

*Are the proposed Garden Suburbs justified, effective, deliverable and in line with national policy?*

1. Woodhouse Garden Suburb questions a and i

1.1 We referred in our Matter 8 statement to the recent report *Garden Villages and Garden Towns: Visions and Reality*, which contrasts the images presented in the masterplans for 20 such schemes across the country, with the reality that *“nearly every new garden community hinged on major road improvements to cater for a massive expected rise in car use...90% of garden community plans appeared to be associated with road capacity increases, such as dualling roads, enlarging numerous road junctions, new bypasses, fast link roads...A number of garden community locations appear to be actually selected to finance a new bypass or other ‘strategic link’.”*

<https://www.transportfornewhomes.org.uk/wp-content/uploads/2020/06/garden-village-visions.pdf>

1.2 The Plan currently provides no evidence with which to persuade the Inspector that the outcomes of the Brighouse Garden Suburbs will not be typical of those identified above. Indeed, that we already know they are associated with road capacity increases demonstrates the likelihood that they will follow exactly that pattern.

1.3 The Calderdale Inclusive Economy Strategy (EV63) p10 states “Over time we may need and secure a new junction, 24a, on the M62 to help accommodate this scale of growth.”

1.4 Document CC01 (Council response to Inspector’s Pre-Hearing Note) devotes several pages to a Strategic Framework Plan for the South-East Calderdale & North Huddersfield Spatial Priority Area, including a map at p9 of that document. The map clearly indicates the proposed J24a for the M62, as well as a wider ‘Garden Community Corridor’. It is unclear how this connects to the Local Plan, but it is very clear from the map and from several references in the text that J24a is regarded as a priority transport investment.

1.5 Within the LP1451 EIA evidence (REF) we find the Highways England Scoping Report (24 June 2020). Page 4 of this report states:

*“Highways England are not currently promoting a Junction 24a and do not consider it a sound nor robust approach to identify an infrastructure solution which is not within the considerations of the stakeholder required to deliver it. An ES founded on the delivery of a Junction 24a is considered fundamentally flawed and, therefore, should consider the existing SRN provisions with the TA identifying such mitigation as is required and deliverable.”*

1.6 There is evidently a startling disconnect between the importance given to J24a in the Strategic Framework Plan, the equivocal tone taken by the Inclusive Economy Strategy, and Highways England's obvious intent to distance itself from such proposals.

1.7 Given the length of time that a road scheme that is not even within Highways England's current programme, and set against the context of the climate emergency and WYCA's 2038 carbon target, is inappropriate, irresponsible and undeliverable to make substantial housing allocations contingent on J24a – a scheme that should not, and probably will not, go ahead.

1.8 As per our other representations and statements, Woodhouse Garden Suburb will increase the proportion of housing in Calderdale that is outside a reasonable walking distance of town centres and rail stations, will perpetuate car-dependent movement patterns, and will remove most of the last remaining openness between south Brighouse/Rastrick and the M62. This will be exacerbated by its proximity to the Bradley Park allocation in Kirklees. In our view this cannot reasonably form a justification of exceptional circumstances for Green Belt change.

2. Thornhills Lane Garden Suburb questions c, d and k

2.1 Our comments on Woodhouse Garden Suburb above apply equally to Thornhills Lane. There are also the substantial heritage, ecology and landscape concerns for LP1463 which other representors articulate in much better detail than we can provide here, as our representations are principally strategic.

2.2 We believe two crucial questions need to be answered in relation to LP1463:

- How will the proposed strategic link road specifically deliver the absolute reductions in road traffic needed to address WYCA's zero-carbon 2038 target?
- Considering that reducing the impact of development on sensitive landscapes elsewhere in Calderdale has been an explicit part of the Council's spatial strategy, why is such a large proportion of the remaining attractive, open landscape that benefits the people of Brighouse being as the largest since housing allocation?

2.3 Without compelling answers to those questions it is not possible to conclude that exceptional circumstances exist for the Green Belt changes here.