



***Jayne Brearley & Co***  
**SOLICITORS**

Our ref: JEB/NDAL

8<sup>th</sup> April 2022

Secretary of State for Transport,  
c/o The National Transport Casework Team,  
Department for Transport,  
Tyneside House,  
Skinnerburn Road,  
Newcastle Business Park,  
NEWCASTLE UPON TYNE.  
NE4 7AR

Dear Sirs,

### **SECOND LETTER OF OBJECTION**

**Re: The Borough Council of Calderdale (Elland Station and West Vale Access Package) (West Yorkshire Plus Transport Fund, Transforming Cities Fund)(Side Roads) Order 2022 ("Side Roads Order")**

**The Borough Council of Calderdale (Elland Station and West Vale Access Package) (West Yorkshire Plus Transport Fund, Transforming Cities Fund) Compulsory Purchase Order 2022 ("the CPO")**

Further to my letter of yesterday's date, my client, North Dean Automotive Limited, has asked me to also make the additional objections on their behalf:

- The major work with regards to the construction of the scheme will cause major disruption and loss to their business
- The proposed planning permission - *planning has previously been granted so there is no reason why the current suggested scheme should not be approved* - would need to be implemented using the current access.

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- The original plan proposed by Calderdale MBC was to use the entrance to the rugby club and this was on their website for approximately 2 years. My client was informed by James Driver from Calderdale MBC that it had been disregarded due to blind spots and lines of sight – obviously the same would apply to my client and its business users.
- The proposed cycleway will pass through a flood plain where earth bankings have been built up and which could, presumably give way.

As per previous, if you require any further information at this stage, please do let me know.

Kind Regards.

Yours faithfully,

*J. Brearley*

**Jayne E. Brearley**  
SOLICITOR & BARRISTER (NP)