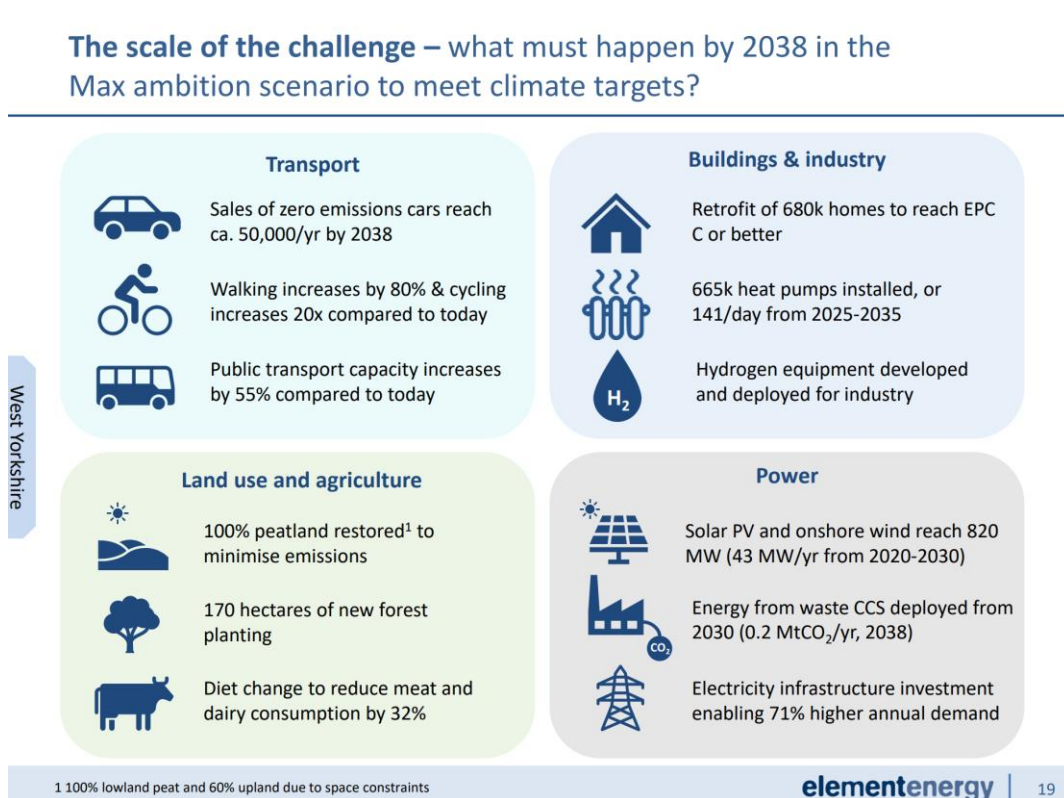


Does the Plan set out a robust and viable framework for the delivery of growth and infrastructure?

1. Growth Strategy, Question c

1.1 We note that the Council’s Working List of Modifications (CC57) includes proposed changes to Policies SD1 and SD2, in order to reflect NPPF2019. Following our evidence paper of September 2018 outlining why we considered the Plan should be evaluated against new NPPF as well as NPPF2012, we are delighted to see that compatibility with new NPPF is now being addressed. This informs our position.

1.2 Climate change is a rapidly-evolving topic and it is inevitable that new evidence has emerged since our previous representation. The recent report *West Yorkshire Emissions Reduction Pathways* for WYCA (July 2020) <https://www.westyorks-ca.gov.uk/media/4232/wy-cerp-technical-report-v6.pdf> examines the scenarios needed to reach net zero emissions by 2038. We have reproduced a key graphic from that report here for easy reference.



1.3 Some of these actions cannot be significantly influenced by the Plan. The actions that can be directly influenced by the Plan are:

- Dramatic increases in walking and cycling – through spatial patterns and infrastructure that prioritises these modes and reallocates road space, and the report also specifies a reduction in car mileage of at least 21% by 2038;
- Retrofit of homes and renewable energy – through development management policies, by specifying that the Council’s Climate Emergency declaration and 60% target are material considerations;
- New tree planting – through green infrastructure policies and strong links between new built development and new green infrastructure.

1.4 Document CC62 – Technical Note 13: Assessment of Cumulative Impact – was added to the Examination Library only two working days before the statement deadline, and we have not been able to interrogate it thoroughly. However, we note that it refers (in para 2.6.3) to National Road Traffic Forecast (NRTF) projecting a 20% growth in car traffic and a 29% growth in light goods vehicle traffic over the period 2014-32. That is a car traffic growth rate of 1.11% per year, and if that continued to 2038 there would be a 30% growth in road traffic 2014-2038. If this represents a ‘policy-off’ scenario, and a ‘policy-on’ scenario to achieve 21% traffic reduction by 2038 is required to implement the WYCA net-zero target, then this actually means that **road traffic levels in Calderdale in 2038 need to reduce by around 40% compared to the ‘policy-off’ scenario.**

1.5 NPPF2019 para 148 states that the planning system should “*help to shape places in ways that contribute to radical reductions in greenhouse gas emissions..*” Considering that the Local Plan *can* influence those four actions above, then compliance with NPPF requires that it *should* act measurably in all four.

1.6 Some representors may argue that the developments resulting from the Plan will have marginal impact on emissions compared to those arising from the existing stock of buildings and infrastructure. This is a shortsighted and, frankly, neglectful perspective, which we consider may also be unlawful in regard to the Climate Change Act 2008 as amended by Statutory Instrument 1056. There are three reasons for this.

- As we outlined in our Matter 7 hearing statement, the Plan is proposing to deliver an annual housebuilding rate three times the 10-year historical average. These new homes should all be required to be zero carbon, so as to deliver around 10,000 zero carbon homes in Calderdale by the end of the Plan period as a direct result of the Plan and the associated growth envisaged.
- The spatial strategy for growth is heavily skewed towards the east of the district, with particular emphasis on the proposed Garden Suburbs. This strategy should

demonstrably optimise the delivery of zero-carbon homes, produce a pattern of movement that is dramatically more walking and cycling-based and less road-dependent, and deliver substantially more new green infrastructure, compared to alternative spatial strategies, in order to make a net positive contribution to tackling greenhouse gas emissions.

- The ‘policy-on’ growth scenario assumes and plans for significant road upgrades, which will inevitably increase road traffic, at least unless a highly aggressive traffic reduction strategy is pursued alongside it. Since net reductions resulting from take-up of ultra-low emission vehicles cannot begin to show any effect until well into or even beyond the Plan period, and depend on actions outside the Plan’s scope, the growth scenario must be able to demonstrate that it brings with it a significant net carbon reduction based on actions within its scope.

1.7 It may also be suggested that the scale of emissions reduction that is required would in itself render the growth strategy and the delivery of housing and employment growth targets unviable. Again, our position is that planning for radical emissions reduction is required both by NPPF and by law, so a Plan that does not do so cannot be sound, regardless of viability.

1.8 We warmly welcome the insertion of an overall emissions reduction target, and in our view Policy CC1 must indeed refer to the target if any meaningful connection is to be made between the policy and the target. We will return to CC1 under Matter 24.

2. Question f to j, and Policy IM4

2.1 As discussed above, the context for this policy is the quantifiable needs identified in the CERP report, if West Yorkshire is to achieve its 2038 net-zero carbon target. Appendix 1 to that report identifies these as:

- 21% reduction in car journeys;
- 78% increase in walking;
- 2000% increase in cycling;
- 39% increase in bus travel;
- 53% increase in rail travel.

<https://westyorkshire.moderngov.co.uk/documents/s16572/Item%2011%20-%20Appendix%201.pdf>

2.2 It is therefore beyond doubt that mechanisms to achieve sustainable travel must be core requirements for the Plan. In this context it is an encouraging start that Table 13.4 includes a target for year-on-year reduction in the percentage of journeys being made by private car, but this is included without a baseline trend and does not embrace the absolute reduction in car use, and associated modal shift, that is necessary.



2.3 It is therefore extremely worrying that 12 out of the 21 strategic transport interventions in Policy IM1 are road upgrades. There is incontrovertible evidence spanning decades that new and upgraded roads almost always induce additional traffic.

2.4 For the Plan to be considered positively prepared to deliver necessary outcomes, justified by the available evidence, and compatible with West Yorkshire's net-zero carbon target, then any and all strategic and local transport interventions must be explicitly geared to achieving the scale of modal shift outlined above. Interventions that cannot pass that test should be deleted from the Plan. To the extent that this may require changes to the growth strategy and spatial strategy, that is also a necessary consequence of responding to the climate emergency.

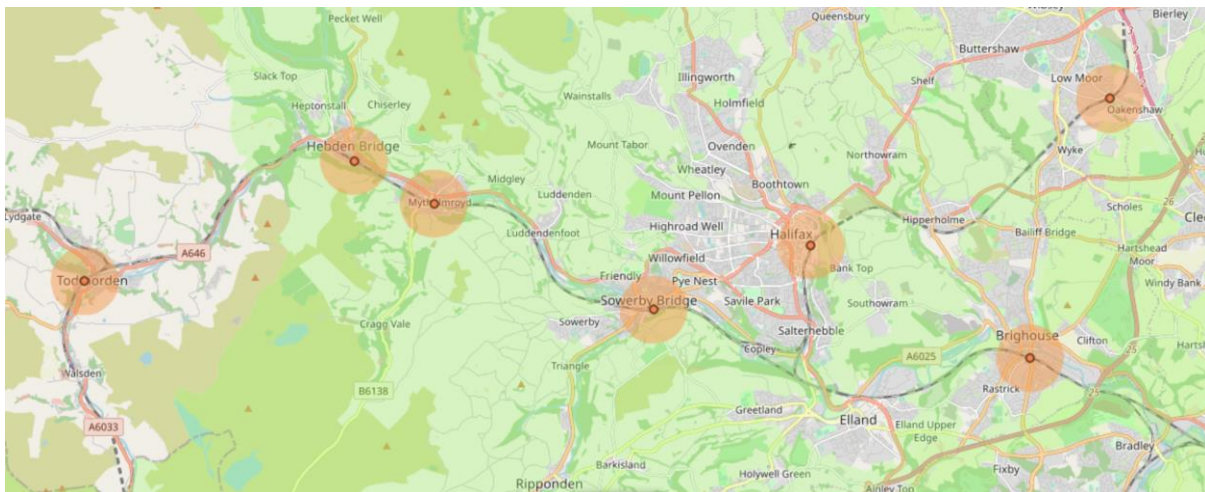
3. Policy IM5

3.1 This policy is directed at new development, and in relation to climate response and modal shift, a key function of new development must be to implement the Plan's objectives, including carbon reduction and modal shift in travel.

3.2 Para 13.30 in the Draft Plan states (our emphasis):

*“Access to other higher order settlements outside of Calderdale including Huddersfield, Bradford, Leeds, Burnley, Rochdale and Manchester are equally as important as Halifax and Brighouse. To encourage sustainable transport this access should be easily achieved by public transport, therefore in **most cases allocations and development proposals** should be located either within walking distance of such a centre or within 400m walk of a bus route and stop with a 30 minute service to a main town or 750m walk of a train station which provides direct access to such services.”*

3.3 Figure 2 below shows those parts of Calderdale (shaded orange) that are within 750m of a railway station.



3.4 Zooming in on Halifax and Brighouse, Figure 3 below superimposes this rail accessibility measure onto the Local Plan map (red outlines), with the principal proposed site allocations shown.



3.5 It is clearly evident that only the tiniest percentage of new allocations and development proposals are rail accessible when measured against the Council's own criteria. A proposed new station at Elland would make only a marginal difference. Whilst buses of course improve this connectivity to some extent, the crucial consideration is this: anyone living or working within a new allocation, including the Garden Suburbs, who wishes to travel by train to access facilities in other towns, must first of all make a journey to the railway station that falls outside the 750m walkable radius. It would be farcical to describe this as a spatial strategy that supported sustainable travel and modal shift, and the Plan is clearly set up to fail in regard to reducing car journeys.

3.6 Policy IM5 refers to a hierarchy of road users, putting pedestrians, disabled and emergency services at the top, and private cars last. We support this. The hierarchy raises two important issues:

- Within development, we expect the hierarchy to clearly correlate to prioritisation of space. A simple test of this is: if children are playing in the street, would drivers expect them to be doing so, and expect to give way to them?
- Beyond the development, we expect the development to facilitate the implementation of the hierarchy – that is, the development should make modal shift in the surrounding neighbourhood more likely to happen than it could otherwise be. A key test would be: does the development result in more people being within an easy, safe walk of local amenities, and do the access arrangements for the new development facilitate this?

4. Policy IM7

4.1 CPRE supports the use of masterplans for all significant developments, including employment and mixed use sites: there is no good reason why employment locations should be any lesser 'places' than residential ones. Such plans should always be produced with full community engagement.

4.2 In our view the problem with Policy IM7 is that it is presented as a development management policy – a set of expectations that applicants on large schemes should fulfil. In reality any large housing site should be a proactive intervention in a place, and as such the Council and the local community should be providing a place-specific set of aspirations for that place that informs the masterplan. Further, a size threshold is inappropriate, as in some places a scheme of even 50 homes could have a potentially big effect.

4.3 Caution is needed, however. Connecting this policy with the Garden Suburbs, we draw the Inspector's attention to two recent reports, which highlight that the implementation of masterplans and design standards often fails to deliver their intended goals.

4.4 Firstly, the Housing Design Audit, which found that 75% of new housing development since 2004 should have been refused planning permission when assessed against established design quality criteria within planning policies.

<https://indd.adobe.com/view/23366ae1-8f97-455d-896a-1a9934689cd8>

4.5 Secondly, *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>

We will return to these factors in matter 15.

4.5 Given the critical importance of Policy IM7, and the wide range of considerations it encompasses, it is worrying that Table 13.7 offers a monitoring target and indicator only in relation to high-speed broadband provision. The monitoring framework for this policy needs major modification. Our recommendation would be that the indicator should be 'proportion of new developments achieving the design goals agreed in the masterplan' and the target should be close to 100%.