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*Does the Spatial Development Strategy in the Plan present a positive framework which is consistent with national policy and will contribute to the achievement of sustainable development?*

1. Questions a to e

- 1.1 Para 6.43 does indeed indicate that the spatial pattern of development has been governed by the suitability of sites, rather than by a settlement hierarchy. It is important to examine the word 'suitable'. It could refer to technical suitability in terms of topography, environmental constraints and access to infrastructure. It could also refer to strategic suitability, i.e. the degree to which development of a particular site is a suitable way to implement the spatial strategy. Sites which are technically suitable but not strategically suitable should be rejected, but that is only possible if there is a spatial strategy that is informed by the overriding question: what pattern of development is the Plan aiming to achieve?
- 1.2 The selection of additional sites put forward in the February 2020 consultation provides startling evidence of an availability-led approach, especially as there is no reference at all to Greetland in para 6.46 where the broad locations for growth are identified.
- 1.3 Whilst we acknowledge that settlement hierarchy is far from the only way to determine a spatial pattern, it is self-evident that the existing hierarchy represents a long-established status quo – the 'policy-off' spatial pattern. A decision to distribute growth in a way that diverges from the settlement hierarchy is therefore a specific policy intervention. It therefore needs to be justified by evidence that to diverge from the prevailing settlement hierarchy will produce a more sustainable outcome than following it.
- 1.4 In Calderdale, the amended draft Plan will result in:
- Brighouse becoming only marginally smaller than Halifax in terms of built-up area, but with a substantially smaller and less appointed town centre;
  - Greetland taking a huge share of growth relative to its existing size, despite the proposed site allocations sitting between 2km and 3km from Elland town centre and therefore well outside walkable distances;
  - A further, disproportionate share of growth at Shelf, despite its remoteness from both Halifax and Brighouse.
- 1.5 Convincing evidence has not been put forward to show that these divergences from the existing settlement pattern will offer a more sustainable outcome. Further, when the proposed new settlement pattern involves such major changes to the Green Belt, there must be clear evidence of the ability to deliver a significantly more sustainable outcome than could otherwise be achieved, if exceptional circumstances are to be found. In our view the Sustainability Appraisal is not robust enough to supply this evidence, which leads us to the conclusion that the chosen distribution is opportunistic, rather than strategic.

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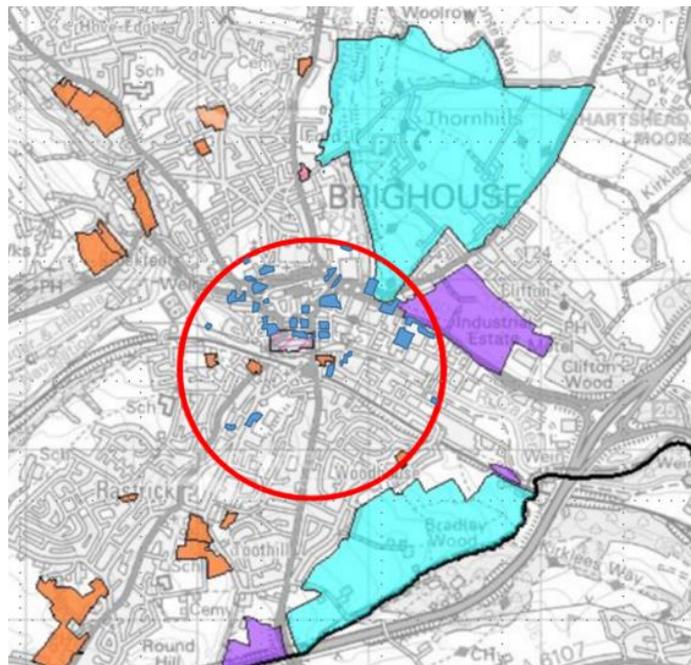
## 2. Question g

- 2.1 It should be noted that CPRE does not object in principle to new settlements and urban extensions. However, it is essential that they result in exemplary outcomes for sustainability in absolute terms, and are demonstrably more sustainable in relative terms than the incremental growth of existing settlements. Where they remove land from the Green Belt, our position is that to show exceptional circumstances it is necessary to show exceptional outcomes.
- 2.2 We would therefore refer the Inspector back to our Matter 8 statement, and ask whether the Garden Suburbs will deliver transformational levels of zero-carbon homes, walking and cycling, car journey reduction and new green infrastructure. We need to see compelling that development at this scale could deliver those transformations in theory, and is likely to do so in reality.

## 3. Question i

- 3.1 The key change in NPPF2019 concerns para 137, which effectively raises the bar for justifying exceptional circumstances for Green Belt change, by first optimising both the re-use of brownfield land and increases of densities. In our view it would be difficult for the Council to argue that the Plan has passed this test, and we believe modification is needed. This is not so much an issue for Policy GB1, which is largely a development management policy, but for the strategic approach across the Plan as a whole.
- 3.2 We have previously criticised the Council's approach to brownfield land, which effectively writes it off as a source of housing supply. Much of it is in locations that are closer to existing town centres and to the rail network, and should therefore offer greater scope for car travel reduction and walkability. More central locations tend to support higher density development and therefore make more efficient use of land. And recycling of derelict and under-used land – for buildings or for public space – is a beneficial outcome for sustainability and placemaking in its own right, so long as it is done to a high standard with community support.
- 3.3 We are concerned that the focus on large, peripheral site allocations reduces the likelihood of effective town centre regeneration and of brownfield sites coming forward. We acknowledge the Council's position that PDL is drying up as a source of supply, but considering that both completion rates and brownfield rates have been quite stable for many years, this is difficult to accept. Since modifications to the Plan are now being put forward to align with NPPF2019, we consider that the focus on large peripheral sites conflicts with para 117, and also with para 134(e) in regard to the purpose of the Green Belt in supporting urban regeneration.

3.4 In Figure 4 below, we have used satellite imagery to visually plot (in dark blue) the land within the 750m walkable radius of Brighouse railway station that is currently given over to surface car parking – both public and private. We estimate this to be around 8.5 hectares, which at a traditional inner urban density (80dpha) is equivalent to around 600-700 homes.



3.5 Clearly car parking cannot be eliminated from town centres, and the housing estimate is only illustrative. But surface car parks are obviously wasteful of space and prohibit land within walkable areas from being used effectively, and building on top of them is a win-win scenario. Increasing the population of this inner area would be greatly beneficial in:

- supporting town centre shops and businesses;
- making rail-based commuting a more attractive option;
- regenerating the physical environment of the town centre;
- assisting with climate response by reducing the need for car journeys associated with new development;
- keeping peripheral land open for green infrastructure, recreation and agriculture.

**3.6 Unless and until spatial options of this kind have been properly assessed, it is unreasonable to conclude that the requirements of NPPF paras 117 and 134(e) have been fulfilled.**

4. Question j

4.1 NPPF2012 para 81 is the same as NPPF2019 para 141, and requires local authorities to plan positively for their Green Belts as a source of amenity and public goods. There is no inherent requirement that a quantitative reduction in Green Belt should be mitigated by a qualitative enhancement of what remains, but nevertheless this para does explicitly require action on behalf of the local authority. The draft Plan does not provide coverage of how this positive planning is to be done.

4.2 CPRE's position is a simple one. The Green Belt is providing a vital function for the people of Calderdale by keeping open countryside permanently within reach. If, as planned, the population is to grow significantly, then the need for that Green Belt to provide that function also grows. It should grow in terms of the ecosystem services it supplies, and in terms of accessibility and enjoyment. This applies whether or not land is taken from the Green Belt for development and, indeed a key measure of the justification for any changes to Green Belt should be that they enable its enhancement.

4.3 The Green Infrastructure policies GN1 and GN2 cover a range of considerations including wildlife networks, nature reserves, open spaces etc, but the key point about Green Belt – and Green Belt change – is that it provides a specific land use tool with which to safeguard and enhance green infrastructure.

5. Question l

5.1 We would support the inclusion of an overarching policy, which should begin from the premise that growth is not the end in itself, but is a crucial mechanism to deliver the spatial strategy in the context of climate response and socio-economic challenges. The Bradford Core Strategy is a useful exemplar here, which we would commend. It begins with a Strategic Core Policy SC1 outlining overall approach and spatial priorities, followed by SC2 setting out the approach to climate change and sustainability.