

Calderdale Local Plan: introductory comments

As a Town Councillor for Stansfield Ward in Todmorden I have misgivings about the viability of all five housing sites proposed for this ward. Doubts arose in 2016 when planning officers from Calderdale visited the Town Council Development Committee to present initial drafts of their plans. The maps they showed us were sometimes inaccurate, with some roads, for example, branching off from the main Halifax Road in the wrong direction.

Such mistakes are not unusual for CMBC. Over two years ago, for instance, my address was suddenly altered from Broad Gate to Upper Shaw Wood Road, a road which lies about two-and-a-half miles away on the opposite side of the valley. It took years to get this corrected.

Similar inattention to detail is visible in the final draft of Calderdale's Local Plan, at least as far as it affects parts of Stansfield Ward. Reference here is not so much to editorial slip-ups such as officially labelling **LP1637** 'land in front of Bardnor House' instead of 'Bradnor House', or calling Victoria Road on occasion 'Victoria Street'. The mistakes go far beyond such matters. Below, aided by comments from residents, I wish to cast some light upon both general failures in the Local Plan as far as it affects Stansfield Ward and ones more specific to the five LP sites.

1. Traffic: the Halifax-Burnley 'rat run'

Something which has eluded planners is that four of the potential sites (**LP0901 / 0640 / 1637 / 1544** – yet to be confirmed) lead on to the same road (Hallroyd Road / Woodlands Avenue / Stansfield Hall Road / Victoria Road). This **one** road is used as a short cut for motorists driving between Halifax and Burnley and seeking to avoid Todmorden town centre. Four residential access roads have in effect become a Todmorden bypass, with all the dangers this entails, bearing in mind the lack of pavements. Five more factors make the traffic situation as envisioned on the LP even worse:

1.1 The cumulative impact of an extra possible 176 cars (1.5 per dwelling) on this short, winding and already hazardous stretch of road is troubling. The plans appear particularly incongruous in view of the fact that in 2017 planning permission was refused for slight expansion to a dance studio on Victoria Road, which might have led to around ten extra cars on the road per day – a decision upheld on appeal

1.2. The road is single-track at both ends, with a bridge over the railway at one end and on-street parking at the other, with much of the latter in between, forming at certain times of the day a one-way shuttle system

1.3. All four sites are either on or very close to 90 degree bends – the speed limit is 20 mph, but few drivers adhere to it, especially where Woodlands Avenue meets Stansfield Hall Road, directly opposite **LP0640** and the entrance to Stansfield Hall

1.4. There are a further eight roads and four cul-de-sacs leading on to the road (with a further eight cul-de-sacs leading onto just one of those cul-de-sacs), bringing more traffic in normal conditions and considerably more on-street parking in winter – all of the cul-de-sacs are too dangerous to drive down in icy conditions (The Hollins being one of them: **LP0640**), so in bad weather it is normal for residents of The Hollins and The Mount, for instance, to park on the main road

1.5. But perhaps there is little chance of anything being built along this road since the rail bridge on Hallroyd Road will only take vehicles up to 7.5 tonnes and using the single track Victoria Road at the other end of the road might well not be feasible.

Conclusion: In the LP, planners either ignore the highways problems altogether or they state that Victoria Road or Stoney Royd Lane, for instance, need ‘improving’, without suggesting how they can be widened, or even straightened.

2. Access

There are access problems with all of the proposed sites.

2.1. **LP0901** (Denis’ Field) looks relatively straightforward from this point of view, but access would be only about 20 yards from the Woodlands Avenue / Stansfield Hall Road blind bend mentioned above – and below

2.2. The access problems with **LP0640** are manifold. First, anyone driving up Hallroyd Road and attempting to cross to The Hollins would have to navigate a blind bend in the face of three-way traffic (counting the entrance to Stansfield Hall). Secondly, like Stoney Royd Lane (**LP0651**), The Hollins is a private road, and it is unclear how access could be obtained. Furthermore, thirdly, like Stoney Royd Lane, it is single track. How it could cope with a further 79 vehicles, or, in the case of Stoney Royd Lane, 93, is difficult to imagine. Nor should we forget that The Hollins has no pavements, so it is not only drivers who would be at risk.

2.3. With **LP1637** and the adjacent **LP1544** the situation is in some respects worse. The only access is via a single lane track which at the moment carries a Calderdale sign saying **Unsuitable for motor traffic**. The track has no passing places at all and has several blind bends. The access has already been examined by planners and each time found to be wanting. And the number of houses people hoped to build previously was two or three, not forty-eight: Appeal Reference APP/A4710/A/04/1141161 (2004) and Application Number 16/00852/OUT (2016). Nor would it be possible to widen the access point since this consists of a Grade 2 listed wall on one side and a modern house on the other – with TPOs on both sides.

3. Land stability

3.1. This affects all five proposed sites. In 1975 Calderdale invested £40,000 of taxpayers’ money to purchase land off Park Road to build a remedial school c. 250 yards from **LP0640**. Within three months of the foundations being laid, cracks

appeared in the land, a retaining wall was broken and measurements showed the land was unstable. The site was abandoned and sold back to the original owner for £1. Landslips have since occurred throughout the field, especially at the top, where two houses were severely affected by subsidence in the 1990s and the path to the east of them began to collapse. The evidence is sadly still there.

3.2. Calderdale rejected planning permission to build a housing estate in the same field in 1992. The landowner appealed to the Planning Inspectorate, but the residents turned to Dr Frank Howell, a prominent geological engineer, who carried out a full Geotechnical Survey which demonstrated that the site was severely affected by slippage. The Planning Inspectorate dismissed the landowner's appeal and accepted the evidence of the survey (**T/APP/A4710/A/92/216955/P2**). It is disappointing that the only site for which a Land Stability Report is required by planners for the Local Plan is **LP0651**, though it would have been difficult for them to ignore the recent evidence of land movement on and around the site.

3.3. None of this, of course, can be taken as proof that the sites proposed sit on the same paper-thin shale rock as the Park Road site, or that they are inherently unstable. But with mudslides and land slippage being so common in the area, including on Billy's Back (**LP0640** is known as Billy's Front) right behind The Hollins – planners were handed detailed maps of slippages in Town Council – it does seem irresponsible, or reckless, not even to consider carrying out full geotechnical surveys on all the sites. Hydrological surveys, often mentioned by the planners, would not be irrelevant, but they must be accompanied by hydro-geological ones, which would indicate whether the land is fit for construction work or not, despite all the other problems.



LP0640 is the field in front; below is Stansfield Hall Road; above is The Hollins, and above that Billy's Back. The field to the left is the Park Road site where the school collapsed in 1976. This picture (copyright Craig Shaw) is also relevant to sections 4 and 5.

4. Flooding

Planners do seem to be aware of some of the flooding problems connected with the proposed sites. On three of them (**LP1544** has yet to be confirmed), Flood Risk Assessments are rightly included among the 'required reports'. But they would only cover the individual sites. They ignore the fact that at present, acting in part as retention basins, every one of these sites serves to 'slow the flow' of surface water from the hills towards properties lower down.

4.1. **LP1544** would have a huge impact on the dwellings on Hillcroft Road – the site is not a 'gentle slope', as claimed, but a steep one descending straight into the back gardens of the residents

4.2. **LP1640** would similarly affect adjoining houses on Stansfield Hall Road, most of which already have pumps in their basements. In poor weather, the site develops a pond in the middle, attractive to ducks and geese. Construction work here would definitely *speed* the flow, if it were to go ahead

4.3. **LP0651** is not as it appears on the map submitted as part of the planning assessment – it is a steep field backed by a railway cutting and full of culverts and land drains carrying water from beneath the railway to lower levels. Blockages, leakages and damaged culverts have frequently caused flooding on the lane and in the houses. For these reasons, Stoney Royd Lane is on the Environment Agency Alert list and should be removed from the list of LP sites

4.4. For **LP0901** (Denis' Field), there is no mention of a Flood Risk Assessment. However, Woodlands Avenue has serious drainage issues, and Denis' Field acts as a sponge to absorb excess water – it quickly becomes boggy during autumn and winter months. Also, the proposed removal of woodland would raise the threat of flooding in the area as a natural source of drainage would be gone.

5. Visual Amenity

In a 2017 survey carried out by the Town Council as part of the Neighbourhood Plan, Todmorden residents were asked what they valued most about the town. Nearly 70% replied its 'rural aspect'. This is largely due to the green spaces between built-up areas and the visibility of the surrounding hills between buildings. Importantly it is not only the people of Todmorden who enjoy this feature, for it is also what underpins our main industry: tourism.

5.1. **LP0640** was considered seriously as a 'Green Space' in the previous Unitary Development Plan. One cannot at present walk on the land, but The Hollins which adjoins it is a popular route to the Calderdale Way in Todmorden. The site

contributes significantly to visual amenity in Todmorden as a whole. It provides an aspect above the town centre and a special feature when viewed from Centre Vale Park and the opposite side of the valley. The large-scale housing development currently proposed would destroy this asset and discourage walkers

5.2 The same is true for walkers using the access paths for **LP1637**, **LP1544** and **LP0651**. The suggested changes would make it more difficult for them to go about their business, with knock-on effects to physical and mental health. At present one enters the **LP0651** site via an access point with a sign for Calderdale Way – yet another indication that the planners are probably working at computers rather than visiting the sites.

5.3 **LP0901** is different in that it is a park: a destination rather than a route, but one where young people in particular exercise. It is not as widely visible as **LP0640**, for instance, but, for those who use it, it is a vital green space. Protests include letters from all the primary school headteachers of Todmorden.

6. Further details on each of the sites

6.1 **LP0640** The mitigation deemed necessary by planners owing to potential flooding from Oak Hill Clough is irrelevant. The stream flows from north to south down Meadowbottom Road, not eastwards, parallel to Stansfield Hall Road, so it does not affect the site – a further demonstration of Calderdale’s lack of local knowledge / inability to read maps.

6.1.1 More importantly, in the Site Assessment Report, ‘Physical Constraints do include Steep Slope /Undulations or Unstable Land (RAG RED)’, but none of these considerations are included in the overall assessment summary.

6.2 **LP0901** The site assessment provides a possibly misleading account of the state of the land by simply labelling it as ‘Greenfield’. Local knowledge has it that the site has been subject in the past to large-scale landfill / land-raising, possibly from the construction of the adjacent railway. What is needed is a land contamination survey.

6.2.1 Local knowledge has it too that when the terraced houses of Woodland Avenue were completed in the 1890s, there were plans to build a parallel set of terraces on the proposed site, proposals that were abandoned owing to concerns over land slippage. Calderdale appear to have believed this since, when the previous owner (*Denis Crabtree*) applied to build housing on the site, the application was refused. This does not mean that the Victorians and Calderdale were right to be concerned, but it does mean that a proper land survey needs to be carried out on this site as much as on all the others.

6.2.2 Currently, the site is well used as a children’s playground, community orchard and informal open space (dog-walking, football, picnics etc). Many of its users, especially those ethnic minority children from the Wellington Road area, living in

terraces with no garden of their own, are able to access the space via a footbridge over the railway, i.e. without needing to cross the rat run

6.3 LP1637 / LP1544 Like Denis' Field, this site was not included on the 2017 consultative LP. The main points – highways problems, access, land slippage and flooding have already been covered. Local residents raise a further issue: that the land is currently a green space corridor offering habitats to deer, badgers, owls, and much more fauna and flora.

6.4 LP0651 Three further details from a resident of Stoney Royd Lane:

6.4.1 Access – The lane itself is supported on the river side by a dry stone wall with a 12 ft drop into the River Calder. The lane is in part 11ft 9” wide, from river edge to the garden walls. There are no pavements. In fact, if the present lane structure is to be preserved, the lane quickly turns into a footpath about 6 ft wide. It is not surprising that planners have suggested another route onto the site, one though, that is difficult to analyse since it does not yet exist.

6.4.2 Land and floods – Network Rail have recently carried out extensive remedial work to a large Victorian culvert which runs under the railway line and down the proposed site. The culvert had collapsed and the likely cause was thought to be land movement. Network Rail have also been carrying out repair work to the railway lines themselves due to bending. This too is thought to have been a result of land movement, both past and present.

6.4.3 Personal fears – If this land were disturbed, residents fear that damage to the culverts and drains would be inevitable and they would seriously fear for their safety. This fear comes from their experience of previous flooding, which has been like ‘dam bursts with huge deluges of water’. Furthermore, they believe they would be even more susceptible to flash flooding. On four separate occasions, planning applications have been refused for this site, the last one deemed necessary by Calderdale to be defended at the Appeal Centre in Bristol. Since that time, apart from a collapsed river wall and road on Stoney Royd Lane, as well as several floods, nothing has changed – as far as the residents are concerned.

7. A positive suggestion: One recommendation made by virtually all residents who commented on the rat-run sites was that the Adamroyd Mill site on Victoria Road should once more be allocated to the housing section of the Local Plan. Planning permission, according to LP documentation, lapsed on 17 February 2017. At present it is still included in the Neighbourhood Plan, but no longer in the Local Plan. There might well be contamination problems, but there is no suggestion in the LP that these have been looked into. And if there are genuine flooding concerns, that surely rules out development on every single one of the sites mentioned above.

