

Is the Plan's approach to assessing site allocation options and releasing land from the Green Belt soundly based and consistent with national policy?

1. Site Assessment all questions

1.1 We have covered elsewhere the problem of the distribution and location of development being led primarily by site availability.

1.2 We should point out the connection to our position on residential density. This is, because we consider 45dhp to be the appropriate minimum density, then sites not deemed suitable for at least that density should have been filtered out.

1.3 It is self-evident that if, as we believe necessary, the spatial objectives of the Plan are revised in order to properly respond to the climate challenge, then site assessment criteria for walkability need to be revised, and sites whose development is contingent upon new road infrastructure that will induce additional car traffic should be rejected unless there are compelling justifications to do otherwise.

2. Green Belt questions a to d

2.1 We refer the Inspector to document EV09 *Assessment of Exceptional Circumstances for Release of Green Belt* (February 2019).

2.2 Para 3.2 of that report states that at the Cabinet meeting in February 2018, the Council endorsed a housing figure of 840 dwellings per annum based on the standard method without an economic uplift, translating into 9,015 allocations, and notes that a key motivation for this decision was the desire to minimise impact on the Green Belt. In the Stage 1 hearings the Inspector found that a housing figure chosen to minimise Green Belt impact was not necessarily compatible with the Plan's employment growth ambitions.

2.3 In CPRE's view, the tests for exceptional circumstances are effectively sequential, as follows:

- Can the objectively assessed need for development be met without reviewing the Green Belt?
- Do the benefits of meeting the objectively assessed needs outweigh the degree of harm to the Green Belt that results?
- If the Plan wishes to plan for a greater level of development than the objectively assessed need, do the benefits of doing so outweigh any resulting additional harm to the Green Belt?

2.4 In EV09, the Council begins by stating that it selected a housing figure that would minimise Green Belt impact. It then recognises the emerging changes to NPPF at the time, which raise the bar for assessing exceptional circumstances in relation to brownfield and under-utilised

land and increasing densities, and states that each of the alternative sources of land in NPPF2019 para 137 have been exhausted, and that exceptional circumstances therefore exist. It then concludes that its preferred way to minimise impact on Calderdale's Green Belt as whole is to place a very high impact on one area – the Garden Suburbs – rather than a more diffuse impact over a wider geography.

2.5 Our objection to this approach, as set out in our representations, is as follows.

2.6 The Plan's complete abandonment of brownfield land as a source of allocations is not adequately evidenced, as it has been a steady source of supply for many years. NPPF2019's raised bar on under-utilised land is significant, because it requires a more rigorous, up-to-date study of urban potential.

2.7 The Plan's working density of 30dpha is far too low, because development has to achieve at least 45dpha-60dpha before it is likely to support walkable amenities and viable public transport, and because inner urban sites should be aiming for at least 80dpha. The Council's evidence shows that recent developments – which have been predominantly brownfield – have been achieving high densities, and that is excellent news. Ensuring a focus on inner urban land, including under-utilised land and buildings, is essential to revitalising town centres and promoting modal shift in travel. The changes to the Use Classes Order indicate that Government policy is moving further in favour of such initiatives, and it would be much better to use Local Plan allocations to achieve this so that design, density and public realm standards can be upheld in a way that GDPO schemes do not.

2.8 The concentration of Green Belt release in one area creates a significant risk that the impacts of development will be inequitable, because some communities will lose most of their immediate countryside, while other communities will not benefit from any new development. A greater emphasis on re-using brownfield and under-utilised land and buildings within Calderdale's urban areas offers hugely greater potential to bring benefits to all communities.

2.9 The Garden Suburbs cannot be regarded as consistent with NPPF because they will inevitably be built at the lower end of the density range, are therefore profligate in land-take, and are likely to be very car-dependent. They are also contingent upon road upgrades which in themselves will take further land and induce growth in road traffic. These outcomes are diametrically opposed to the now well-established needs for absolute reductions in car journeys and a transformation in walking and cycling, in the interests of climate response, air quality and public health.

2.10 Therefore, we conclude that the Council has not adequately demonstrated that meeting its objectively assessed needs depends on Green Belt release, and it has proposed an

approach to Green Belt release that is, in itself, unsustainable. Facilitating unsustainable development cannot be a justification of exceptional circumstances.

2.11 Moving on to the implications of the increased housing figure, this falls into the category of planning for a growth scenario higher than the objectively assessed need. As we covered in Matter 7, the higher figure is categorically unsound because it is based on a level of employment growth for which there is no workforce. There cannot be exceptional circumstances to release Green Belt for development that is not needed.

2.12 Even if the additional growth were considered plausible, and additional housing needed to support it, it is necessary to consider whether the benefits of providing that additional development would outweigh the harm caused by the development. As set out in our response to the February 2020 consultation, the additional sites cause strategic, cumulative harm by putting an even higher proportion of new households beyond reasonable walking distances of town centre amenities, and **very** far from new employment sites. We have analysed the local harm in our site-by-site objections in that consultation, and need not repeat that commentary here.

2.13 In conclusion, we ask the Inspector to consider the following key points of our position.

- The additional housing growth proposed is unsound, so the current OAN is 840 per year, taking us back to the 9,015 allocations described in EV09.
- The 2016 and 2018 household projections indicate that housing need may well be falling below 840, so releasing Green Belt now in the context of a falling trend may be premature.
- Given the Council's starting position of aiming to minimise Green Belt impact, it is startling that a quarter of the entire 2018 proposed allocation is directed towards two very large Green Belt sites, and that the additional 2020 allocations are also directed to Green Belt, without – as far as we can see from the submitted evidence – an urban capacity study. The Sustainability Appraisal does not provide robust evidence to enable any alternative spatial solutions to be compared.
- The pattern of proposed Green Belt releases, and their contingency upon road upgrades, puts them directly at odds with the need for climate action and road traffic reduction.
- Given that recent average densities in Calderdale have been 45dpha, the proposed minimum density of 30dpha is simply an invitation to developers to build at lower densities, and is therefore incompatible with NPPF2019. Building 9,000 homes at



45dpha uses 200ha of land, compared to 300ha at 30dpha, and would bring with it the sustainability benefits of more compact development.

- **The exceptional circumstances for Green Belt release have therefore not been demonstrated.**