

### Section 1 - Summary: CPRE's headline comments

1. The clustering of development locations close to the motorway junctions, facilitated by Green Belt releases, will allow a drift of development activity away from urban areas, reduced urban regeneration, more road traffic, more carbon emissions and worse air pollution. There is also a high risk of coalescence of settlements across the motorway, resulting in loss of countryside and loss of openness between the urban areas of West Yorkshire.
2. There is no overarching target or commitment to reducing carbon emissions, nor any convincing mechanisms in the plan to do so. Combined with the road-based emphasis of most development growth envisaged in the plan period, this leads us to consider the draft plan not to be legally compliant in relation to carbon reduction obligations.
3. The concentration of employment land allocations along the river corridors without adjacent provisions for residential developments, combined with a tendency for housing allocations to be peripheral to the urban areas in locations poorly served by public transport, will hinder the potential of the plan for urban placemaking and will worsen road traffic congestion and air quality.
4. The plan's approach to employment neglects a number of potential growth sectors and therefore over-emphasises others. The translation of employment targets into housing growth targets creates a lack of focus on reducing worklessness within the existing population, with result that the plan's contribution to Kirklees' overall employment objectives is weakened.
5. The calculations of objectively assessed housing need have been grossly inflated. In our view a housing target in excess of 25,000 homes, or 1,400 per year, would depend on a series of scenarios that cannot reasonably be expected to occur, and would therefore be contrary to national policy and practice guidance.
6. Exceptional circumstances for taking land out of the Green Belt for development have not been adequately demonstrated and justified by the evidence, and consequently the outcomes of Green Belt changes will be predominantly negative.
7. The proposed approach to windfall sites flies in the face of the evidence that they continue to be a reliable, ongoing source of land supply for development.
8. The scale of proposed new minerals allocations and areas of search appears excessive compared to the justification of needs and compared to the potential impacts on the landscape and local amenity.

For these reasons, the plan will not make a suitable contribution to the sustainable development of Kirklees. In our view, the harm will outweigh the benefits. The plan as published is therefore unsound. However, relatively straightforward changes, most importantly to reduce the housing target to a more realistic level and promote more mixed-use development within urban areas, could produce a much more visionary and sustainable plan that, in our view, could be implemented and could be considered sound.

It has not been possible at this stage for us to cover all our areas of concern in the detail that we would wish. Therefore we intend to produce additional evidence in preparation for the Public Examination. Beginning with this consultation response, and progressing towards the Public Examination, CPRE will be:

- Further examining the new sites for impact both on Green Belt and on urban green space.
- Refining our evidence to further challenge the housing and employment numbers that the urban extensions are predicated on.
- Challenging the apparent strategic decision to allow settlements to merge across West Yorkshire.
- Undertaking further study of the proposed minerals policies and allocations.

## **Section 2: How has the Plan changed in relation to the main concerns we raised about the Consultation Draft?**

Comparing the PDLP with the DLP, it appears that most of the shortcomings we highlighted in February 2016 have not been addressed, which is deeply disappointing. These points are summarised below, and remain key reasons why the plan is, in our view, unsound.

The plan lacks urban vision - no change.

Spatial distribution is weighted inappropriately towards Kirklees Rural - there have been some improvements here, mainly facilitated by the addition of the proposed urban extension at Ravensthorpe/Thornhill; but there have also been proposed new allocations at Hade Edge and Scholes (Holmfirth), and the disproportionate growth of Clayton West has not been addressed.

The housing requirement is not realistic, being based on a flawed relationship between economic aspiration and housing growth, and on an annual housebuilding rate that cannot reasonably be expected to happen - no change.

The housing requirement should be segmented by type and tenure, to ensure the right homes are built - no change.

The proposed densities of new housing developments is too low to facilitate sustainable development - no change.

The housing trajectory is not credible - it has been revised, but still it still fails to identify how and when an adequate rate of completions could realistically be expected to deliver the plan target.

The affordable housing policy is not effective - no change.

The design requirements are weakened by loopholes in policies - no change.

The minerals allocations require further evidence - the minerals allocation proposals have changed significantly, and need careful analysis due to the potentially high impacts on landscape and local communities where this was not previously envisaged.

In responding to the Publication Draft Local Plan (PDLP) we have sought to provide further evidence of why the plan is unsound in relation to these headline points, and where possible to put forward constructive suggestions as to how the plan could be made sound.

### **Section 3: Urban vision and spatial distribution - What is the proposed spatial plan for Kirklees?**

The majority of employment allocations follow the River Colne corridor through Huddersfield to Colne Bridge, with a smaller stretch along the Holme Valley through Brockholes and Honley; continuing along the Calder to Ravensthorpe. Most of these sites also have the potential for rail accessibility, and make good use of available brownfield sites. In principle, this is to be welcomed.

The key exceptions to this pattern are employment and mixed-use allocations close to each of the motorway junctions, principally:

MX1911 at Lindley Moor Road (M62 J24);

E1832c at Cooper Bridge (close to M62 J25) (although this is also a limb of the river corridor pattern);

E1985a, E1831, B&S11 and B&S12 between Gomersal and Scholes, around M62 J26;

B&S3 at Birstall (M62 J27);

MX1905 and adjacent sites at Chidswell, close to M62 J28 but also relatively accessible from M1 J40.

The balance of take-up between the river corridor sites and the motorway-facing sites therefore has a strong potential impact on whether employment growth in Kirklees has an urban, brownfield emphasis or a more peripheral, road-based one. Considering that most of the proposed new allocations for this Local Plan are the peripheral ones, we are concerned that the pattern of allocations may imply a drift of employment location away from the urban river/rail corridors and towards the motorway.

The crucial problem, however, is that the pattern of proposed housing allocation is significantly more dispersed and out-of-town than the employment, which will tend to result in disproportionate encroachment into the countryside. In some significant areas, this problem will be exacerbated by nearby housing allocations proposed in neighbouring authorities, resulting in settlements effectively coalescing. The pattern of housing growth can be generalised as follows:

- A major urban extension sites at Bradley - close to Calderdale proposed allocations to the south of Brighouse;
- A major urban extension site at Ravensthorpe/Thornhill which, although a potentially sustainable location, faces significant barriers to delivery due to road network congestion and other infrastructure concerns;
- Mixed-use site and adjacent housing sites at Chidswell, amounting to a large-scale expansion of Dewsbury towards East Ardsley, which itself is proposed for significant growth in the Leeds Site Allocations Plan;
- A thinly dispersed pattern of other housing sites across Kirklees, with disproportionate local impacts on several small settlements including Rowley Hill, Scholes (Holmfirth), Hade Edge and Kirkheaton;
- An anomalous, out-of-proportion growth of both employment and housing at Clayton West, in a location with poor public transport accessibility and very heavy road traffic that already has a major negative impact on local environmental quality in the village.

Very few of the proposed new housing allocations could be argued to have acceptable public transport connectivity.

It is clear that there is a high risk of a missed opportunity for Kirklees, wherein the river corridor sites that pass through the town centres, enjoy rail accessibility and elements of green infrastructure, *should* offer great potential for a much more mixed-use, higher density pattern of development, bringing population closer to both employment sites and town centre facilities and making fuller use of public transport. Instead, the likely pattern of development will be dispersed housing schemes, more edge-of-town developments

around the motorway junctions, and insufficient emphasis on re-using brownfield sites. The results will be a worsening of the already severe road traffic problems in the area, and a lack of development focus to support the vitality of town centres and local centres.

On a positive note, we are pleased to see extensive allocations of urban greenspace, which is central to the quality of life of the District. There is a need to demonstrate a strategic approach to such greenspace, to prevent it from being eroded by built development.

#### **Key recommendations to enable an urban vision and a sustainable pattern of development**

- **Revise the employment land strategy to be appropriate to the needs and opportunities of each settlement, especially with regard to opportunity sectors that are not currently well represented in the plan, such as tourism and creative industries.**
- **Re-categorise the majority of employment sites along the river corridors as mixed-use, so that business and residential development can both be concentrated in central, accessible locations and can support town and local service centres.**
- **Revise the spatial distribution to increase the urban focus and reduce allocations to Kirklees Rural, especially reducing the scale of development of Clayton West. Housing and employment growth in rural settlements should be directly targeted to the needs and opportunities of those settlements and should not be part of the general allocations.**
- **Significantly increase the minimum and average net density for new housing, to at least 40 dpha, thereby facilitating more sustainable patterns of development as well as reducing the pressure to remove land from the Green Belt for development.**
- **Significantly reduce the scale of motorway-junction clusters of development, especially where these will tend to encourage coalescence with adjacent towns.**
- **Give urban green spaces strategic strength in policy, by affording them equivalent protection from inappropriate development to that enjoyed by Green Belt land.**

#### **Section 4: Employment and Housing Growth**

The KES objective of 75% employment rate, whilst laudable in principle, is flawed in practice, not least because it does not take account of self-employment, which accounts for around 10% of the economically active population. The KES has not been adopted by the Council and does not offer a robust basis for the economic aspirations of the Local Plan.

At the 2012/13 base date used for the Employment Technical Paper, self-employment was at 9.6%, around 26,400, which when added to the employed figure of 186,700 gives a combined total in employment and self-employment of 213,100, or 77%. We have termed this the 'combined employment rate' as it differs slightly from the rate of economic activity that includes registered unemployed. Recent historical trends show that economic activity is in gradual decline (see figure XXX), so maintaining a combined employment rate of 77% would actually be a very aspirational objective. At the upper end, an 80% combined employment rate would represent a dramatic improvement compared to the baseline, and would probably be the highest rate that could ever be achieved, bearing in mind those people who choose not to work.

The SHMA's demographic baseline is that the total population of Kirklees will grow by 11% over the plan period, but that the under 65 population will grow by just 17,000 people (4.7%). Using data from the Labour Market Profile 2016, if the 16-64 population grew by 5%, the economically active population would need to be:

$(273,200 \times 1.05) = 286,860$ , of which 77% is 220,882, and 80% is 229,488.

So, if the population rises as predicted, then to maintain the 77% combined employment rate by 2031 would require 14,282 more people to be in employment or self-employment, rising to 22,888 if an 80% combined employment rate were to be achieved. It is therefore reasonable to suggest that the Local Plan should assume job growth within this range, but that this should include consideration of the potential for growth in self-employment, and the planning implications of promoting that growth.

If 80% of the projected additional working age population by 2031 found employment or self-employment, this would require around 14,000 of the new jobs. From this we may infer that:

- Maintaining a 77% combined employment rate would equate to providing sufficient work for the increased working age population, who require additional households;
- Increasing to an 80% combined employment rate would provide a further 9,000 jobs to reduce worklessness amongst people already living in Kirklees.

This is an important point, because it means that unless a substantial outcome of employment growth is to reduce worklessness within the existing population, then the result will be that additional jobs will go to in-migrants or in-commuters, but the aspiration to improve the employment rate will fail.

#### Planning for different types of jobs

The principal drivers of local job growth are, on the one hand, appropriate training and skills, and on the other hand, the opportunities for supply chains to grow, both around local entrepreneurs and to benefit from inward investment. Spatial planning has little influence on the training and skills situation, but is important in terms of providing premises and infrastructure for businesses throughout supply chains. With this in mind,

there is a distinct omission from the Plan in that it gives very little consideration to several employment sectors, including tourism, creative and service industries that contain high numbers of micro-businesses. As a consequence, the locational and land supply provisions of the plan are unduly dominated by manufacturing, office and logistics. A much finer grain approach is required, and in our view this would be facilitated by re-allocation of many existing and proposed employment sites to mixed use, especially those within the inner urban areas, so that tighter-knit neighbourhoods of residential and small business uses can be encouraged, with real place-making opportunities. High densities would be required for those sites. This would also have benefits for boosting the supply of sites for housing in more accessible, sustainable locations close to employment.

### The relationship between employment growth and housing growth

Whilst there may be shortcomings in the ONS projections of household growth, they do represent a standard methodological baseline shared across all Local Plans, and it is therefore appropriate to use them for the purposes of consistency. Since a primary driver of migration between districts, and of international migration, is employment, it must also be assumed that these matters are already factored into the ONS projections insofar as they represent a 'policy-off' expectation of household change. To plan for different numbers than the ONS projections may therefore be assumed to be a policy intervention.

As we have demonstrated, if an improvement in the employment rate is desired, then a policy intervention to provide more homes than the ONS projections suggest will be needed is likely to be counter-productive, because it will tend to generate two problems:

- A supply of homes for people not working in Kirklees, thereby increasing rates of out-commuting;
- Additional workers moving into Kirklees but a failure to improve the rate of employment within the working age population.

Therefore, in our view, adding an extra provision of new homes above the projected rate of household growth is likely to be counter-productive in economic terms.

Most of these people already have homes, but some of may wish to move to a better home and/or form additional households, so there may need to be an allowance

At present, the modelling of employment and household growth used to inform the Plan is unduly complicated and opaque. In our view, the analysis could be greatly simplified by comparing the ratio of the existing population to numbers of dwellings and of jobs, as we demonstrate below.

2013 baseline: population 428,300; dwelling stock 182,559; combined employment 213,100

Gives 2.35 people per dwelling, 2 people per job and 1.17 dwellings per job.

For 2031, a population increase of 47,000 at 2.35 people per dwelling would require 20,000 new homes.

At 1.17 dwellings per job, 20,000 new homes would be expected to equate to 17,094 jobs. This is a mid-range scenario between the 14,000 and 23,000 new jobs as set out above which, at 1.17 dwellings per job, would equate to 16,380 and 26,910 new homes.

The aging population will produce more single person households, decreasing the number of people per dwelling, but will increase the number of dwellings per job. Mathematically these tend to cancel each other out.

It should be noted that the range 16,380 to 26,910 homes by 2031 would equate to between 910 and 1,495 homes per year over the 18 year plan period. It is important to note that these figures both exceed the 20 year historical mean completion rate of 794 with the upper figure representing an 88% boost in supply compared the long-term trend. This contrasts with the Local Plan housing target of 1,730 per year (31,140), which by our calculations would imply a provision for over 26,000 jobs. In other words the proposed Local Plan target for housing over-provides for job growth-related housing need by between 17% and 90%, as well as requiring a more than doubling of housing supply compared to the long-term trend. This is plainly unsound, since it cannot be justified by the available evidence and provides for a scenario of population growth, job growth and housing market growth that cannot reasonably be expected to occur.

#### **Key recommendations for a sustainable housing and employment strategy**

- **Reduce the housing target:** building on our evidence presented for the Consultation Draft Local Plan, plus our new evidence on employment growth presented here, we maintain our view that a housing target of around 25,000 homes, or 1,400 per year, is the maximum that could be considered to be sound.
- **Refine the employment target:** we consider that a job growth target of 23,000 may be considered sound, so long as it includes self-employment and explicitly prioritises the reduction of worklessness within the existing population, alongside reducing out-commuting, as crucial elements of a sustainable employment strategy.
- **Demonstrate that the employment land policies and allocations are informed by a much fuller understanding of the range of potential growth sectors than is currently evident.**

## Section 5: Land Supply

CPRE strongly supports the provision of the right types of development in the right places. In our view, all new homes should add to the sustainability of places by prioritising the need for affordable dwellings, achieving maximum possible standards of design and energy efficiency, and making best use of previously-developed land and optimising travel by sustainable modes. To achieve this, land supply should be appropriate to the types of development needed; it should be focused on sustainable locations and, where there is a need to revitalize urban areas and re-use brownfield sites, supply of greenfield sites needs to be appropriately constrained and phased to maintain a focus on those sites needing re-use. We also consider that 45 dwellings per hectare is the minimum net density that can be deemed sustainable in terms of supporting local amenities and public transport.

If our recommendation of re-categorising many employment sites along the river corridor as mixed-use were accepted, then this would clearly have an impact on the land supply calculation - increasing the housing land supply and decreasing the employment land supply proportionately. Bearing in mind that we would expect the residential densities of those sites to be significantly higher than average currently proposed, our expectation is that such sites would have a proportionately greater benefit for housing land supply. We also consider that the reductions in employment land supply need not necessarily be substituted like-for-like on alternative sites, because a more refined, multi-sectoral approach to employment is likely to require fewer hectares of land at higher average employment densities. We hope to undertake more detailed analysis of this in preparation for the Public Examination.

There are four other aspects of the Plan's approach to housing land supply that we do not consider sound, which are outlined below.

### Brownfield sites

All local authorities are now required to produce brownfield registers, although the timescale for compliance has not been specified. In the pilot study, involving 53 local authorities, CPRE (reference) found that on average the pilot areas showed an 11% increase in brownfield supply compared to the previous data from the National Land Use Database (NLUD). Bearing in mind that brownfield registers will mirror the SHLAA process and be frequently updated, this is perhaps not a surprising result, but it highlights the importance of having up-to-date data on the availability of brownfield sites if the aim of encouraging re-use of brownfield sites is to be implemented. Kirklees was not a pilot area, but it will need to produce a register soon, and in our view this should be completed prior to Public Examination of the Plan. Para 5.4 of the Housing Technical Paper suggests that brownfield land is a finite resource; this is not strictly accurate, since there is always a supply of previously-developed sites becoming available for re-development. The high historical contribution of windfall sites to housing supply is evidence in itself of the

ongoing brownfield land resource, and of the importance of having a frequent monitoring regime. In our view, the plan will not be sound unless it is based on an up-to-date evidence that includes a brownfield register.

### Windfall sites

Windfall sites have accounted for the majority of supply of housing completions since 2001, with no sign of this trend tailing off. Indeed the draft plan offers no evidence that the supply of windfall will tail off; instead it states that having an adopted local plan with substantial new land allocations will have the effect of reducing windfall supply. CPRE strongly objects to this approach, because it runs counter to the evidence and risks eschewing a historically reliable source of supply that facilitates the re-use of previously developed sites. The success of windfalls as a source of supply is reflected in Kirklees' commendably high brownfield development rates in recent years, and would be deeply wrong for Kirklees to lose its focus in this regard: the result would be a dispersal of development and a loss of urban concentration. Furthermore, derelict sites have a degrading effect on local environmental quality and on the market viability of adjacent sites, so there is a sustainable development imperative to re-use those sites.

It must also be noted that a significant proportion of the recent annual uplift in new housing completions nationwide has arisen from conversion of offices and other buildings to residential under relaxed permitted development rights - which is effectively windfall. Although this presents risks in terms of the loss of stock of other buildings, then unless Kirklees were to propose zones in which permitted development rights would be removed, it is likely that this particular source of windfall supply is likely to at least persist, if not increase.

The plan proposes to deal with windfall sites by assuming that any currently available site already has planning permission, and that new windfall sites will take time to come through the planning process, and therefore that windfall sites should not contribute to the five-year supply calculation. The effect of this can be seen in the Housing Trajectory: if existing windfall sites are included within planning permissions it can be seen that their contribution to land supply dramatically reduces during the period 2017-21. This directly contradicts the evidence of windfall as a reliable, ongoing source of supply.

There is, of course, a risk that relying more on windfall sites could make development patterns less plan-led. To avoid this risk it is important that windfall sites are assessed for their fit with the settlement hierarchy and spatial objectives. In our view this should be achievable through annual monitoring of an up-to-date brownfield register, and of course at planning application stage, but it may also be helpful to include a policy in the plan, indicating the general locations and assessment criteria within which new windfall sites would be welcomed. This would create the potential for 'plan-led windfalls' without the risk of blighting existing uses by earmarking their sites for future redevelopment.

### Green Belt impact

We have already set out our position that an unsound basis for housing and employment land numbers, combined with low residential densities that will be unsustainable, do not create exceptional circumstances for taking land out of the Green belt. In that context we do not accept that land should be removed from Green Belt to provide a source of land supply. We provide site-based objections separately, but in our view that strategic case for Green Belt losses has not been justified by the evidence.

Furthermore, the Green Belt review does not adequately assess the role of the Green Belt as a whole, nor of specific sites, in contributing to the Green Belt's purpose of assisting urban regeneration by encouraging the re-use of urban brownfield land. The Green Belt review wrongly assumes all Green Belt sites to have an equal contribution to that purpose; it seems inevitable that allocation land from the Green Belt for both housing and employment uses in clusters near to the motorway junctions will have the effect of shifting the emphasis of development activity away from the urban areas.

We also have specific concerns that many of the proposed allocations from Green Belt will not provide housebuilding at a sufficient rate to make a meaningful contribution to land supply. This is particularly true of the urban extension sites at Bradley and Chidswell, where their proximity to other large residential allocations proposed in Leeds and Calderdale presents a high risk of market saturation in those areas, and also calls into question the plan's assumption that Kirklees operates as a self-contained housing market area. If large amounts of new housing are being built on either side of an administrative boundary, then the housing market is likely to operate across that boundary and place constraints on the completion rates on those sites. Considering that these locations are also where the purposes of the Green Belt are under particular threat from settlement coalescence and urban sprawl, the very real risk that they may not adequately contribute to housing supply in a timely manner greatly undermines the strategic case for taking those sites out of the Green Belt. If that strategic case is to be made soundly then it must be on the basis of much clearer co-operation between the neighbouring authorities than is currently in evidence.

### Key Recommendations for a sound approach to housing land supply

- Re-allocated employment sites along the river corridors to mixed use and recalculate land supply accordingly.
- Produce a brownfield register to inform land supply evidence in advance of the Public Examination, and acknowledge that brownfield land is not a finite resource.
- Revise the approach to windfall sites to ensure that a good supply of windfall sites continues and that they are consistent with the settlement hierarchy and spatial objectives of the plan.
- Re-run the Green Belt review to take proper account of the Green Belt's purpose in encouraging urban regeneration.

- **Reconsider the strategic case for Green Belt changes, on the basis that the deletions currently proposed have not been justified by the evidence, will detract from urban regeneration and are unlikely to contribute to boosting housing supply in a timely fashion.**
- **Revisit the Duty to Cooperate to show clearly how the combined effects of development proposals close to the boundaries between Kirklees, Leeds and Calderdale are to be managed and will deliver sustainable outcomes.**

### Section 6: Proposed Site Allocations

A full list of proposed allocations on which we raise objections is provided in our separate document 'CPRE's Site-Specific Objections'.

We have identified 'priority objections' where we are particularly concerned that proposals for an allocation or a group of allocations will create unsustainable outcomes. These are outlined below.

**M62 Junction 26 cluster:** These sites inappropriately draw economic activity away from urban centres and towards the motorway network, encouraging increases in road traffic, congestion, air pollution and carbon emissions. These allocations also enable coalescence of Cleckheaton with Bradford (Oakenshaw), and when considered alongside the proposed urban extensions at Brighouse in the Calderdale Local Plan, there is a very profound reduction in the open countryside separating Brighouse, Cleckheaton and Bradford. With this range of negative impacts at stake, there has not been adequate demonstration of exceptional circumstances for removing sites from the Green Belt.

**H351 and H1747, Bradley Park:** These sites are adjacent to one of the proposed urban extension sites in Brighouse, separated only by the motorway and a narrow stretch of woodland. The risk of Huddersfield and Brighouse coalescing at this location is therefore extremely high. The harm posed by this allocation is increased due to the loss of a key public recreational amenity for which no nearby replacement has been identified. Consequently there is insufficient justification of exceptional circumstances for removing this land from the Green Belt, where its Green Belt status is currently preventing coalescence of settlements and maintaining open countryside that is thereby retained for recreational amenity.

**Chidswell:** Not only will the urban extension here have a high landscape impact, but it is poorly served by public transport and will have huge impacts in terms of road traffic with associated congestion, air pollution and carbon emissions. It is also one of the few tranquil areas separating the towns of West Yorkshire, and when combined with site allocation proposals around East Ardsley and Tingley in the Leeds Site Allocations Plan, will

effectively allow coalescence of Dewsbury and East Ardsley. This is a major intrusion into the Green Belt for which sustainable development benefits - and therefore exceptional circumstances - have not been demonstrated.

Clayton West: Whilst there may be merit in providing a combination of employment growth and housing growth in one settlement, Clayton West is clearly a poor choice for such growth. The cumulative effect of all the proposed allocations there would amount to about a 30% growth in the settlement footprint, in a village that is poorly served by public transport and already heavily punished by road traffic, including a steady stream of HGVs. There is no other village in Kirklees facing this level of impact, and it is at odds with the settlement hierarchy.

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