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Introduction

Please note that it was our intention to divide up this document and submit it in relevant sections using the representation form, but having downloaded the form we found that key entry fields were locked. Given that the representation system is in any case not well-suited to comments that develop a narrative and contain figures and tables, we have therefore reverted to submitting full documents. These are structured as carefully as possible to enable you to use them.

This document is our core evidence paper. We also submit two other documents:

- One representation form to provide our details for your database;
- A supplementary evidence paper explaining our position that the Publication Draft Plan should be additionally assessed against NPPF 2018.

It is our view that the Publication Draft is not positively prepared to deliver sustainable development. It is not justified by the most appropriate and up-to-date evidence of development needs. And it will not be effective in delivering sustainable development, due to fundamental internal contradictions between the scale and distribution of development and other key policies in the Plan. This evidence paper explains our position on these points, and we conclude that very substantial modifications will be needed to make the Plan sound.

2. Spatial Portrait

It is important not to overlook this section of the Plan, as it contains a number of clues to the spatial interventions we should expect to see in the Plan.

2.11 Para 2.11 recognises that the Calderdale landscape “greatly constrains development potential within the Borough and limits the options for dealing with growth”.

2.29, 2.35 and Table 3.2 Paras 2.29, 2.35 and Table 3.2 illustrate the baseline situation in terms of travel patterns, particularly in terms of car dependency (64% of trips and 78% of distance travelled). If key sustainability objectives are to be achieved then the Plan must contain spatial interventions that reduce car dependency.

In that context it is difficult to see how a proposed additional M62 junction 24A is justified - especially given the established evidence that new and upgraded road capacity produces only a temporary relief from congestion, and quickly induces additional traffic.

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2.42 to 2.62	<p>Paras 2.42 to 2.62 provide a badly structured and almost impenetrable presentation of the demographic and household growth situation. National statistics are jumbled with local ones, and nearly every piece of data quoted has a different base-date, period or end-date. There also appear to be a number of mathematical anomalies. This means that it is virtually impossible for the reader to understand the specific growth challenges, and therefore to assess how well the Plan addresses them.</p>
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In an attempt to cut through these opaque statistics, we have produced a simple graphic taking key information about workforce and demographics from Chapter 2, and analysed the implications for policy interventions.

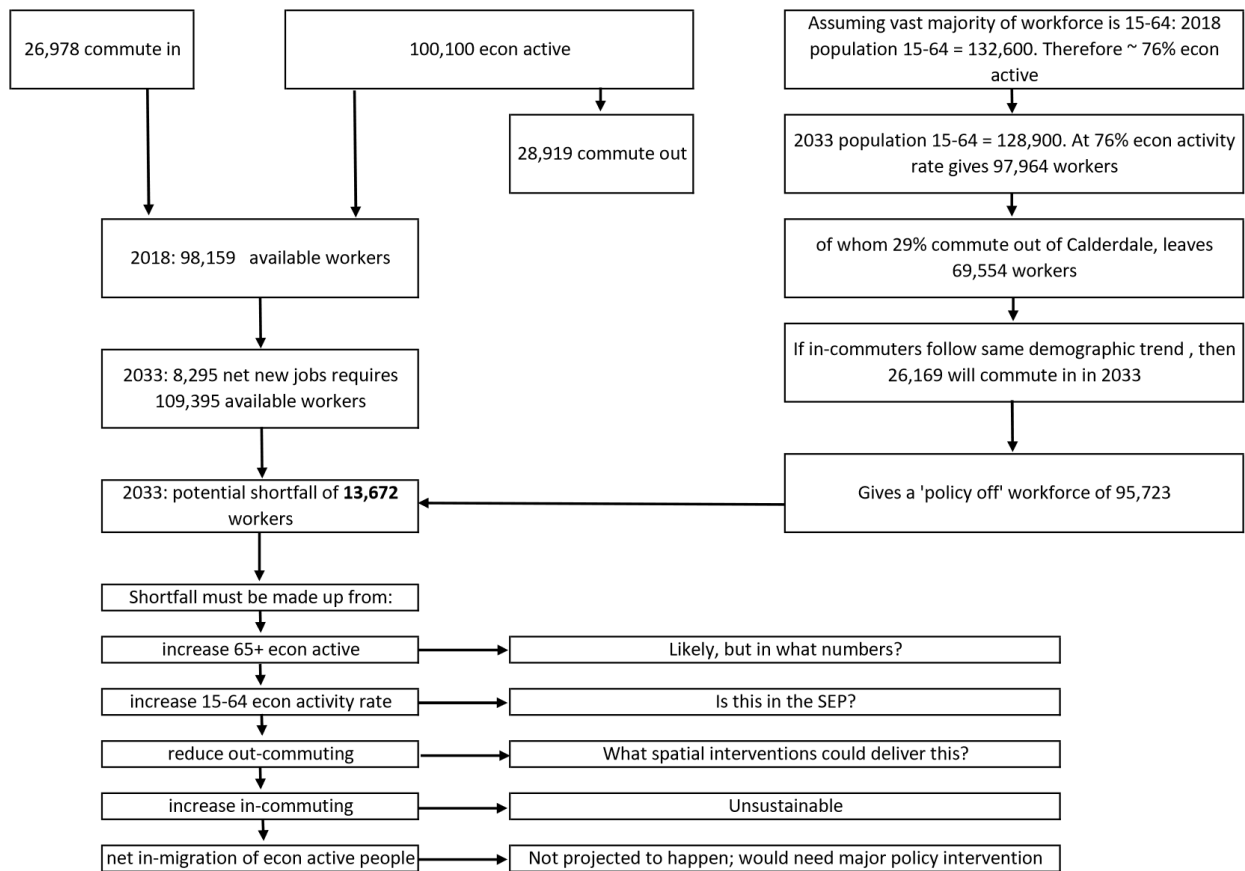
We begin with a 'policy-off' baseline which assumes that:

- The demographic changes will be as projected;
- The commuting ratios remain the same over the plan period;
- The vast majority of economically active people in 2018 are in the 15-64 age range, and that this remains the case over the plan period.

Applying the net job growth target of 8,295, we find that the 'policy-off' baseline leaves a shortfall of available workforce for Calderdale of over 13,500 people by the end of the plan period. This represents a huge demographic challenge to the realism of the job growth target.

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Figure 1: Workforce shortage implied by the Spatial Portrait



2.42 to 2.62 cont'd Our analysis therefore illustrates that either the job growth target is wildly ambitious, or that a very clear and structured package of demographic and spatial interventions is needed to make up the shortfall in workforce. The more the labour supply is dependent on increased in-commuting, the more unsustainable it is and the greater the employment strategy is at risk from competing jobs in nearby authorities.

Clearly, significantly increasing economic activity rates across all age ranges should be a socio-economic priority, but there is limited scope for the Local Plan to influence this. The possible spatial interventions are therefore limited to

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reducing out-commuting, and encouraging a net in-migration of economically active people - and /or reducing the job growth target.

2.42 to 2.62 cont'd	In theory, providing additional housing suitable for people wishing to move to Calderdale for work could help to make up the shortfall, but this carries the crucial risk that if the job growth does not happen at the right time and place relative to the housing, significant increases in out-commuting are likely, meaning that new housing provision will not, in reality, meet the needs of people in Calderdale.
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In our view, the overall spatial approach in the Plan must be considered unsound because it has not been properly justified by the evidence as summarised in Chapter 2. In particular, there is no discernible rationale to connect the projected demographic changes with the Plan's job growth target, nor to set out how spatial and policy interventions may be intending to produce different outcomes compared to those foreseen in the Spatial Portrait. Without this, it is impossible to assess what the Plan is aiming to deliver, and why, other than two apparently disconnected targets, one for housing growth and one for job growth.

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4. **Chapter 4: Objectives**

4.8, S02, S04, S07 In principle, all the Strategic Objectives are laudable and worthy of support. The difficulty arises in monitoring the progress being made against those objectives, and establishing the effectiveness of Local Plan policies in securing that progress. In particular:

Para 4.8 and S02 place an responsibility on the Plan to reduce greenhouse gas emissions and address the causes of climate change, and this follows through into Policy CC1. However, the two most significant interventions to deliver that objective would be reducing energy consumption in the existing building stock, and reducing total road traffic by distance travelled. Since the Plan does not have policies that would implement either of those outcomes, and doesn't have its own carbon reduction target, then the net outcome of the Plan is likely to be to increase carbon emissions through the additional road traffic associated with new development.

S04 aims for a *'range of good quality dwellings of varying types, sizes and prices in sustainable locations utilising sustainable building methods and maximising the use of brownfield land'* ; yet the effectiveness of Policy HS3 in securing the right housing mix is likely to be compromised by viability arguments on a scheme-by-scheme basis; and the Plan has no policy for maximum the use of brownfield land, largely ruling it out as a source of land supply. Nor is there any basis provided, beyond the Building Regulations, with which to implement Policy SD2 in terms of requiring sustainable construction methods.

S07 seeks a transport system which reduces car dependency, yet substantial chunks of the housing allocations are on sites for which the car will inevitably be the principal mode of travel. Considering the existing, high levels of car dependence, the Plan needs to be making spatial interventions that can effect change in existing travel patterns; ie new development should reduce car dependence in existing development. No solution is offered to achieve this.

We must question the soundness of these objectives, however much we welcome their intent, if there are no means to ensure or monitor their effectiveness.

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6.	<u>Chapter 6: Planning for Growth</u>
6.2, Table 6.1	<p data-bbox="336 568 636 602">Para 6.2 and Table 6.1</p> <p data-bbox="336 627 1398 806">Whilst we accept that the Government’s standard methodology limits the scope for us to consider alternative OAN figures, it does not necessarily follow that Calderdale should plan to meet this OAN in full. Para 47 of NPPF2012 requires Local Plans to plan to meet OAN in full, ‘as far as is consistent with the policies set out in this framework’.</p> <p data-bbox="336 831 1417 940">In our view there are four significant elements of NPPF2012 that are pertinent to considering whether it would be appropriate for Calderdale not to meet its OAN in full. (NPPF2012 paras in italics.)</p> <p data-bbox="336 965 1378 1070"><i>Para 34: Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.</i></p> <p data-bbox="336 1095 1425 1348">The principal strategic sites proposed in the Plan are not well-served by public transport, and are significantly more accessible to Halifax, Bradford and Leeds by car than by public transport, in terms of journey times. This situation has arisen, at least in part, due to the constraints upon development site choice and suitability closer to central Halifax and to railway stations. Consequently the strategic sites chosen might be seen as the ‘least bad’ options, rather than as positive options from a sustainability perspective.</p> <p data-bbox="336 1373 1394 1478"><i>37: Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.</i></p> <p data-bbox="336 1503 1430 1682">The pattern of new development is heavily skewed towards the east of Brighouse, and represents a significant departure from the existing settlement hierarchy; so it is unclear how this will help the balance of land uses across the Borough. Again, this implies that allocations have been selected mainly on the basis of their availability and developability, rather than on the sustainability of the outcome.</p> <p data-bbox="336 1706 1406 1814"><i>84: When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development.</i></p> <p data-bbox="336 1839 1398 1980">CPRE does not rule out Green Belt change. Rather it takes the view that the result of a Green Belt change should be demonstrably more sustainable than could otherwise be achieved. The Plan should be clear about the sustainability benefits that the proposed Green Belt changes will enable, and how disbenefits</p>

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will be mitigated, with a net beneficial outcome. Para 84 supports this; and it has not been adequately demonstrated.

152: Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate.

The proposed spatial pattern of growth has been informed by the physical constraints upon development in the west of the Borough, and in that sense the chosen option is simply the least constrained. However, net gains for all three dimensions of sustainable development have not been shown. Economic outcomes may be limited by relative constraint to growth in and around Halifax. Social outcomes may be limited by the relatively poor access to public transport, and the relative car-dependence, of the strategic sites, and by loss of access to nature and recreation in those areas. And environmental outcomes may be limited by road traffic growth, loss of openness and countryside, and reduction in the re-use of brownfield land.

Therefore there are substantial risks of net negative outcomes for the people and the environment in Calderdale. These risks should be carefully weighed against the aim of meeting OAN in full; and in our view that evaluation has not be adequately undertaken or presented...

6.2,
Table
6.1
cont'd

These concerns mesh with our earlier analysis of the mismatch between the housing requirement and the job growth target. The demographic changes outlined in Chapter 2 suggest that, without very significant policy interventions, mainly operating at a City Region or sub-national level, it will not be possible to supply a workforce for the envisaged job growth. It is possible that a substantial regeneration programme for central Halifax, with higher-density living and mixed-use remodelling of some areas, could attract an increased workforce; but the Plan does not propose that. In the context of a population that is dramatically ageing, and with the 2016 projections showing a stagnation in overall population growth, there is nothing in the Plan to suggest that the job growth can be supported by labour supply.

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6.2, Table 6.1 cont'd	Consequently, the focus of the housing needs that must be met in Calderdale during the plan period must be focused on the types of households we know will be needed. If the OAN figure of 840 is accepted, then we can see that it breaks down into four overlapping segments of need:
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- Affordable homes (182)
- Homes suitable for one-person households (market and affordable)
- Homes suitable for over 65s (market and affordable, one-person and family)
- Other homes needed to meet specific needs and to update/complement existing stock.

In our view, if there is convincing evidence that these four types of needs can be met, then the societal benefits of meeting those needs could be argued to justify a degree of environmental impact; though still within the context that net sustainability gains should be the starting point. On the other hand, if specific housing needs remain subsumed within a general numerical target, dependent on the unquantified approach in Policy HS3 to determine the mix on a scheme-by-scheme basis, then this does not amount to meeting objectively assessed needs; and because the benefits of doing so are compromised, then there is no justification for environmental impacts, and no exceptional circumstances for Green Belt change.

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SD3	Policy SD3 and Housing Trajectory
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As set out above, our position is that the housing requirement might be quantitatively sound, but only if the requirement is segmented to give much greater confidence that the right types of homes will be built to meet genuine needs. Building the wrong types of housing would amount to a failure of the Plan, and therefore without segmentation of the requirement (as per our para XX) the Plan should be considered ineffective and not positively prepared.

We understand that historical success in delivering a high proportion of new development on brownfield sites might lead to a reduction in future brownfield supply; and we also acknowledge that a proportion of recent housebuilding has been on former employment allocations. Some reduction in brownfield supply may therefore be expected. However, we have not seen convincing evidence that the ongoing supply of brownfield sites has been exhausted to the extent that no new allocations would be made on brownfield sites.

Our Figure 2 below looks at housing targets and completions over the past 20 years. What we see is that whilst the target has progressively stepped up, the build-rate has tended gradually downwards, even allowing for the pre-recession peak.

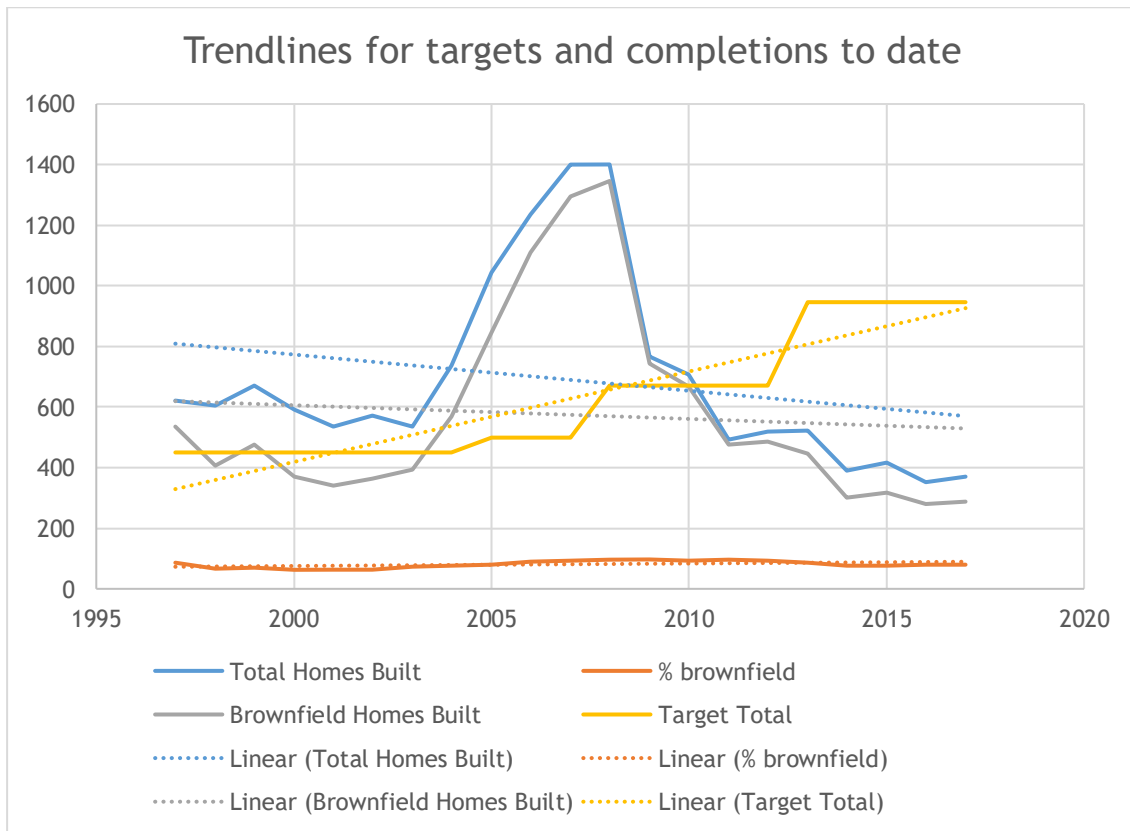
Over that time the large majority of housebuilding was on brownfield sites, and when evened out over the 20 year period it suggests a relatively stable supply of around 500 dwellings per year from brownfield sites. We have not analysed the split between allocations and windfalls within this brownfield supply. Even if the most recent brownfield completion rate of around 300 dwellings per year is taken as indicative of the longer term position, it is difficult to accept the Plan's proposition that new allocations of brownfield land cannot be envisaged within the plan period.

In the light of NPPF2018's renewed emphasis on brownfield sites, and the Plan's Strategic Objective SO4 to maximise the use of brownfield land, we consider that the evidence for the future supply and viability of brownfield sites must be re-examined.

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SD3 cont'd

Figure 2: 20-year historical trend in targets and completions

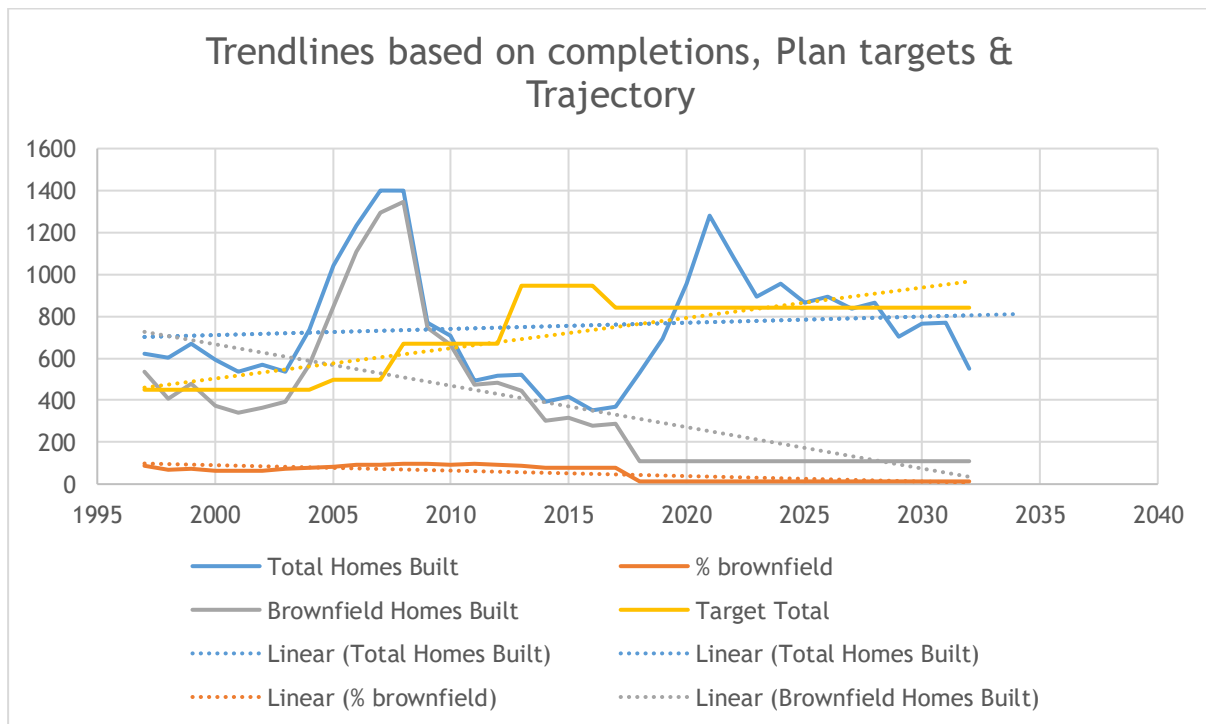


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SD3 cont'd Our Figure 3 adds the proposed housing trajectory onto the historical trend, to enable us to examine its realism. This shows:

- The extent of the sudden drop in use of brownfield sites, which cannot be said to be consistent with S04;
- The expectation of a rapid increase in housebuilding immediately upon adoption of the Plan.

Figure 3: Historical trend and Plan Housing Trajectory together



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SD3 cont'd It is of course correct that adoption of the Plan will result in a rapid acceleration of available land supply, as new allocations come on-stream; but it is inconceivable that housebuilding (starts and completions) will rise at anywhere near that rate. This presents significant problems:

It depends on a rate of housing market growth equivalent to the fastest part of the boom in the early 2000s (unless a very high proportion of new housing was for social rent);

If such rapid market growth could be achieved it would be very likely to create financial instability, leading to problems such as negative equity;

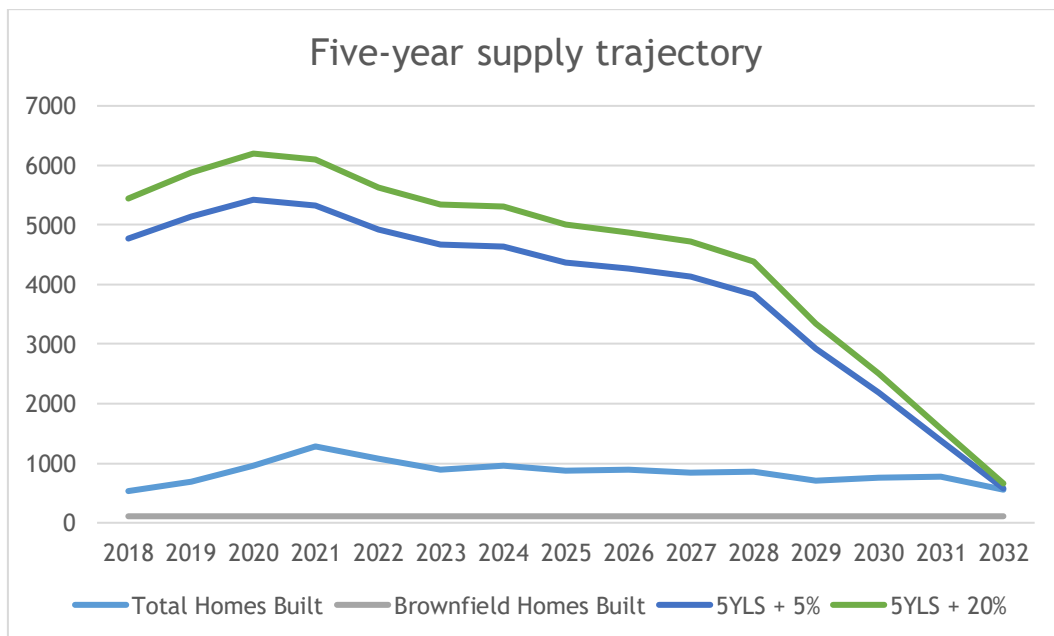
If it is not achieved, then the Local Plan is likely to fail against the new Housing Delivery Tests, causing the Plan to be rendered out-of-date almost as soon as it is adopted.

This deeply unrealistic trajectory sets up a 'lose-lose' situation for the Local Plan, and cannot therefore be sound. It is also self-evident that trying to secure very rapid increases in build-rates reduces the ability of the flow of brownfield and windfall sites to contribute to land supply. Consequently we may conclude that it is haste, rather than housing need, that creates pressure for large allocations of greenfield land, including Green Belt change.

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6.9, Table 6.4 **Para 6.9 and Table 6.4 Five Year Supply**
 Figure 4 below compares the rolling 5-year supply requirement with the proposed housing trajectory and the trajectory for housing on brownfield sites.

Figure 4: Five-year supply trajectory with brownfield component



Our figure 4 highlights a severe problem with the way the 5-year supply is presented in the draft Plan.

Table 6.4 presents a one-year snapshot of the 5-year supply in 2018, but in fact over the subsequent two years the supply would need to continue increasing, peaking at 6,200 in 2020. The trajectory expects 1,759 dwellings to be completed by the end of 2019/20, and at that point sites for a further 6,200 need to be in the 5-year supply. That means that almost 8,000 dwellings-worth of the entire plan period’s sites would have to be within the five-year supply by 2020, ie developable by 2025. In other words, the five-year supply requirements cause any sites that could only come on-stream after 2025 to be rejected as site allocations, even though they might be capable of delivering from 2026 onwards.

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6.9, Table 6.4 cont'd	<p>This creates a huge disincentive to the Council against making any effort to generate interest in developing brownfield sites, because the time to generate interest and bring a site to market will almost inevitably extend beyond 2025. That in turn puts the Plan at odds with para 119 of NPPF2018: <i>“Local Planning Authorities...should take a pro-active role in identifying and helping to bring forward [brownfield land].”</i></p> <p>This also poses a future risk, that the ongoing review process for 5-year supply, and a 5-year review of the Local Plan in 2024/25, will both be ineffective in fulfilling the requirements of NPPF2018 to make best use of brownfield land, because the proposed housing trajectory and its five-year supply requirement lock in a presumption against brownfield sites being a source of supply.</p> <p>In our view, the only way to make the housing trajectory realistic and effective, both in overall delivery rates and in enabling brownfield sites to come forward to contribute to land supply, is to plan for a more gradual acceleration in supply of sites, with the peak build-rate coming later in the plan period.</p> <p>Addendum: 2018 Standard Method OAN</p> <p>As we write this evidence paper, the 2018 release of the standard method calculations of housing need has just been published. This indicates a reduction for Calderdale from 840 to 566 homes per year. We do not have time to fully analyse the implications of this change for the Local Plan at this stage. However, we anticipate that it will raise some crucial issues, including:</p> <ul style="list-style-type: none"> • Increased mismatch between demographic change and job growth aspirations; • A more realistic housing trajectory, with reduced peak land supply problems, potentially leading to better prospects of bringing brownfield sites into the supply; • Better prospects for meeting the Housing Delivery Tests; • Significantly reduced justification of exceptional circumstances for Green Belt change.

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6.12 to 6.41, SD4	<p data-bbox="336 510 995 548">Paras 6.12 to 6.41 and Policy SD4: Employment</p> <p data-bbox="336 568 1430 714">In our view there is a tension in the Plan between meeting NPPF’s requirement - quoted in para 6.13 - to meet the employment and development needs of businesses - and the sustainability challenge of meeting the employment needs of the population, as we have explored above (our Figure 1).</p> <p data-bbox="336 734 1430 880">The land requirement (para 6.18) makes welcome recognition of the needs of micro-businesses and SMEs. We also note from Table 6.8 that the majority of new jobs are envisaged to be in non-B use classes, and that these are not part of the employment land provision.</p> <p data-bbox="336 900 1430 1158">The difficulty for the Local Plan is therefore that it adopts a highly ambitious target for job growth, for which many of the jobs do not have an employment land requirement and are not therefore given any spatial characteristics in the Plan. We have already demonstrated that to provide a sufficient workforce for the planned job growth would require unrealistically large policy interventions in the face of the demographic trends. Consequently we do not accept that the job growth target is realistic on the basis of the available evidence.</p> <p data-bbox="336 1178 1430 1435">This is compounded by not having a spatial analysis of the types and locations of non-B class jobs: who will be wanting those jobs, and where will they live? Para 6.47 states that <i>“in order to reduce levels of commuting it is important that housing growth is aligned with opportunities to increase employment growth”</i>. Yet the majority of forecast job growth will not be associated with employment land allocations, and there is no evidence provided that the locations for new housing growth are related to where the non-B class jobs might be concentrated.</p>
6.2	<p data-bbox="336 1458 703 1496">6.2 Distribution of Growth</p> <p data-bbox="336 1516 1430 1706">In principle, we welcome and support the way in which the spatial pattern of growth has been informed by the physical and environmental constraints of the Borough. We also start from the positive perspective that urban extensions and new settlements might have potential to offer the most sustainable option for growth.</p> <p data-bbox="336 1727 1430 1830">Unfortunately, having considered Calderdale’s proposals carefully we have concluded that they do not amount to sustainable development. Our reasons for this are set out below.</p> <p data-bbox="336 1850 1430 1995">The emphasis on Brighouse for new housing development is a major departure from the established settlement hierarchy, effectively drawing the focus away from Halifax. This appears to be a decision based primarily on site availability, rather than on a positive strategic choice for sustainable development.</p>

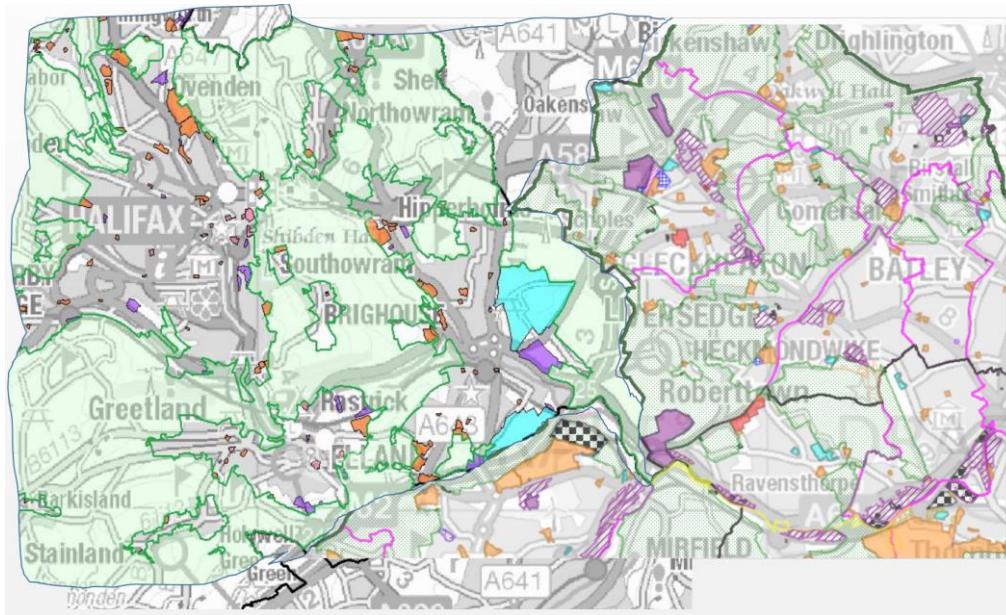
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6.2 cont'd	<p>In our view, any urban extension or new settlement should be highly accessible by rail or tram to the main relevant destinations for employment and leisure; to minimise the generation of additional car commuting. A journey by rail from the strategic sites (walking to Brighouse station) to Leeds or Bradford centres takes twice the time of driving, and it is very unlikely that rail would be the main modal choice for residents of those sites. From a transport point of view we therefore regard the strategic sites as unsustainable locations.</p>
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The Garden Suburbs at Brighouse encroach into the same broad area of countryside that maintains openness between Brighouse, Huddersfield and Cleckheaton, and which Kirklees Council are also proposing significant site allocations. Figure 5 shows the Calderdale and Kirklees Plan maps overlaid to illustrate the extent of cumulative reduction in openness in the area. With Huddersfield, Elland and Halifax already almost converging, and increasing risk of coalescence from Halifax, through Northowram and Shelf and into Bradford, there is a significantly less open settlement pattern emerging. The Garden Suburbs have been presented as quite self-contained additions to Brighouse, whereas in reality they form part of a much wider system of conurbation. The sustainability credentials of that conurbation have not been tested.

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Figure 5: Calderdale and Kirklees Plan Maps overlaid to show cumulative extent of new allocations



6.2 cont'd The Green Belt Review shows that the majority of the Green Belt across Calderdale is performing strongly; whilst the spatial distribution removes land from the Green Belt in a concentrated area on the edge of Brighouse. To the extent that the benefits of new development may be claimed to accrue to everyone in the Borough (meeting housing and employment needs), the harmful impacts of new development (loss of openness, increased congestion and pollution) will clearly be borne by some communities much more than others. Whilst it may be possible for the Garden Suburb approach to mitigate such issues, there is no evidence that the risks of these inequitable impacts have been assessed; and therefore the sustainability of the approach is unproven.

Therefore, in our view, the proposed distribution of growth has not been justified by adequate evidence that it would be effective, sustainable and equitable.

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6.52, Table 6.11	<p data-bbox="336 510 1182 548">Para 6.52 and Table 6.11 Distribution of employment growth</p> <p data-bbox="336 568 1430 640">This section is flawed because it conflates the pattern of land allocation with the pattern of employment.</p> <p data-bbox="336 665 1430 880">Referring back to Table 6.8, we see that the gross provision for new B-class jobs is 2,975, of which 2,043 are in offices. This is 43% of gross new jobs, with the remainder being in non-B classes. The overwhelming majority of the proposed floorspace requirement (Table 6.7) is for B8 distribution, yet this accounts for only 13% of new jobs (and that figure may even decrease as greater automation is introduced into warehousing).</p> <p data-bbox="336 904 1430 1196">It is therefore fair to say that distribution is a very minor job growth sector compared to offices and non-B classes. (The extent to which those other job sectors may be interdependent with distribution businesses is not evidenced in the Plan.) But this sets a context for the type and location of job growth that appears inconsistent with Para 6.52 which states: “...a high proportion of land that has been identified for its size and quality is greenfield in nature...the potential [brownfield] land does not provide sufficient opportunities for growth in jobs and productivity”.</p> <p data-bbox="336 1220 1430 1469">As a point of principle, offices should be highly accessible by public transport and be close to town centres, where they can support and benefit from the town centre economy. That is also crucial to supporting the growth of non-B class employment by providing office workers with retail, food & drink and cultural opportunities within an easy walk of their place of work. Therefore we must expect the majority of all new jobs in Calderdale to be focused in and around the town centres.</p> <p data-bbox="336 1494 1430 1709">It may be justified to allocate land, including greenfield land, for distribution on the basis of implementing a logistics and distribution strategy to support the wider economy; but that case is not made in the Plan. But it is disingenuous to suggest that substantial allocations of greenfield land are needed for employment <i>per se</i>, because that is not borne out by the evidence provided for the types of employment that are envisaged.</p> <p data-bbox="336 1733 1430 1881">Further, the dismissal of brownfield land in 6.52 is inappropriate, because re-use of brownfield sites closer to town centres is in itself a driver of the productivity and vitality of urban areas. This ‘win-win’ scenario does not appear to have been adequately considered.</p>

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SD5 Policy SD5

The site allocations for employment should be re-assessed in light of our comments above, with greater effort to make use of brownfield sites, and clearer connection between the proposed allocations and the types of employment envisaged. Greater opportunities for mixed-use sites should be explored.

With this in mind, and in addition to our general concerns about the approach to employment land allocations set out in this evidence paper, a number of employment sites have not been adequately justified. In each case we consider that the harm of development would outweigh the benefits and therefore be inconsistent with NPPF. Our site-specific objections are set out in our Table 1 below.

Table 1: CPRE objections to proposed employment site allocations (Policy SD5)

Site Ref	Location	Objection
LP0021	Ainley Top	Exceptional circumstances for Green Belt release not demonstrated; heritage impacts.
LP0960	South Lane, Elland	Inappropriate location for B1 uses - offices should be more centrally located.
LP1018 and LP1219	Holmsfield Industrial Estate extensions	Unsustainable location in access terms (as identified in the site report); ecological concerns.
LP1232	Clifton	Exceptional circumstances for Green Belt release not demonstrated; access and transport impacts; ecological impacts.
LP1618	Huddersfield Road, Brighouse	Exceptional circumstances for Green Belt release not demonstrated; heritage concerns.
LP1622	Cragg Vale, Hebden Bridge	Exceptional circumstances for Green Belt release not demonstrated; landscape impacts.

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SD6	Policy SD6 Mixed-use sites
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We support the principle of mixed-use sites and, as above, we would wish to see a greater proportion of new housing and employment uses (including B1, B2 and non-B uses) being focused on mixed-use developments, especially where this increases re-use of brownfield sites and secures the re-modelling of under-used land. Indeed it is very disappointing to see so few sites allocated for mixed-use.

SD7	Policy SD7 Housing Sites
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Our Table 2 on the next page shows our site-specific housing objections.

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Table 2: CPRE objections to proposed housing site allocations (Policy SD7)

Site ref	Location	Objection
LP0531	Whitehall Road, Illingworth	Green Belt impact: coalescence of settlements. Range of ecological and other unresolved impacts.
LP1216 and LP1229	Mill Lane/Old Lane, and Near Royd Ovenden	If Green Belt release is to be justified, then poor public transport accessibility, loss of green/open space and consideration of alternative, brownfield sites must be properly addressed. Topography means open space loss is much more significant than site report implies.
LP0782 and LP1543	Cock Hill Lane and Wade House Road, Shelf	Poor public transport accessibility, cumulative highways congestion impacts, heritage impacts. Results in disproportionate growth of Shelf relative to settlement hierarchy. Consequently the Green Belt release and subsequent allocation would enable an unsustainable pattern of development.
LP1451 and LP1463	Garden Suburbs, Brighouse	The exceptional circumstances for these major Green Belt changes have not been demonstrated. They would enable an unsustainable pattern of settlement with poor public transport and active travel accessibility, generate significant road traffic, skew the location of new housing away from centres of employment and undermine re-use of brownfield land. There would be significant loss of openness, and ecological and heritage impacts; these could potentially be partially mitigated by reduced quantity of development combined with Local Greenspace Designations, but such measures have not been proposed. The dependence on these two sites for the overall housing delivery in the Plan period is unrealistic, unsustainable and damaging to the soundness of the Plan.

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Policy CC1 and Table 10.1 Climate Change

CC1,
Table
10.1

We welcome the clarity given here about the Local Plan’s role in addressing climate change; this is markedly better than a number of other Local Plans CPRE has responded to. The policy objectives set out in CC1 are all worthy of support.

We also welcome the way that Table 10.1 identifies the other policies in the Plan that are relevant to the monitoring of progress on CC1.

The problem for the soundness of CC1 arises from the key policies in the Plan that will render it ineffective, and are also not cross-referenced to it for monitoring purposes. Principally these are:

SD3 and the Housing Trajectory, which create the conditions for excessive allocation, haste for housing delivery and a resulting inability to include brownfield sites within the land supply, all of which will compromise the locational sustainability and the design quality of development;

SD4, which makes no connection between the type of employment growth being sought, its land-use implications and the consequences for increasing or reducing climate change impacts and resilience;

SD5 and SD7, which regard the additional road traffic arising from development as a technical implication which can be addressed by road upgrades, rather than as any indication that the proposed location of development is unsound from a climate change perspective.

Sustainable location of development to optimise climate change mitigation does not feature in Table 10.1 with quantifiable targets and indicators.

Consequently, it is highly likely that the net effect of the Local Plan will be not amount to successful mitigation and adaptation for climate change, so CC1 is ineffective. It is changes to these other key policies and their monitoring that would address the problem.

HW1 to
HW3

Policies HW1 to HW3: Health and Wellbeing

In our view the key spatial policies in the Plan (SD3 to SD7) will fail to address key aspects of the health and wellbeing policies, in particular:

HW1 (iii) *“promoting and enabling healthy lifestyles as the normal, easy choice”*;

HW2 - HIA expectation (vi) for active travel, public transport and accessibility;

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HW3 5th bullet “*Strongly encouraging the re-use of vacant and derelict buildings and spaces (brownfield land)*”.

Crucially, these are presented as development management considerations, but there is no evidence offered as to how the spatial policies of the Plan will create the conditions for those considerations to be implemented. We cannot expect an HIA of a development to deal properly with active travel if it is on an allocated site in an adopted Plan, but that site is not well-located to promote active travel. Therefore, in our view, the health and wellbeing policies need to be significantly re-framed to set good standards for enhancing health and wellbeing at the Plan level.

It is also very significant, and worrying, that there are no monitoring indicators and targets offered for these policies, and therefore no sense of the direction or rate of progress that is hoped for. This must be addressed if the Plan is to be considered sound.

IM1 to IM5	Transport: Policies IM1 to IM5
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There appears to be an irreconcilable conflict between the repeated intention of reducing car dependency (para 13.6, Table 13.4, Policy IM4), which is welcome and is fundamental both to climate change response and to health and wellbeing, as well as sustainable development in a wider sense; and three inter-related aspects of the Plan:

- 1) The spatial emphasis of new development to the east of Brighouse, on sites which are principally accessible by car, place significant additional demands on the highway network, and offer limited prospects for active travel;
- 2) The abandonment of brownfield sites as a source of new land supply, which will increase the dispersal of development to peripheral sites and limit the scope for walkable, mixed-use redevelopments especially in Halifax;
- 3) The road-upgrade emphasis of the strategic transport interventions in Policy IM1 (although non-road interventions are noted and welcome) which will provide temporary relief from congestion and induce additional road traffic.

The sustainable travel ambitions of the chapter are laudable, but in our view they will be woefully ineffective. The *spatial* ambitions of the Plan need to be reviewed to address this.

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IM7	<p>Policy IM7 Masterplans</p> <p>If large development sites are to be delivered in ways that are sustainable and acceptable to communities, and meet their needs, then it is essential that masterplans should be developed not just in consultation with the Council, but in full consultation with the communities that will bear the positive and negative impacts. In our view, the 500-home threshold for this is far too high, and we would suggest that any site over 150 homes is large enough to warrant significant community participation at pre-application stage.</p>
HS1	<p>Policy HS1 Non-allocated sites</p> <p>The policy should make clear that the expectation for applications on non-allocated sites is that they should fulfil all of the criteria in this policy.</p>
HS2	<p>Policy HS2 Housing density</p> <p>There is a wealth of evidence that net densities below 45-60dpha are insufficient to support financially viable public transport and other key services such as local convenience shops. We therefore consider that this policy does not provide for sustainable development unless the general minimum density is at least 45dpha. The exceptions in part 2 of the policy allow for situations where a lower density is appropriate. Higher densities of 60dpha or over should be quantified for more central and accessible locations - which in any case should be where new development should be focused. As set out in our Evidence Paper 1, NPPF2018 sets out a much more robust approach to density than was previously the case, and as it will be a material consideration in planning applications from now on, it is our view that Policy HS2 must be shown to be consistent with NPPF2018.</p>
HS6	<p>Policy HS6 Affordable Housing</p> <p>There is a fundamental problem here. The emphasis on Brighouse and Clifton, and to a lesser degree Ovenden and Boothtown, mean that a large proportion of the market development, of which an affordable proportion can be sought, will be in Zone C and D areas with a lower affordable proportion. This means that there is no meaningful prospect of affordable housing being delivered through market housing schemes in Zones A and B. That means that other delivery mechanisms are essential to providing most of the affordable housing need in Zones A and B.</p> <p>In principle we support the use of exception sites to provide affordable housing in locations where market housing would not be permitted. Nevertheless, we are concerned that the exception sites policy as drafted will result in affordable homes being in peripheral locations that are inconvenient for people who need</p>

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affordable homes and may not have access to a car. This risk could be at least partially addressed by adding a criterion to HS6 that exception site applications will be granted if *“it provides a suitable, accessible and sustainable location for the type of development proposed”*.

In our view the viability clause in para 3 of HS6 should be reviewed for its consistency with NPPF2018.

19.3, GB1, GB2, GN1 to GN7 **Para 19.3, Policies GB1 and GB2: Green Belt; and GN1 to GN7**

We support policies GB1 and GB2 as far as they go, but there is a missing link. The requirements for local authorities to enhance their Green Belt, quoted in para 19.3 (NPPF2012 para 81, NPPF2018 paras 141 and 142), are not reflected in GB1 or GB2. As a result, the Plan will not be effective in implementing this crucial, enhancement role of Green Belt as set out in national policy. In our view an additional policy is required to deal with this.

The additional policy should:

- Set out what the Council intends to do to fulfil this enhancement objective in the Green Belt (an enhancement strategy);
- Give guidance on how new developments should contribute to and enable that enhancement strategy, and should not undermine it.

Clearly some of this meshes with the Green Infrastructure policies GN1 to GN7, in the sense that those policies encapsulate many of the enhancement activities that we would wish to see implemented. What is missing is a basis for harnessing the Green Belt as a land resource for the implementation of the GI policies.

GN4, Policy Map **Policy GN4 and Policy Map (Special Landscape Areas)**

We note the comments of the Shibden Valley Society relating to the boundary of the Shibden Valley SLA. Whilst we have not had an opportunity to study closely all the boundaries of SLAs, their objection highlights two issues that we believe affect the soundness of the policy.

Firstly, the presence of harmful developments within a landscape does not necessarily mean that the boundary should be drawn to exclude those harmful elements. The boundary inevitably creates a policy difference, and it is essential to avoid further degradation of an SLA by including the features that degrade it and setting a policy context for their determining their future development and/or restoration.

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Secondly, it therefore follows that the SLA boundaries should reflect transition points in the underlying landscape (vistas, topography, geology etc) and the features that characterise it. These will be able to continue as defensible boundaries long into the future as specific land-uses come and go.

As an example, it is our view that had these two points been embraced by the current Development Plan, then the prominent and damaging existing development at Swalesmoor Farm (site WLP2) would not have been permitted: it lies outside the SLA boundary but has a profound impact upon the SLA.

MS6 Policy MS6: Mineral Site Restoration

We note and support the comments of the Shibden Valley Society in objection to this policy. With particular reference to the clause *“Where applicants are unable to submit full restoration details at the planning application stage”* it is difficult to understand why, and in what circumstances, this scenario might arise.

Therefore we ask that this clause be deleted, as it will invite applicants to demonstrate that they only need submit an indicative, rather than comprehensive, restoration scheme. If the applicant subsequently wishes to alter the extent, landform or timescale of the mineral extraction or of the filling and restoration, then this should be subject to a new planning application. If there are specific reasons why a less prescriptive approach might be appropriate, these should be set out and be subject to scrutiny through the Local Plan Examination.

22.3, MS7 Para 22.33 and Policy MS7: Oil and Gas

It is unclear how this policy can be resolved with Policy CC1. Use of fossil fuels is inherently carbon emitting, and their continued extraction extends the time over which dependence on their use will persist. This in turn will compromise the meeting of carbon reduction targets. From an energy security perspective, it is already evident that the number of new extraction facilities needed, especially for shale gas, would be too many and too cumulatively damaging to be acceptable to communities. Further, that scale of oil and gas development would represent a major shift towards a high-carbon economic and employment strategy for Calderdale, which the Plan does not propose and which would run counter to the objectives of sustainable development.

In this context, we consider MS7 is not positively prepared, because it works against the principles of sustainable development that underpin NPPF, and puts legally binding national and local carbon reduction targets further out of reach.

At the very least, each part of the policy should contain an additional requirement, that:

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“The proposal can be clearly demonstrated to be compatible with the objective of reducing carbon emissions and mitigating climate change.”

WA2, WA4, site WLP2 **Policies WA2, WA4 and site WLP2**

In the context of our comments on Policy GN4, it is evident that site WLP2 is anomalous and should be deleted. Its effect on the Shibden Valley SLA will be a significant cumulative landscape impact alongside the existing huge warehouse buildings and adjacent quarrying activity, and the only way for development of the site to be considered acceptable would be for it to demonstrably mitigate and enhance the landscape.

This leads us to suggest that WA4 could be made sound in this regard, by modifying the third bullet:

“the proposal will not create unacceptable impacts, individually or cumulatively, on ecological, heritage or landscape assets, including their setting, and will take every possible opportunity to enhance those assets and their setting.”

END