.
	<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 hander dover 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.

Consultee	Comment	Council response and SPD amendment (where applicable)
	<ul style="list-style-type: none"> All trees should have maximum protection from petrol drivell management tools and key infrastructure implement to ensure maximum survival rates. See Plating 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 crucial that traffic does not come anywhere near children on their cycle and active transport routes on journeys to schools and key destination. Use of clever landscape buffers is fundamental to this 	Refer to the design principles underpinning the ethos set out in Section 2 of the Draft Thornhills Garden Community 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> <p>Useful links:</p> <p>https://www.westyorks-ca.gov.uk/media/10739/230710_safer-parks_double-page-spread_web.pdf</p>	Noted

Consultee	Comment	Council response and SPD amendment (where applicable)
	https://www.sportengland.org/news-and-inspiration/new-active-design-guidance-published https://www.arup.com/perspectives/cities-alive https://www.yorkshiresport.org/what-we-do/data-insight/make-space-for-us/ https://whiteroseforest.org/about/actionplan/#:~:text=Action%20Plan%202021%2D25&text=Seven%20million%20trees%2C%20the%20equivalent,Government's%20Nature%20for%20Climate%20fund.	

THDCEnd