
Introduction

CPRE welcomes the opportunity to comment on the Initial Draft Local Plan. At this stage we have not commented in detail on the whole draft, nor on specific sites; but have instead highlighted some principal, strategic concerns that we hope the Council will take into account in preparing the Publication Draft. We will address more detailed points at that stage.

We also broadly endorse the representations by Calderdale Friends of the Earth, which address a range of matters in greater detail, particularly relating to transport.

General Comments: CPRE's agenda for Local Plans

CPRE has identified the features it considers Local Plans should generally contain, and this is what we will be testing the Calderdale Plan against.

The purpose of a Local Plan is to deliver sustainable development. Providing sites for housing and employment development is therefore not the end in itself, but is a key mechanism for delivering sustainable development, so long as it results in the right development in the right places at the right times.

CPRE wants to see Local Plans take a positive, plan-led, place-making approach. In particular this means that Local Plans should include the following features.

1. Local Plans should support sustainable economic development. With this in mind, the target amounts of employment and housing development should be informed by realistic expectations of the economic growth that can be achieved, and of the availability of a relevant workforce. For growth to deliver sustainable development, Plans should prioritise reducing local worklessness and out-commuting as the preferred sources of additional workforce. Where workforce growth is considered to depend on in-migration, that in-migration must be explicitly planned in transparent collaboration with neighbouring authorities, so that the cross-boundary impacts can fully inform all Local Plans and avoid wasteful double-counting.
2. Local Plans should explicitly state that delivering new housing is only sustainable if it provides homes of a type, location and cost that are appropriate to the people who need to be housed. With this in mind, the Objectively Assessed Housing Needs (OAHN) should be clearly segmented by the types and tenures needed within each housing market area, or preferably within each settlement. The distribution of the housing requirement, site allocations, and the types of development permitted on windfall sites, should all be informed by that segmented structure. (We have yet to analyse the draft Plan in the light of the new CLG guidance on OAHN).
3. All site allocations should be accompanied by a development brief that indicates the housing quantity mix, type, tenure and density that should be expected from the site; and it should be clear that planning permissions on those sites would be conditional on meeting that brief. This should also set out the intended timing and rate of build-out,

such that the Local Plan cannot be held responsible for subsequent delays in delivery of development that result from factors beyond its control.

4. For larger, strategic development sites:
 - sites should only be allocated where they can be readily accessed by rail or light rapid transit, offering opportunities for sustainable, high density, mixed-use neighbourhoods;
 - the general masterplan should be developed in full consultation with adjacent communities;
 - the structures for a Neighbourhood Plan should be automatically put in place for the new community, if it is a self-contained new settlement, or for the host community in the case of settlement extensions, so that the evolving community has a guaranteed stake in its development.
 - the default allocation should be for mixed uses, rather than single uses, to lay the foundations for place-making;
 - the standards and techniques of construction, energy/carbon performance, contribution to housing mix, type and tenure, and the mix of other uses needed for place-making, should evolve over the life of the Local Plan and beyond;
 - allocations should therefore be divided into multiple, smaller development sites, within the masterplan framework, with detailed planning permissions for each parcel being granted and conditioned appropriately as the plan period progresses.

In our view this approach to larger sites should also enable faster overall housing delivery rates than may otherwise be achieved, by diversifying the market.

5. Local Plans usually have a suite of place-shaping policies, which include settlement hierarchies, sub-area policies, built-up area boundaries, greenspaces, countryside policies and, in some cases, strategic gaps and Green Belt. Local Plans should recognize from the outset that this whole suite of policies is potentially vulnerable to fluctuations in the five-year land supply. To reduce this vulnerability, they should explicitly state:
 - The range of sustainable development functions that are embedded in the suite of place-shaping policies;
 - The relative weight that should be afforded to those sustainable development functions compared to the weight given to maintaining a five-year land supply;
 - The mechanisms that will be used to address fluctuations in land supply and that will therefore prevent place-shaping policies from being inappropriately rendered out-of-date.
6. Safeguarded land is habitually undermined by planning applications coming forward for those sites during the plan period in instances where the local authority cannot demonstrate a 5-year land supply. This makes Local Plan policies for safeguarding land ineffective. To remedy this, Local Plans should clearly state the function that safeguarded land is intended to provide and the consequences of developing it during the plan period. In particular, this will include a statement of how the settlement hierarchy, infrastructure provision and distribution of development are pertinent to the

plan period and cannot in themselves be rendered out-of-date by lack of a 5-year land supply.

7. NPPF Para 81 requires local authorities to plan positively for the enhancement of land within Green Belt. In our view, this requirement should be extended land designated as non-Green Belt countryside, strategic gaps and urban greenspaces. To support this, Local Plans should include, or be supplemented by, enhancement action plans for the land within these designations, which would then be material considerations in determining planning applications. Any site proposed allocations for development that require the removal of land from Green Belt, strategic gaps, urban greenspaces or countryside policy areas must then take account of their potential to harm, or benefit, this enhancement action plan.
8. The climate change policies in a Local Plan should clearly articulate how the Plan will contribute to the local authority meeting its obligations under the Climate Change Act 2008. The RTPI publication *Planning for climate change - guidance for local authorities* (April 2012) provides a good starting point for this. In particular, there is ever-increasing evidence that link-road and motorway-based development corridor models do not deliver significant economic benefits, but have many shortcomings in terms of poor place-making, wide-scale landscape impact, traffic generation and associated air and noise pollution and carbon emissions. We would therefore expect Local Plans to move away from allocating land for development based on link roads and motorway junctions.

Overall Strategy; Scale and Distribution of Growth

Policy SD2

This is an important policy that we fully support; but it is unclear how it is to be monitored.

Para 6.8

It is true that the 5-year supply plus buffer requirements don't increase the housing requirement, but they can increase the total land supply requirements beyond the bounds of realism, and distort the pattern of development. This is particular of concern given the plan's dependence on large strategic sites. Unless the rate at which those sites contribute to land supply are pre-determined, then there is a strong risk that any delays in those sites being developed will lead to the plan under-performing, and housing supply policies being considered out-of-date. That is why it is very important not to over-state the housing requirement, so as not to create undue risks to the land supply requirements.

Para 6.9

The Housing Trajectory should only be based on the anticipate flow of completions. Otherwise there is no relationship between the trajectory and the monitoring of performance that informs the ongoing calculation of 5-year land supply. A trajectory

based only on the anticipated availability and build rates *per site* in the SHLAA only provides a hypothetical rate at which sites may become available for development, rather than a profile of the rate at which housing will be delivered. Annual completion rates, on the other hand, take into account the rate of growth in the market for housing *across all sites* that can be realistically anticipated.

Table 6.6

The draft plan envisages employment growth of 5,955 jobs and housing growth of 16,871 dwellings, ie 2.83 homes per job. By contrast, the Barnsley Local Plan (Publication Version) envisages 33,000 jobs and 20,900 homes: 0.63 homes per job. Barnsley MBC justifies this on the basis that job density in the Borough is low, and therefore it must plan, relatively speaking, for more jobs than homes. To do otherwise would not address worklessness and would induce increased out-commuting. Applying this logic to Calderdale suggests that job density must be significantly higher than Barnsley's, and that it is necessary to plan for more homes than jobs in order to reduce in-commuting. The Employment Land Study (August 2017) shows that Calderdale does have a relatively high job density, and while there is a small net out-flow of commuters, gross commuting levels are high. Therefore, if the Calderdale Plan is to meet both its employment aspirations and its aims to reduce transport-related carbon emissions, then there must be convincing evidence that housebuilding will significantly reduce in-commuting, rather than increase out-commuting. We have not seen any such evidence.

Tables 6.8 to 6.13

We are very concerned that the strategy described in these tables is not credible. Table 6.8 shows brownfield land to have been a reliable and dominant source of housing land, and yet the process of considering and allocating future sites is heavily dominated by greenfield and Green Belt sites. We have analysed this data alongside the SHLAA (2014) and our Figures 1 and 2 (page 5) illustrate our concerns.

Figure 1 shows that overall housebuilding has been in gradual decline over a 20 year period, with brownfield completions also in slight decline; whilst the housebuilding target has accelerated noticeably over the same period. The linear trendlines show that the pre-recessionary peak in completions did not have a dramatic effect on the overall trend.

Figure 2 shows what happens if the SHLAA Housing Trajectory is used as a proxy for housebuilding rates progressing through the plan period. Brownfield sites continue to gradually decline as a source of supply, but it is clear that the only way to meet the long-term upward trend in the housing target is for the average rate of housebuilding to accelerate very rapidly.

Figure 1

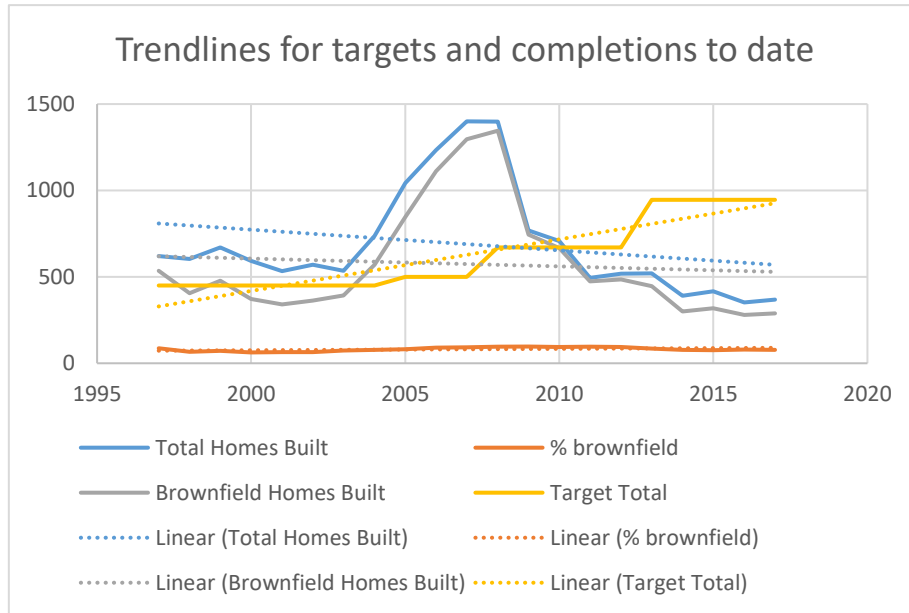
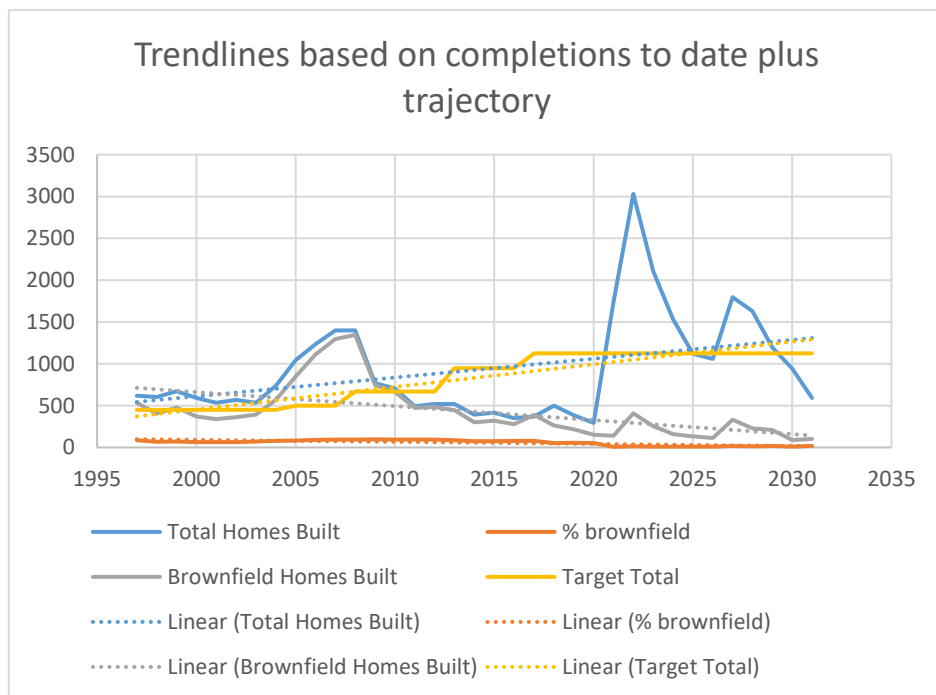


Figure 2



Comparing Figures 1 and 2, we can draw three notable conclusions:

- the upward trend in housing target during the past 20 years has not produced an upward trend in completions over the same period;
- the Draft Plan is heavily reliant on a dramatic increase in land supply as the principal mechanism to deliver growth in completions;
- brownfield sites have been a consistent and reliable source of supply historically, yet only form a very small proportion of SHLAA sites for the plan period.

These conclusions lead us to the view that the Draft Plan is not realistic; principally because it relies on the expectation that a sudden influx of additional, greenfield sites into the land supply will result in rapid acceleration in housebuilding to reverse long-term trends. We do not see meaningful evidence that this can be achieved.

Garden Suburbs and other Green Belt allocations

Para 6.49

This para sets out a justification for allocating some sites in more strongly-performing Green Belt parcels; but without site-by-site analysis is not apparent what the scale of this impact is on the purposes of the Green Belt. Considering that Table 6.13 shows 69% of all draft allocations to be in the Green Belt. In the light of our comments above, any justification of exceptional circumstances for taking land out of the Green belt must show, on the one hand, that doing so will realistically and sustainably deliver the intended scale of development; and on the other hand, that the degree of impact on the purposes of the Green Belt will not be unacceptable. In our view this has not been properly evidenced.

Para 6.52

Essentially this sets out a case for Northowram and Shelf being subsumed within an urban extension, but also states that the impacts of such a proposal have not yet been fully assessed. This appears to predicate the overall distribution of growth within Calderdale on a presumption that the impacts on Northowram and Shelf can be resolved.

Para 6.57

Considering the excellent development tests set out in policy SD2, and Calderdale's greenhouse gas reduction targets, it is counter-intuitive that such a significant proportion of growth would be focused on 'Garden Suburbs' that depend on 'enhanced infrastructure provision' and are accompanied by a forecast 'increase in car growth'. Urban extensions and new settlements can only be considered sustainable if they have exceptional levels of public transport accessibility - in which case they would also be expected to deliver high residential densities and a mix of uses. In this context, the Garden Suburb proposals appear recklessly unsustainable.

Continuing with our concerns about residential densities, there is an ever-growing body of evidence to show how important it is that neighbourhoods are built to higher densities. The Commission for Architecture & the Built Environment (CABE) reported in 2005 that higher densities make better neighbourhoods, because:

- much of the more desirable housing in urban areas is of a higher density design;

- higher density housing in existing urban areas creates vibrant, successful neighbourhoods, and the number and variety of people who live there support local shops, transport and community facilities;
- higher density neighbourhoods do not mean all higher density housing is the same (a combination of housing types allows for different designs at different times in a person’s or a family’s life);
- higher density housing allows for private outdoor spaces and for shared spaces (such as parks) and shared facilities.

The CABE report (*Better Neighbourhoods - Making Higher Densities Work*, 2005) suggested that a ‘sustainable urban density’ should be 69 dpha, as this supports both vibrant neighbourhoods with local shops and parks, plus significant benefits such as viable buses and trams. By contrast, the majority of new-build housing only achieves around 30 dpha, which is the proposed minimum density in the Calderdale Plan policy HS2. We believe this is wasteful and unsustainable, and doesn’t make for good places to live.

We recommend that in inner urban areas these should be at least 70 dpha; and in other areas at least 45 dpha. Sites being proposed for new development should be assessed for their capacity and suitability to provide increased residential density for the neighbourhood.

This is of increased importance when a Local Plan is making a case for deleting land from the Green Belt. Any such changes must result in genuinely sustainable development, and must make efficient use of land. We have analysed the proposed housing sites that would come from the Green Belt, comparing the proposed densities on each site with our recommended minimum density of 45dpha.

Figure 3

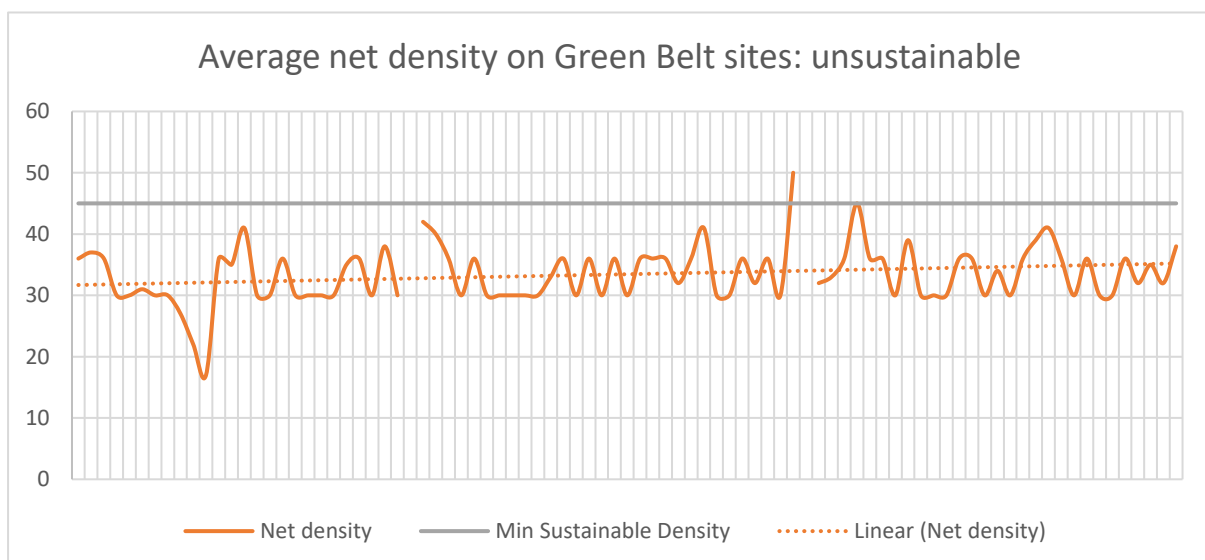
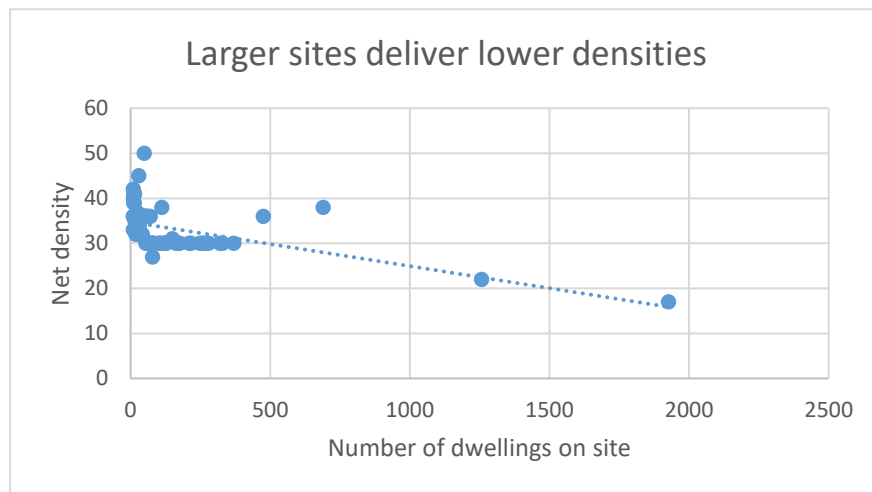


Figure 3 shows that the average density on ex-Green Belt sites would be 33 dhpa; which in our view indicates that the general effect of the Green Belt deletions would be to generate unsustainable forms of development, in terms of place-making and travel patterns. More worrying still, Figure 4 shows that, generally speaking, higher densities are only being achieved on small sites, which the largest sites - where development could offer more strategic possibilities for sustainable outcomes - are achieving the lowest densities.

Figure 4



Climate Change

It is very encouraging to see in - Table 10.1 - direct inclusion of Calderdale’s targets for greenhouse gas reduction. Policy CC1 and Table 10.2 establish the scope of the Plan’s climate change response and how it will be monitored. In particular, with reference to this, we would note:

Policy IM4 should make specific reference to the need for ‘Garden Suburbs’ and any other large developments, not merely to be accompanied by a travel plan, but to form part of a strategic approach to sustainable travel in Calderdale;

In the light of the excellent information provided in Table 17.1, Policy BT1 should be strengthened to make zero-carbon standards mandatory for all new developments in Calderdale. The authority’s carbon targets and its obligations under the Climate Change Act 2008 create the justification for going beyond national requirements in this regard.