

We wish to object to the Proposed Development and have the following comments;

Section 1.0

Impact on residential amenity

Relevant sections of the Kirklees Local Plan are:

LP52 Protection and improvement of environmental quality - noise, light and pollution

LP63 New open space

Many properties on Lingards Road including ours enjoy the following residential amenities:

- a high level of privacy
- freedom from being overlooked
- a peaceful rural location - free from light pollution and noise disturbances
- unrestricted views along and across the Colne Valley

The Kirklees Local Plan says that any impact on residential amenities for present and future occupiers should be minimised.

We strongly object to the proposed development as we would experience a detrimental impact to all of the following amenities.

1.1 Impact on Privacy - Sightlines for Overlooking the New Properties from Lingards Road

In our view, the developer's site sections through Lingards Road and the proposed development (sections A-A to C-C) do not accurately represent the sight lines from existing properties on Lingards Road into the rear of the new dwellings. Quite a few of the existing houses on Lingards Road are effectively 3-storeys high and will have a direct view into bedrooms and living spaces to the rear of proposed house numbers 30 to 38, unless substantial trees are planted on the severely sloped bank called 'Public Open Space' on Drg. No. 2019-572-20.

1.2 Nuisance that would be caused by increased activity, noise and light disturbance

Lingards Road enjoys a high degree of peace and quiet with open views across the Colne Valley. Properties along Lingards Road form a linear development - a single row of houses that follow the line of the road. Back and front gardens along most of Lingards Road are private and are not overlooked. There is a high degree of privacy and low levels of noticeable activity and intrusion amongst properties.

There is almost no noise and disturbance to either the front or rear elevations especially in the evenings. The surrounding fields, to the front and rear of the properties, which have a wealth of wildlife, are dark and undisturbed.

Privacy, peace and quiet is an amenity.

Freedom from both noise and light disturbance is an amenity.

1.3 Noise disturbance

We would anticipate a much increased level of noise and disturbance from traffic noise, from the close proximity of houses and gardens and particularly from the creation of elevated outdoor social spaces. We note that roof terraces are included in many of the designs on the proposed development.

Roof terraces are not a feature of existing houses in the local area, properties tend to have usable ground level garden space to both the front and rear of the houses. The lack of usable garden space

on this development means that the proposed roof terraces will likely be used as the principal outdoor socialising area.

Given the close proximity of these new homes to our house, to other properties and to each other and given the extreme low level of normal background noise on Lingards Road, any sounds from the proposed development would be experienced as a significant increase. Noise from elevated spaces would carry and be amplified by the valley slopes. This is a quiet area and the change would be considerable. This would be experienced by us as disturbing and intrusive a negative impact on our immediate environment and amenities.

1.4 Light disturbance

We would experience much increased light levels due to spillage from light on the roadways, spillage from the houses, and from the roof terraces referenced above and other outdoor spaces.

The roof terraces in particular appear to have toughened glass balustrades (or similar) which would also be light reflective.

At present this undeveloped area remains in total darkness at night so this would be a significant and unwelcome change to our much valued amenity.

There can be no question that the proposed development would very significantly increase the noise and light disturbance we experience. We object to this and to the loss of residential amenities - silence and freedom from disturbances - that would be caused.

1.5 Impact on views and change of character

From our house we have unrestricted views of open countryside up and across the Colne Valley.

The fields on Lingards Road provide our immediate green view and of course give us the wide, open aspect that is valued and enjoyed.

These will be replaced by views of a dense housing development with a fractional amount of retained green space. The concentration of buildings in particular will affect the views we enjoy and importantly the sense of openness and space we have. Looking out from our windows will feel like being in the centre of an urban area. This will mark the most significant change to our life here.

1.6 Public Open Spaces

The developer's Drg. No. 2019-572-20 shows Public Open Spaces (POS) which include the existing steep banking bordering Lingards Road. This area (1200sqm) is a significant part of the overall POS areas (total area 2950sqm) on the site but is in fact a steep bank (see levels) and is completely unusable on a practical level.

Other POS areas on the drawing are existing streams and water tanks and are not actually usable spaces for children playing, communal gatherings, etc.

We therefore believe that the impression given by the drawing overstates the true nature of the POS areas and in fact most of the development consists of hard landscaping.



Illustration of the main POS area on the site

Our Objections are:

- **Loss of much valued residential amenities**
- **Increase in noise pollution - and specifically the inclusion of roof terraces as outdoor social spaces**
- **Increase in light pollution**
- **Loss of privacy. The positioning of the buildings throughout the development will create overlooking of neighbouring properties throughout. Properties on Lingards Road will also overlook the private gardens and rear facing rooms of adjacent dwellings**
- **The transformation of the existing character of Lingards Road**
- **The inclusion of land which is totally unusable as 'public open space'**

Section 2.0

Design

Relevant sections of the Kirklees Local Plan are:

LP26 Renewable and local carbon energy

LP27 Flood risk

LP28 Drainage

LP29 Management of water bodies

LP32 Landscape - protect and enhance the characteristics of the built, natural and historic environment

LP34 Conserving and enhancing the water environment

LP35 historic environment

LP43 Waste management hierarchy

2.1 Future Proofing the Design of the Buildings

The government has published (Nov. 2020) a ten-point plan for a green industrial revolution, part of which requires that buildings will be made more fuel efficient and move away from the use of fossil fuel (gas) boilers – this also accelerates previous timetables.

New homes need to be built with high levels of insulation and low carbon heating. One way to provide low carbon heating is by the installation of heat pumps.

New homes should be built to the 'Future Homes Standard' which is due to go ahead by 2025 and will ensure homes will be 'zero carbon ready'.

The Kirklees Local Plan refers to alternative ways of heating homes such as the use of bio-mass boilers. With many of the houses being built into the hillside, with large underground concrete voids, these could be utilised as bio-mass storage areas.

In the SB Homes application there is no mention of any sustainability measures relating to the building construction or energy usage of the homes, except the possible installation of solar panels on two detached houses.

In our view this will lead to the majority of homes being out of date within just a couple of years of construction, as applying high levels of insulation or triple glazing to a home post construction is not always feasible or cost effective based on the payback period to a typical owner occupier.

Also, the use of low carbon heating, heat pumps and systems such as PV or solar heating need to be planned for now to ensure good orientation with the sun, etc.

2.2 Greywater Usage

We note that a large water attenuation tank is planned for one end of the site which will store water temporarily for discharge into an existing watercourse that currently overflows onto the lorry turning area on Manchester Road. This area already floods, is waterlogged throughout the year and requires regular clearance by Highways/KMC.

A better use of this stored water would be for greywater purposes such as WC flushing or garden watering.

2.3 Energy Performance

The Minimum Energy Efficiency Standards (MEES) come into force next year. There is no detail concerning the likely energy performance of the proposed dwellings on the site.

We have reviewed recently built properties by SB Homes on the Empire Works site and note that EPC information is generally 'TBC' which suggests it is of little interest to the developer as a selling point. Other properties at Old Bank Works that were only completed about 5 years ago are classed

as having an energy rating of only 68, which equates to band D. This rating falls below the minimum standard that the government is aiming for with all dwellings (existing and new) once energy improvement measures are introduced as part of the Greener Homes grant scheme.

We must therefore assume that the overall building standards in terms of energy efficiency will be of little importance apart from achieving the minimum requirements in force at the time.

As the UK and Kirklees MC have declared a 'Climate Emergency' with many areas wanting to become carbon neutral by 2030, it seems that the developers need to be coaxed into assisting us all to achieve this goal. It would be better if more of them could lead the way – see the climate innovation district in Leeds.

We are concerned that based on the minimal detail provided as part of this application that low energy measures are not significant in the design of the site and housing. We think that this is a serious omission and is incompatible with a carbon zero future.

2.4 Drainage from Lingards Road

Water run-off from Lingards Road has been allowed for in the proposed installation of land drains next to the retaining walls at the south end of the site and an attenuation tank.

However, we have observed that a few metres after the point where the camber on Lingards Road changes, (opposite Nos. 78 and 80), storm water enters the existing field.

At this point, the proposed surface water drain on the site has already ended and there is a real chance that the land drain will not actually collect the water that it is installed for. The following pictures indicate the volume of water that the tank will have to hold. These photographs were taken in 2020 when we had two such flooding events – these are not rare occurrences.



Illustration of typical winter storm water on Lingards Road in 2020

2.5 Crime Prevention

West Yorkshire Police have commented on the proposals and have concerns relating to overall site security which we share.

In particular West Yorkshire Police (WYP) recommend that shared access footpaths should not be placed at the rear of properties. Where unavoidable, the path access gate should be located near to the front building line.

The above advice does not seem to have been noted by the developer as the access path between the proposed dwellings that overlook existing houses on Manchester Road is only accessed remotely and out of sight of all residents.

Our objections are:

- The design fails to deliver sustainable buildings - especially in the light of the new Government 10 Point Plan. The proposed development does little to limit or control the use of energy or other resources and will become obsolete in less than 5 years
- The proposed development does virtually nothing to achieve Kirklees MC's vision of achieving a carbon neutral environment by 2038. The development is not sustainable.
- The lack of a robust and viable water management strategy especially to accommodate surface water from Lingards Road. The water collected in the proposed water attenuation tank is not utilised and is to be dumped into the existing inadequate surface drainage systems on Manchester Road. The proposed drainage works at the south end of the site do not fully protect the proposed or existing houses from flooding.
- The design increases the risk of crime - especially for existing properties on Manchester Road

Section 3.

Impact on character of local area

Relevant section of the Kirklees Local Plan are:

LP32 Landscape - protect and enhance the characteristics of the built, natural and historic environment

LP35 historic environment

In the Kirklees Local Plan Slaithwaite is included as one of the areas of “Rural Kirklees” and there are various descriptions of what this means including reference to the landscape and the style of buildings. Lingards Road itself is situated on the edge of Slaithwaite so is an even more rural part of rural Kirklees. As noted elsewhere, the proposed development site occupies an elevated position, directly on the fringe of open countryside and moorland. There is no boundary between the site and undeveloped open landscapes to the west.

As such it has characteristics such as:

- An elevated open aspect;
- Extensive and uninterrupted views of the valley below including fields, drystone walls, woodland, the river and canal corridors;
- Quiet surroundings and a peaceful environment;
- Public footpaths directly onto open countryside;
- Homes with a high degree of privacy, predominantly sited along the road in a linear manner;
- Homes with green space around;
- Narrow highways – Lingards Road is an old local route.

The proposed development consists of:

- Dense housing arranged along three cul-de-sacs with turning heads;
- Apartment blocks;
- Properties that are overlooked by existing houses due to difference in levels;
- Properties that overlook each other by both proximity and levels;
- Minimal green space surrounding properties;
- Inclusion of roof terraces as outdoor entertainment spaces;

The proposed development is quite starkly different to its immediate built environment in respect of characteristics.

The inclusion of apartment blocks is particularly out of character across the whole site but especially on the western edge where the site adjoins open countryside and in the vicinity of the listed building to the east. It suggests little regard for anything beyond the immediate site and a focus solely on the number of properties that can be included.

3.1 Green Spaces

The existing field and surrounding land is to be replaced with a housing development containing very little communal green areas.

The plans do show a small section of communal land at the eastern end of the site near the proposed flats, but in our view this is unlikely to be beneficial to many residents due to its non-central location.

Plans of the western end of the site do show some footpaths and trees following the route of the stream but this is not usable for group gatherings by the community and will only be a transit route, which actually exists as a footpath at the moment.

Apart from these quite small green areas, the proposed development will consist of mainly hard landscaped areas.

The Covid Emergency has demonstrated the value of green space for local people. For us on Lingards Road, the site is currently part of the overall visual amenity, the open landscape that is part of the surrounding hills that make this area unique and valuable.

3.2 Impact of the Buildings on the Surrounding Area

The development appears to make use of the terrain in such a way that does not take into account the location of existing buildings and assets such as listed buildings and other buildings that give character to this area.

In our view, where houses are positioned at the site perimeters, they overlook and are overbearing in relation to the existing dwellings.

Our Objections are:

- **The proposed development would be an insertion of an essentially urban design into an essentially rural location and does not respect the character of the local area**
- **The proposed development will dominate the landscape and be overbearing in relation to existing buildings such as the farm and listed buildings so that they are no longer a focal point of the area**
- **The proposed development permanently converts existing green space into an urban development when there are existing brown field spaces available in and around Slaithwaite**
- **The proposed development will have very little communal green space**

Section 4.0

Infrastructure, Highway Safety, Transport and Traffic

Relevant section of the Kirklees Local Plan are:

LP3 Location of new development

LP5 Masterplanning sites

LP7 Efficient and effective use of land and buildings

LP4 Deliver essential and desirable infrastructure

LP20 sustainable travel

LP21 Highways and access

LP22 Parking

LP23 Core walking and cycling network

LP47 Healthy, active and safe lifestyles

LP48 Community facilities and services (active transport options)

LP52 Protection and improvement of environmental quality - noise light and pollution

4.1 Lingards Road - poor existing infrastructure

Lingards Road is a narrow rural road with several blind bends along its length.

On the bottom section there is car parking on both sides of the road making it impossible for vehicles to pass.

On the upper section the narrowness of the road makes it impossible for 2 cars to pass easily at any point.

Lingards Road has ditch drainage on its upper sections: at times of heavy rain - frequent here - the stones from these ditches wash out down Lingards Road (for several hundred metres) - see attached photographs. Piles of these stones can be found all along the boundary of the proposed development site forming and reforming new water courses.

The drainage ditches on the upper part of Lingards Road have been so thoroughly scoured out by water that the road surface is currently (Dec 2020) collapsing into the holes beneath. It also means that water flows unabated off the fields and down the road at speed.

Regular gulleys begin along the road (south side only) below 'Top O the Hill'. These gulleys do not actually function as most of them along the full length of Lingards Road are blocked due to debris from the open ditches mentioned above and leaf rot.

Local councillors have been made well aware of all of these issues in formal correspondence - which can be supplied. These are not new concerns, but they become even more pressing given the proposed development.

The infrastructure of the road isn't good enough right now, nor is it well enough maintained to take an increase in traffic.



Illustration of drainage gulleys and water damaged tarmac on Lingards Road

4.2 Pollution

The 'Phase 1 Environmental Assessment' dated Dec. 2014, states that there have been no pollution incidents within 500m. This isn't true.

In May 2013 we had a sewer failure at the junction of Nields Road with Lingards Road which spread raw sewage all across Nields Road and down Lingards Road to its junction with Manchester Road. This will be logged on Yorkshire Water's records as we had to insist several times that the sewage be cleaned up. It took several days for Yorkshire Water to act. Kirklees councillors were involved at the time, also contacting Yorkshire Water and we can provide copies of this correspondence.

This is an example of a very serious pollution incident which for whatever reason hasn't been included in the environmental report. This contributes to a false overall impression that there are no infrastructure or pollution problems in the area which there quite clearly are.

Since the date of the environmental report (2014) there have been further numerous incidents where local drains have failed to cope with the amount of water flowing into them. Water has been photographed coming UP the roadside gulleys (these can be supplied). This has happened several times in 2020 alone and the issue has been raised with Kirklees councillors. This is a recurrent problem and needs to be addressed. The existing infrastructure is unable to cope without adding further pressure from any development. Pollution incidents happen here now - further ones are inevitable.

4.3 Diverted traffic and rat running on Lingards Road

Lingards Road is used by traffic avoiding the closures, roadworks and hold-ups on Varley Road and Chain Road - busy B roads (B6109 and B6107) immediately to the east and south.

In recent years we have seen several closures particularly on the B6109 severely impact Lingards Road with traffic coming through at speed and in volume.

Lingards Road has now become a route of choice for some drivers who want to avoid the junction of Varley Road B6109 with Manchester Road A62.

Lingards Road isn't the official diversion route noted on the Kirklees website which suggests that the council is well aware that it is unsuitable to safely accommodate the Varley Road traffic.

4.4 Road safety

We walk, run and cycle on Lingards Road and are acutely aware of accessibility and safety. In recent years with road closures and more regular traffic looking to save a few seconds at the B6109/A62 junction, the route has become increasingly more dangerous for walkers and cyclists. (We're not horse riders but we would anticipate they have experienced a similar impact). All available research on this topic confirms that when people feel safe, they will walk and cycle. Kirklees Cycling Campaign has been making this point to the Council for many years. The very latest Government policy statement (Government 10 Point Plan November 2020) says that the objective on cycling & walking (Point 5) is to "create more low-traffic neighbourhoods to stop rat-running and allow people to walk and cycle".

4.5 Impact on cycling

Lingards Road is a slightly less steep cycling route up and out of Slaithwaite to the south. Its rural nature also makes it a relatively safer option than the B6109. It is potentially an excellent, promotable cycle route. Kirklees Council could also give Lingards Road a 'quiet lanes' status to encourage it as a walking/cycling route and to make vehicle drivers aware that this is a preferred route for these activities. This would encourage more active forms of travel.

The gradient of Lingards Road makes for relatively slow cycling uphill. There are no safe places to pass a cyclist on either the upper nor the lower section of Lingards Road. This causes driver frustration and often dangerous attempts by drivers to overtake. We have had many firsthand experiences.

On the descent, which is quick, cyclists would not be visible to drivers exiting the proposed development until a collision was imminent - due to the sharpness of the bend, the proposed trees that will screen the site and a cyclist's position in the road.

Increased traffic volumes will make this situation worse and will not promote more active travel options locally. Lingards Road will become even more dangerous for walkers and cyclists than it is now.

4.6 Impact on walking

It's worth pointing out that the walking routes on the developer's plans from Lingards Road onto Manchester Road exist now - they don't represent 'new' walking routes.

The current residents of Lingards Road, Springfield Avenue, Nields Road and Yew Tree will not walk out of their way, i.e. back up the hill, to take advantage of the footpaths across the proposed development site. Any benefits would be solely for residents of the proposed development whose 'pavements' would connect with existing footpaths and roadways.



The application implies that the new infrastructure would be a benefit, an increase in facilities, an improved asset where it is nothing of the kind. This contributes to the misleading narrative about this proposed development.

Regarding pavements we have looked at those on the Empire Works development also by this builder. It's clear that from the width (and camber) of these pavements (see photo) that they aren't fit for the purpose of people walking. They aren't flat and they don't allow two people to pass safely without stepping into the road or onto private property. People with disabilities or mobility problems would find access impossible. The Empire Works development clearly prioritises driver access. Given the similar density and lack of space on the Lingards Road site, it's more than likely that the state of the walking areas will be similar and very safe to say that few people will choose walking as an option.

The photo of Empire Works (see above), incidentally, show how poor a finish there is to the road surface. It is formed of a patchwork of tarmac of different heights and textures, there are potholes and raised ironworks. A similar poor quality finish can be found along the Howgate Road walkway. It could be that these works will be completed but it is almost two years on from the completion of the latest building phase.

4.7 Pavement parking

There is some pavement parking at existing pinch points on Lingards Road making access for pedestrians problematic now. This will only increase if there is further development - particularly on pavements surrounding the proposed main access junction onto the site. This is an existing pinch point - as evidenced by road widths on drawings.

4.8 Pedestrian safety

At the very bottom of Lingards Road near the junction with Manchester Road (A62), there is a handrail but no safe pavement area on either side for walkers or runners.

This makes the walk down onto Manchester Road and its bus stops especially dangerous for anyone on foot.

There is also no lighting at the Lingards Road/Manchester Road junction which, particularly in the winter months, creates an extremely dark area, on a blind bend, leading directly from a major trunk road. Any street lighting nearby is obscured by the mature trees at this point. Many vehicles take this bend at speed. With no lighting and no safety of a pavement this is already a really dangerous place for any pedestrians to be even before the increased traffic along Lingards Road that the development will create.

Kirklees councillors have previously been made well aware of these concerns. Most recent correspondence on this issue was Nov 2019 and Feb 2020 (this can be supplied). These aren't new issues but remain unaddressed and will considerably worsen if the development goes ahead.

Our Objections are:

- **The proposed development will significantly worsen the road safety situation on Lingards Road and surrounding roads. Dangers will be increased and opportunities for more active forms of travel will be much reduced.**
- **There will be increased, enduring traffic along a road that already is narrow, has poor visibility and poor infrastructure.**
- **the addition of further demand onto an already poor infrastructure - especially regarding highway width (access), maintenance, drainage.**
- **Contrary to the claims made there is no evidence in the design of the development to suggest increased active travel opportunities. The record of this builder is to create 'drive-up' homes.**
- **Increased access problems for pedestrians due to parked vehicles.**

- **Lack of usable green space within the design of the proposed development and all the health benefits this brings**
- **Previous commitments on infrastructure contribution (Section 106) were immediately re-negotiated by the developer once planning consent was given**

SECTION 5.0

ECOLOGY, BIODIVERSITY & LOSS OF HABITAT

Relevant section of the Kirklees Local Plan are:

LP7 Efficient and effective use of land and buildings

LP30 Biodiversity and geodiversity,

LP31 Strategic green infrastructure network (River Colne corridor)

5.1 Loss of green space, habitat and biodiversity

In 2021, the loss of any green space should be regarded as a defeat for the planet and for the future of all of us.

That green spaces need to be protected - for all sort of reasons - is set out in Biodiversity Plans at both national and local level. Most recently these are strengthened by the UK Government policy commitment (Government 10 Point Plan November 2020) and by Kirklees Council in its declaration of a Climate Emergency (January 2019). The Kirklees declaration of a climate emergency is a positive step but policy and tangible action has to follow. Declaring a climate emergency and building on green land is incompatible.

Point 9 of the Government 10 Point Plan - "Protecting Our Natural Environment" confirms the Government's "commitment to protect and improve 30% of UK land by 2030" - a target campaigned for by many groups nationally.

The direction of policy is clear.

Surely the easiest way to protect and improve land is to preserve it as green space - and to then work to improve its biodiversity. The ecology report for this proposed development confirms that habitat will be lost - as do the Council's own officers and Natural England. The proposed development relies on prospective "off-site habitat enhancement measures" as compensatory. This is not like-for-like habitat.

We also cannot have any trust that the compensatory measures outlined in the biodiversity report will actually be delivered by SB Homes post development. Previous 'Off-Site Public Open Space' commitments required of SB Homes by Kirklees planners in respect of other local developments have not been honoured once planning consent was given. See Kirklees Councillors' comments regarding Empire Works:

<https://www.examinerlive.co.uk/news/west-yorkshire-news/sb-homes-slaithwaite-planning-row-9748510>

The actual record of this builder, and not only its self-publicity, needs to be factored in. The record suggests a net habitat loss.

Brownfield development

Both national and local policy encourages the use of brownfield sites for development. There are several such sites actually visible from Lingards Road. It makes no sense for green field sites to be used before the exploitation and development of brownfield sites. Once a green field has been concreted over, it cannot be recovered, it cannot be restored, its biodiversity cannot be improved.

Future enhancement of biodiversity and rewilding

Biodiversity improvement potential is also lost forever when any undeveloped space is lost. Wild areas - unlike concrete & stone - are amenable to future change and improvement. The ecological reports make no reference to the wealth of activity and research on 'rewilding' - improving and extending the potential for biodiversity. There are already very good examples of this in Kirklees - such as the Yorkshire Wildlife Trust site at Stirley Farm.

See also material on www.rewildingbritain.org.uk.

The ecological report confirms that the proposed site has been undeveloped since records began. The ecological report ignores the western edge of the proposed development site - it is omitted as a boundary in para 3.1.2. This is not surprising as the land adjacent to the site on the western edges is also completely undeveloped. It extends, without any man-made barrier to wildlife, across fields and several cloughs and woodland areas to Marsden. This is a substantial area of uninterrupted diverse green space. There are no barriers to any type of wildlife entering the proposed development site from any of these western edges. The assertion in the report that this site has 'only site' value (for example 5.2.2) is clearly wrong. Any type of wildlife but especially fauna can easily access this area to feed, breed and live - and they do. This makes this site valuable both now and on into the future. The very limited analysis and no references to the wild western boundary of the proposed site **severely undervalues** the biodiversity of the proposed development fields. The report is partial and inadequate - and it seriously under-represents the local area.

5.2 Wildlife records from Lingards Road

We have read the biodiversity reports for the proposed development site and can say that these don't truly reflect the extent of biodiversity on Lingards Road. We have lived here over 20 years and can confirm the presence of many additional species. We are just casual observers so we ourselves are likely to have under-recorded the true diversity. All the sightings noted have taken place directly from our property which is on Lingards Road - within a few metres of this proposed development site.

We started to make written records approximately 10 years ago, so our information is up to date when compared to the majority of those quoted in the ecology reports.

The diversity of wildlife here is immense and it should be protected. Wildlife is seasonal and does not perform for report writers on certain days.

The list attached as Appendix 1 confirms that we have been able to record over 40 different species of bird directly from the house. This is more than 3 times the number in the Middleton Bell ecological impact assessment (October 2020).

On this basis alone, the biodiversity report significantly underscores the habitat and misrepresents this area's value.

The reports make dismissive reference to the other types of life here for example bees, butterflies, moths, snails, beetles - of which there are many. Any Lingards Road resident who has rebuilt a dry-stone wall in the garden will have found toads. They can often also be found overwintering in the corners of garages and migrate over the road to the field (the proposed development area) and beyond in early spring, evidenced by some casualties found on Lingards Road.

Lingards Road has resident bats (we have a regular bat roost right here in our eaves) and little owls which simply wouldn't be here if the area wasn't rich in invertebrates. These forms of life get one line in the report (5.2.31). Yet they are the basic building blocks of the local ecosystem.

The SLR report (2015) also submitted as supporting information, refers to this area (front page) as Lingards Lane, it repeatedly confuses the Rivers Colne and Calder - the Calder is many miles distant. These consultants don't appear to be able to accurately locate themselves let alone any wildlife.

This report is also inaccurate, partial and misrepresents the biodiversity of this area. We highlighted its poor quality and lack of basic care and attention in 2015 - and do so again.

Refer to Appendix 1 - Mammals and birds - direct sightings on Lingards Road

Our objections are:

- **misrepresentation of the site as of poor value when it is a fundamental part of the local ecosystem)**

- the proposed use of green space at a very early stage in the plan when there is more than enough time for other brownfield sites in the local area to be utilised first
- loss of habitat for wildlife that cannot ever be replaced
- reduction in biodiversity in the local area
- loss of a greenfield site that both borders open countryside and lies within 100m of the valued River Colne corridor
- Ignoring inconvenient truths like the open, wild western edges of the proposed development site.
- Underscoring of the biodiversity of the site in the ecological reports - The Kirklees Council Ecology Unit's Consultation Response does not support the development.
- Loss of a green space as an amenity - for wildlife, the ecology of the area and for people.
- Some off-site green planting of trees does not provide like-for-like replacement for the loss of unique habitat on the site and should be retained in this location.
- Previous commitments to provide Off-Site Public Open Spaces were not delivered by the developer

Appendix 1 - Mammals and birds - direct sightings on Lingards Road

Mammals

hedgehogs (photograph available)

weasels

deer (photograph available)

hares

rabbits

bats (annual roost)

foxes

squirrels

moles

field mice

Birds

heron

partridge - grey legged

partridge - red legged

pheasant

redwing

kestrel

buzzard

sparrow-hawk (photograph available)

little owl

duncock

robin

wren

house sparrow

collared dove

rock dove

wood pigeon

wheatear

greenfinch

goldfinch

mistle thrush

song thrush

fieldfare

redwing

starling

skylark

house martin

swift

swallow

great spotted woodpecker

blue tit

coal tit

great tit

long tailed tit

blackbird

pied wagtail

jay
crow
jackdaw
magpie
lapwing
linnet
gulls