

Calderdale Local Plan – Publication Draft – Working List of Modifications (April 2020)

Status of Modifications

This is a **working draft list** of Modifications to date (Main and other Modifications). At this stage not all consequential modifications to the supporting text are included, although the general direction of travel is shown. This task is more appropriately undertaken for the final list of modifications prior to consulting upon them. The scale of some Modifications is significant requiring substantial modifications to the Local Plan. Some sections will require a complete write through in order that the Local Plan reads coherently. Specifically:

- Table 1 and Table 2: Residential capacities of sites are continually being amended as new information becomes available and whilst this level of detail has not been included in these modifications the current capacities and site status can be found in Appendix 3 to the Housing Technical Paper (published March 2020)

Tables of amendments and corrections:

- Table 1 – Calderdale Local Plan Publication Draft (LPP)
- Table 2 – Calderdale Local Plan Publication Draft Appendix 1 Site Allocations Supporting Information (APX)

Officer Notes

Key:

- Deleted text - strikethrough (~~example~~)
- Inserted text - underline and italics (*example*)

Reason for change:

- Error – Use when a mistake is identified
- Correction – Use when making changes based on feedback e.g. site area due to availability
- Clarification – when adding text to clarify meaning or policy but not changing the thrust of the policy
- (Qualify reason for change)
- Text highlighted in yellow needs reviewing by individual officers – The yellow highlight has been left for the benefit of the Inspector to show changes to this text are/will be required. Where necessary notes in **bold** indicate the nature/need for modification.

Table 1 – Calderdale Local Plan Publication Draft (LPP)

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16	Para. 2.42	<p>Population</p> <p>Projections relating to the change in population numbers are produced by the Office for National Statistics (ONS) every 2 years. The most recent projections are the 2016 based Sub-National Population Projections released on 24 May 2018. The national perspective of the growth of the England population suggests that it is projected to increase by 4.983 million from an estimated 55.268 million in mid-2018 to reach 60.251 million by mid-2033, a 9% growth overall. In terms of local data, it shows that Calderdale's population is projected to grow from 210,700 in 2018 to 219,300 by 2033, an overall increase of 8,600, or about 4%. This is a significant reduction in the growth projected in the previous Sub-National Projections (2014) which indicated growth about 19,000 or 9%.</p>	Error - This discrepancy is due to the fact that the two sets of data are based on different population projections, whilst the figure in Table 2.5 refers to the 0 - 14 age group unlike paragraph 2.45 which refers to the under 16 age group. This generalisation is due to the ONS population data only being readily available in 5 year age cohorts. As this paragraph does not add anything to the Local Plan it could be deleted. Furthermore, Table 2.5 and paragraph 2.44 are based on the now withdrawn	MM																																
16	Table 2.4	<table border="1"> <thead> <tr> <th colspan="8">Population Projections 2016 and 2014 Based</th> </tr> <tr> <th>Year</th> <th>2018</th> <th>2020</th> <th>2025</th> <th>2030</th> <th>2033</th> <th>CHANGE</th> <th>%-CHANGE</th> </tr> </thead> <tbody> <tr> <td>Population (2016 Based)</td> <td>210,700</td> <td>212,300</td> <td>215,800</td> <td>218,200</td> <td>219,300</td> <td>8,600</td> <td>4%</td> </tr> <tr> <td><i>Population 2014 (Based)</i></td> <td><i>211,671</i></td> <td><i>213,946</i></td> <td><i>219,333</i></td> <td><i>223,896</i></td> <td><i>226,385</i></td> <td><i>-19,009</i></td> <td><i>-9.1%</i></td> </tr> </tbody> </table> <p>Source: ONS Sub-National Projections 2016 Based and 2014 Based</p>	Population Projections 2016 and 2014 Based								Year	2018	2020	2025	2030	2033	CHANGE	%-CHANGE	Population (2016 Based)	210,700	212,300	215,800	218,200	219,300	8,600	4%	<i>Population 2014 (Based)</i>	<i>211,671</i>	<i>213,946</i>	<i>219,333</i>	<i>223,896</i>	<i>226,385</i>	<i>-19,009</i>	<i>-9.1%</i>		
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16	Para. 2.43	<p>These figures are projections, but the trend is obvious that the population is continuing to grow, but at a significantly slower rate than was indicated in previous projections, the growth is also projected to be slower than that of England as a whole. The implications of the revised population projections will be worked through by the ONS later in the year when the mid-year Household Projections will be released. Currently the Household Projections are those from 2014, released in 2016, and these are used as the basis for the standard methodology to determine Local Housing Need.</p>																																		
16	Para. 2.44	<p>Population Change by Age Group</p> <p>The rate of growth for different age groups within the overall population is not even. As shown in the table below, the largest growth is projected to be in the over 65's. By the end of the Plan period there are projected to be over 14,200 people over 65 year of age, with over 9,300 additional people over 75 years. Of significant concern must be the reduction in population between 25 and 64 amounting to 5,200 of the potential working age population.</p>																																		
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		Year	2018	2020	2025	2030	2033	% CHANGE	2016-based sub-national population projections, as is Row 1 of Table 2.4 along with references in paragraph 2.42. This information should also be removed from the Local Plan. Adding figures from the 2014-based population projections for age cohorts to the Spatial Portrait is not considered necessary.	
		Age	-	-	-	-	-	-		
		0-14	39,200	39,400	38,800	37,400	37,000	-2.91		
		15-24	22,100	21,800	22,200	23,700	23,600	6.7		
		25-44	51,500	51,700	51,700	52,252	49,800	-3.4		
		45-64	59,000	59,100	58,300	57,420	55,500	-6.0		
		65-74	22,300	22,600	23,100	25,845	27,200	18.1		
		75+	16,700	17,900	21,800	25,401	26,000	55.6		
		TOTAL	-210,700	212,300	215,800	-218,200	-219,300	-4%		
17	Para. 2.45	Figures show that there is a projected decline in the under 16 age group population of about 2,200 during the 15 years to the end of the plan period, meaning that there could be less pressure on the education system as a whole across Calderdale.								
19	Para. 2.61	For the Core Strategy to be sound the housing requirement figure must be based on robust evidence of need and deliverability and this has been provided by the Strategic Housing Market Assessment and related Housing Requirements Study. These studies and their findings are discussed fully in the Local Plan.						Error – refers to Core Strategy and 2011 SHMA /HRS superseded by later SHMAs	Minor? MM?	
21	Para. 2.71	Since the recent flooding in December 2015, the Council adopted a <u>Local Flood Risk Management Strategy in June 2016</u> . It has been based on four principle objectives:						Clarification - Incorrect reference to the Local Flood Risk Management Strategy.	Minor	
22-25	Vision paras. 3.4 and 3.7	In response to the Publication Version of the Local Plan representations were made regarding adding wording to para. 3.4 & the Vision Narrative (3.7) to reflect the importance of the built and historic environment making Calderdale a distinctive place.						Clarification and Additional Detail	Minor	

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		The Council did not propose any modifications in relation to these representations. However, the Council recalls that that at the Stage 1 hearings a modification was proposed by the Inspector. Confirmation is sought and a further modification to these paragraphs will be made if necessary.		
28	Para. 4.14	Strategic Objective 3: Economy and Enterprise "Create a resilient sustainable economy founded upon innovation and enterprise; building upon the exceptional character of Calderdale and our location within Leeds City Region and proximity to Manchester and <u>transitioning to a low carbon future</u> ."	Correction – recommendation by Friends of the Earth.	Minor
29	Para. 4.25	Historic England have their own vision for Calderdale, <u>which the Council share</u> , that the unique quality of Calderdale’s historic environment will be fully recognised and the potential contribution that it can make towards the economic well-being of the area, and to the wider recreational and educational needs of the community will be more fully exploited. Specifically:...	Correction - This would demonstrate the Council’s support for Historic England’s vision.	Minor
34	Policy SD1	Presumption in Favour of Sustainable Development When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development. It will always work pro-actively, with applicants, in order to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area. <u>As a means of securing sustainable development the Council will:</u> <ul style="list-style-type: none"> <u>Work pro-actively with applicants in order to find solutions so that applications can be approved wherever possible;</u> <u>When considering development proposals, take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.</u> <p>Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.</p> <p>Where there are no Local Plan policies relevant to the application or relevant policies are out of date at the time of making the decision, the Council will grant permission unless material considerations indicate otherwise. – <u>This will involve</u> taking into account whether:</p> <ul style="list-style-type: none"> Any adverse impacts of granting permission would significantly and demonstrably <u>clearly</u> outweigh the benefits, when assessed against the policies in the National Planning Policy Framework (taken as a whole); or 	Correction - To reflect NPPF 2019	MM

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36	Policy SD2	<p>• Specific policies in the Framework indicate that development should be restricted.</p> <p>Sustainable Development All new development <i>plans and proposals</i> within Calderdale is expected <i>should seek</i> to make a positive contribution to sustainable development by <i>following these principles (where they are relevant):</i></p> <ul style="list-style-type: none"> • They Supporting support the identified local needs of Calderdale's communities; • Addressing climate change including adaptation and mitigation; • Achieving development in accessible locations, and which can be accessed safely by a number of different travel modes; • Protecting and enhancing local, national and internationally important biodiversity and geo-diversity sites; • Ensuring development reflects the local and historic character of the area; • Requiring new development to be built using sustainable construction methods; • Reducing the levels of waste arising from development; • Ensuring development supports the health and well being of the local community. • <i>They should make efficient use of land and infrastructure, particularly by utilising previously developed 'brownfield' land, achieving housing density targets in order to minimise the use of 'greenfield' sites and promote appropriate mixed land uses integrated with the existing built form;</i> • <i>They should promote economic, environmental and social well-being including health and safety of the population;</i> • <i>Secure reductions in social inequalities and disadvantages within the community particularly in relation to the location of employment, housing, shopping and other community facilities;</i> • <i>Ensure protection or enhancement of the quality of natural assets including water, air, soil, minerals and biodiversity;</i> • <i>Support for vibrant and viable town centres;</i> • <i>Delivery of high quality well designed development taking into account local distinctiveness;</i> • <i>Improve the quality of local landscapes and protection of the character of the wider countryside;</i> • <i>Preservation or enhancement of historic and cultural features of acknowledged importance;</i> • <i>Provision of convenient and integrated accessibility by public transport, cycle and foot and seek to ensure development facilitates use of modes alternative to the private cars and is located to support reductions in the need to travel;</i> • <i>Facilitate efficient use of natural resources such as water; and</i> • <i>Support/Facilitate renewable energy generation and energy efficiency measures to reduce the causes and help mitigate the effects of climate change.</i> 	Correction - To reflect NPPF 2019	MM

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		<p><i>Neighbourhood Planning bodies are also encouraged to consider these principles in the preparation of their Neighbourhood Plans.</i></p> <p>Note: Following Modification the Council is considering whether or not this Policy is necessary</p>								
37	para 6.2	<p>The level of housing need in Calderdale has been derived using the Government's standard housing methodology, and used the most recent datasets published by the Office of National Statistics in 2016. The Plan will meet the housing need of the Borough for a period of 15 years. The Plan period is therefore 2018/19 – 2032/33. As the most up to date figures are being used, these take into account any under supply over recent years. Planning Practice Guidance is clear that when using the standard methodology for calculating housing need, there is no need to factor in previous levels of under supply as any under delivery will be reflected in the affordability adjustment.</p> <p><i>The report “Modelling the economic implications of the proposed housing requirement” produced by Turley in 2019, identified a requirement of 1,040 homes per annum to support the ‘policy-on plus transport’ economic growth forecast. The revised housing requirement figure largely adheres to these findings but given the complexity and assumptions around modelling, for example, economic activity, commuting rates, population change, household formation and economic participation rates uncertainty exists about the extent to which these assumptions can be relied on. This uncertainty inevitably increases towards the end of the forecast period. Therefore the housing requirement figure reflects the Turley research and modelling for the first ten years of the Plan period based on the ‘policy-on plus transport growth’ scenario but employs the Turley ‘baseline growth’ scenario for the final five years of the Plan period. Given the requirement in National Planning Policy to review Local Plans every five years the current Local Plan will have been reviewed well in advance of the final five years of the current plan period. Reviews will be informed by the most recent evidence. The revised housing requirement figure is set out in Table 6.1 below.</i></p>	To reflect both the revised approach to calculating the housing requirement and increase in the housing requirement following the stage 1 hearings as set out in “Housing Requirement Update and Potential Supply” (HRUPS).	MM						
37	Table 6.1	<p>Table 6.1: Housing Need in Calderdale Requirement 2018/19 – 2032/33</p> <table border="1"> <thead> <tr> <th></th> <th>Number</th> </tr> </thead> <tbody> <tr> <td>Total <u>Housing Requirement</u> 2018/19 – 2032/33</td> <td>12,600 <u>14,950</u></td> </tr> <tr> <td><u>Dwellings per annum Average Annual Housing Requirement</u></td> <td>840 <u>997*</u></td> </tr> </tbody> </table> <p>* rounded</p>		Number	Total <u>Housing Requirement</u> 2018/19 – 2032/33	12,600 <u>14,950</u>	<u>Dwellings per annum Average Annual Housing Requirement</u>	840 <u>997*</u>	To reflect the increase in the housing requirement following the stage 1 hearings as set out in “Housing	MM
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			Requirement Update and Potential Supply” (HRUPS).	
37	Para 6.3	<p>Sources of Housing Supply</p> <p>Whilst the housing needs of the Borough are to be met largely from new land allocations, the Local Plan makes allowances for various aspects of housing supply that contribute to delivery, which means that the actual allocations for new land that the Plan makes are less than the overall level of housing need <i>housing requirement</i>. The various components of housing land supply are discussed below, and set out in the Table 6.2.</p> <p>Note: Following Sources of Supply to be updated when Modifications published including 2019/20 monitoring year. Current position (31/3/20) set out in Housing Technical Paper published March 2020.</p> <p>Extant Planning Permissions - The Council’s Housing Land Availability database (HLA) has shown that at 30 September 2017, there were a total of 2,360 dwellings that have planning permission (excluding outline permissions) which had not yet been implemented. 212 of these were to be expected to be delivered in the remaining six months of 2017/18, leaving 2148 to be delivered during the Plan period. The delivery of these dwellings is an important source of supply and their implementation would contribute to meeting the housing requirement in the Borough. The Council has taken a cautious approach in placing reliance on the delivery of extant planning permissions, and recognises that some permissions will lapse or not be renewed and therefore, a 10% discount has been applied to planning permissions of less than 10 units. For proposals of 10 or more units where there are ten or more units remaining, officers have made a judgement using available intelligence to ascertain the likelihood of the scheme coming forward. After this exercise, a total of 1,888 units have been included as a source</p>	To update the sources of housing supply by adding more recent monitoring years.	MM

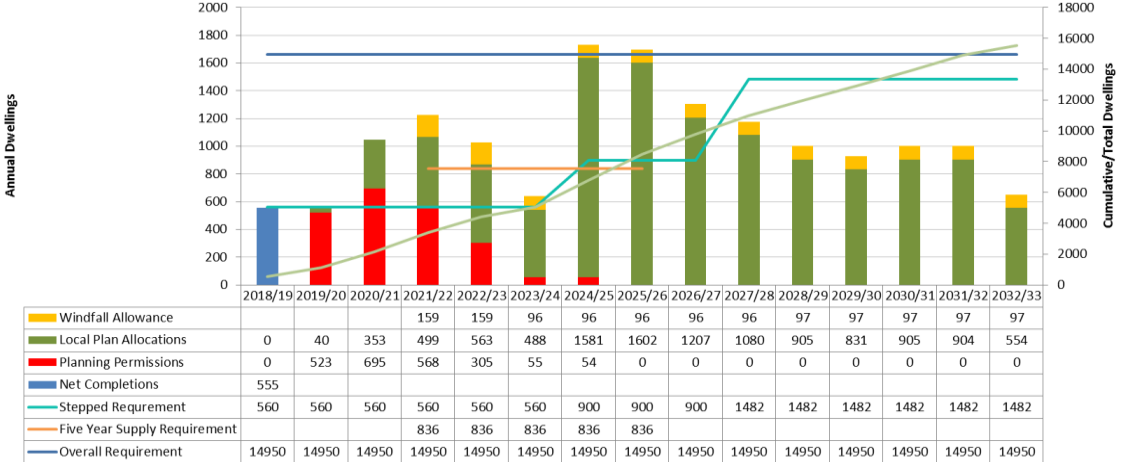
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		<p>of supply in meeting Calderdale's housing needs. These will be positioned in the housing trajectory using evidence from the SHLAA, and the assumptions made on lead in times and delivery rates discussed below.</p> <p>Windfall Sites - Windfall sites are those which have not been specifically identified as available. The NPPF states that these may be included as a source of supply if there is compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. The Council's justification for inclusion of a windfall allowance is set out in the Housing Technical Paper. Analysis of past windfall delivery and likely future trends has suggested the Council can include in its housing trajectory, a total of 1,294 units as a reliable source of housing delivery. No allowances are made for windfalls in the first three years as this could potentially lead to double counting with sites with planning permission. It is considered that 162 units will be delivered in years 4 and 5, and 97 units will be delivered each year between years 6 and 15. This equates to 10% of the housing requirement for Calderdale. The contribution from windfalls will continue to be monitored and will be reflected in the annual five year supply assessments.</p> <p>New Allocations - The remaining requirement is met through new land allocations. These are set out in Policy SD5 'Allocated Housing Sites'. Some of these allocations comprise of land allocations from the RCUDP.</p> <p>The following have not been included as a source of supply:</p> <p>Empty dwellings - At 25 April 2018, there were 1,782 long term empty dwellings (defined as empty for 6 months or longer) in the Borough. In more general terms, the number of empty properties in Calderdale is falling, and the Council through its Housing Service is actively pursuing initiatives to bring these back into residential use. However, many such properties can be difficult to bring back into residential use (as documented in the Council's Empty Homes Strategy 2010-2015 and reflected in the SHMA) and it is therefore difficult to quantify the contribution empty properties may make to delivering housing over the plan period and therefore a figure has not been included here for this source.</p>		

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		Demolitions - demolitions have generally been low in the past and no significant levels of demolitions are currently planned, therefore no allowance has been made.																																																					
38	Table 6.2	<p style="text-align: center;">Table 6.2: Sources of Housing Land Supply</p> <table border="1"> <thead> <tr> <th>-</th> <th>-</th> <th>Number</th> <th>Comments</th> </tr> </thead> <tbody> <tr> <td>A</td> <td>Housing Need (2018/19–2032/33)</td> <td>12,600</td> <td>15 years at 840 dwellings per year</td> </tr> <tr> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>B</td> <td>Sources of Supply</td> <td></td> <td></td> </tr> <tr> <td>-</td> <td>Extant planning permissions</td> <td>1,888</td> <td>Council's Housing Land Availability database, permissions up to 30.09.17</td> </tr> <tr> <td>-</td> <td>Windfalls</td> <td>1,294</td> <td>162 units delivered in Years 4 & 5, and 97 units per delivered each year thereafter</td> </tr> <tr> <td>-</td> <td>Sub total</td> <td>3,182</td> <td>-</td> </tr> <tr> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>C</td> <td>Number of dwellings required on new land allocations</td> <td>9,418</td> <td>Housing need minus extant planning permissions and windfalls</td> </tr> </tbody> </table> <p style="text-align: center;">Table 6.2: Housing Requirement and Sources of Supply</p> <table border="1"> <thead> <tr> <th></th> <th><u>Dwellings</u></th> <th><u>Notes</u></th> </tr> </thead> <tbody> <tr> <td colspan="3" style="text-align: center;">REQUIREMENT</td> </tr> <tr> <td><u>Housing Requirement 2018/19 to 2032/33</u></td> <td><u>14,950</u></td> <td><u>Stepped Trajectory*:</u> <u>560 x 6 years</u> <u>900 x 3 years</u> <u>1482 x 6 years</u> <u>(Annual Average 997)</u></td> </tr> <tr> <td colspan="3" style="text-align: center;">SOURCES OF SUPPLY</td> </tr> <tr> <td><u>Net Completions 18/19 (Year 1)</u></td> <td><u>555</u></td> <td><u>Gross completions less losses</u></td> </tr> </tbody> </table>	-	-	Number	Comments	A	Housing Need (2018/19–2032/33)	12,600	15 years at 840 dwellings per year	-	-	-	-	B	Sources of Supply			-	Extant planning permissions	1,888	Council's Housing Land Availability database, permissions up to 30.09.17	-	Windfalls	1,294	162 units delivered in Years 4 & 5, and 97 units per delivered each year thereafter	-	Sub total	3,182	-	-	-	-	-	C	Number of dwellings required on new land allocations	9,418	Housing need minus extant planning permissions and windfalls		<u>Dwellings</u>	<u>Notes</u>	REQUIREMENT			<u>Housing Requirement 2018/19 to 2032/33</u>	<u>14,950</u>	<u>Stepped Trajectory*:</u> <u>560 x 6 years</u> <u>900 x 3 years</u> <u>1482 x 6 years</u> <u>(Annual Average 997)</u>	SOURCES OF SUPPLY			<u>Net Completions 18/19 (Year 1)</u>	<u>555</u>	<u>Gross completions less losses</u>	To reflect revised housing requirement and additional land allocations, and updated sources of supply	MM
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38	Policy SD3	<p>Housing Requirement Provision is made for 12,600 additional dwellings to be delivered within Calderdale between 1st April 2018 and 31st March 2033, in order to meet the housing needs of the Borough.</p> <p>Policy SD3 Housing Requirement Provision is made for a <u>minimum</u> of <u>14,950 net</u> additional dwellings to be delivered within Calderdale between 1st April 2018 and 31st March 2033, in order to meet the housing needs of the Borough. <u>This housing requirement will be delivered in three periods:</u></p> <ul style="list-style-type: none"> <u>Period 1: 2018 - 2024 = 560 dwellings per annum</u> <u>Period 2: 2024 - 2027 = 900 dwellings per annum</u> <u>Period 3: 2027 - 2033 = 1,482 dwellings per annum</u> 	To reflect the revised housing requirement figure and provide clarification over the stepping of the housing trajectory	MM																					
38/39	Paras. 6.7 – 6.8	<p>6.7. <u>Given that the housing need for Calderdale is significantly higher than recent levels of delivery, it is considered appropriate to use a stepped requirement in the housing trajectory. Over the last ten years, net housing completions have averaged 451 dwellings per annum, with the lowest level of delivery of 289 units in 2016/17 and 2017/18. To meet current housing need, the borough would need a 86% increase in the level of housing delivery</u></p>	To fully explain the rationale behind the	MM																					

Page	Para/Table/ Box/Policy	Tracked change	Reasons for change	MM or Minor?
		<p>seen over the last ten years. Analysis of lead in times has shown that delivery on the allocations is unlikely to commence until Year 4, therefore the Council is reliant on planning permissions and allocations with permission delivering on site in the first three years of the Plan. Given the constrained land supply prior to adoption of the Plan, and the level of permissions coupled with recent housing delivery it is not considered realistic or achievable to meet the full housing need in the early years of the Plan. However, the trajectory shows that it is considered achievable to meet two-thirds of the annual housing need in the first three years, with the remainder met over the last 12 years of the Plan period.</p> <p>AMENDED 6.7 Given that the annual housing requirement is significantly higher in the Local Plan than the Replacement Calderdale Unitary Development Plan and the Regional Spatial Strategy there exists justification for a stepped housing trajectory. This approach reflects the level of completions in recent years, averaging 440 dwellings per annum over the ten year period 2009/10 to 2018/19, with only 309 units delivered in 2016/17 reducing to 294 units in 2017/18. Additionally, there are a number of strategic sites which will be delivered over a number of years later in the plan period. A stepped approach is consistent with previous plans with both the Regional Spatial Strategy and the Core Strategy Preferred Options taking this approach.</p> <p>NEW 6.7a The housing trajectory is therefore divided into three periods and consists of two distinct steps. A rate of 560 dwellings per annum (dpa) is employed for the first six years of the trajectory, followed by 900 dpa for the following three years, and 1,482 dpa for the subsequent 6 years. The figure of 560 dpa for the early part of the plan period is ambitious and represents a boost in housing delivery compared to general historic levels. Whilst the first year of the Local Plan (2018/19) saw a rise in completion levels to 555 dwellings net it cannot be assumed that this level will automatically be maintained. Setting the first period at this level in the early part of the plan period is ambitious but demonstrates the Council's commitment to delivery. Positioning the first step up, to 900dpa, at Year 7 (2024/25) both reflects the adopted date of the Local Plan (assumed to be 2021 for the trajectory) and demonstrates the Council's ambition to increase housing delivery. It assumes sites which cannot come forward prior to adoption of the Local Plan, such as those currently in the Green Belt, will start to deliver. The third step up in Year 10, to 1482 dpa, relies on these sites, along with the strategic sites, maintaining an increasing level of completion levels over the latter part of the Plan period.</p> <p>NEW 6.7b Sites in the housing trajectory are positioned based on the best site specific information available irrespective of the stepped approach along with the need to demonstrate a 20% buffer in</p>	stepped housing trajectory.	

Page	Para/Table/Box/Policy	Tracked change	Reasons for change	MM or Minor?
		<p>the five year housing land supply. It is not anticipated that all of these sites will be delivered at the point shown, since where there are sites in proximity it is normally the market which will determine the order in which they come forward, subject to any overriding infrastructure issues. Therefore there is not a direct correlation between the supply demonstrated in the trajectory and its delivery with supply in some years exceeding the equivalent requirement. This does, however, have the advantage of providing choice and flexibility. The trajectory does not represent a phasing of the requirement but reflects wider socio-economic factors and should therefore be viewed as a 'floor' and not a 'ceiling'.</p> <p>6.8 When demonstrating the Council can achieve a five year supply of deliverable sites, this will be based on the stepped requirement in any given five year period. Sites have been included in the trajectory in the first five years of the Local Plan because they either have full or reserved matters planning permission, have outline planning permission, are site allocations where assumptions regarding lead in times have been made or a house builder/agent has confirmed delivery of the site in the first five years, or are Council owned sites identified in a housing delivery programme.</p>		
40	Picture 6.1 and Table 6.3	<p>Calderdale Housing Trajectory 2018/19 – 2032/33</p> <p>Existing Housing Trajectory and Table 6.3: Refer to p40 of Publication Version of Local Plan</p> <p>Modified Trajectory and Table 6.3</p>	To reflect the revised housing requirement figure and illustrate the stepped housing trajectory including the updated sources of supply	MM

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	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33																																																																																																																					
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41	Table 6.4	<p data-bbox="936 1002 1144 1029" style="text-align: center;">Five Year Supply</p> <p data-bbox="790 1070 1290 1098" style="text-align: center;">Table 6.4: Five Year Supply Position 2018</p> <table border="1" data-bbox="488 1134 1592 1362"> <thead> <tr> <th></th> <th style="text-align: right;">Number</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">-</td> <td></td> </tr> <tr> <td>Housing Requirement (per annum)</td> <td style="text-align: right;">840</td> </tr> <tr> <td>Five Year Housing Requirement</td> <td style="text-align: right;">4200</td> </tr> <tr> <td>20% Buffer</td> <td style="text-align: right;">840</td> </tr> <tr> <td>Total Five Year Supply Requirement + 20% Buffer</td> <td style="text-align: right;">5040</td> </tr> <tr> <td>Annual Five Year Supply Requirement + 20% Buffer</td> <td style="text-align: right;">1008</td> </tr> </tbody> </table>		Number	-		Housing Requirement (per annum)	840	Five Year Housing Requirement	4200	20% Buffer	840	Total Five Year Supply Requirement + 20% Buffer	5040	Annual Five Year Supply Requirement + 20% Buffer	1008	To demonstrate the indicative 5YHLS position on adoption of the Local Plan taking account of the revised housing requirement figure, the stepping of the housing trajectory and the updated	MM																																																																																																																		
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		<p align="center"><u>Table 21: Five Year Housing Land Supply Calculation as at Adoption of LP April 2021</u> <u>Two Step (3 period) Trajectory (Liverpool/Residual Approach)</u> <u>2021/22 to 2025/26 (Years 4 to 8)</u></p> <table border="1"> <thead> <tr> <th></th> <th><u>Number</u></th> <th><u>Explanation/Source</u></th> </tr> </thead> <tbody> <tr> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td><u>Requirement</u></td> <td>-</td> <td>-</td> </tr> <tr> <td><u>Five Year Housing Requirement</u></td> <td><u>3480</u></td> <td><u>Revised Local Plan Policy SD3 following stage 1 hearings</u> <u>560 x 3 years and 900 x 2 years</u></td> </tr> <tr> <td><u>Gross Completions 18/19 to 20/21</u></td> <td><u>577</u></td> <td><u>Only 18/19 known when calculated</u></td> </tr> <tr> <td><u>Losses 18/19 to 20/21</u></td> <td><u>22</u></td> <td><u>Only 18/19 known when calculated</u></td> </tr> <tr> <td><u>Net Completions 18/19 to 20/21</u></td> <td><u>555</u></td> <td><u>Gross completions less losses for Year 1 (Y2 & 3 not known)</u></td> </tr> </tbody> </table>		<u>Number</u>	<u>Explanation/Source</u>	-	-	-	<u>Requirement</u>	-	-	<u>Five Year Housing Requirement</u>	<u>3480</u>	<u>Revised Local Plan Policy SD3 following stage 1 hearings</u> <u>560 x 3 years and 900 x 2 years</u>	<u>Gross Completions 18/19 to 20/21</u>	<u>577</u>	<u>Only 18/19 known when calculated</u>	<u>Losses 18/19 to 20/21</u>	<u>22</u>	<u>Only 18/19 known when calculated</u>	<u>Net Completions 18/19 to 20/21</u>	<u>555</u>	<u>Gross completions less losses for Year 1 (Y2 & 3 not known)</u>		
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		<u>Under Delivery Year 1 to 3</u>	<u>5</u>	<u>Requirement less delivery for Year 1. Not available for Years 2 & 3.</u> <u>Assumes full delivery for Years 2 and 3.</u>		
		<u>Under delivery as residual</u>	<u>2</u>	<u>Under Delivery Years 1 to 3 divided by 12 Years multiplied by 5. Assumes full delivery for Years 2 & 3.</u>		
		<u>Overall five year requirement</u>	<u>3482</u>	<u>Requirement + underdelivery as residual</u>		
		<u>20% Buffer</u>	<u>696</u>	<u>See HTP Section 7</u>		
		<u>Total five year requirement</u>	<u>4179</u>	<u>Requirement with underdelivery + 20% buffer</u>		
		<u>Annual five year requirement</u>	<u>836</u>	<u>Total requirement divided by 5 (rounded)</u>		
		<u>Supply</u>	-	-		
		<u>Planning permissions</u>	<u>2146</u>	<u>HLA 31st March 2019. See HTP Section 6 & Table 13 for discounting. Assumes same level of pps on adoption (Year 4)</u>		
		<u>Windfalls</u>	<u>608</u>	<u>Trajectory Years 4 and 5 = 159.4 x 2 + Year 6 to 8 =96.4 x3</u>		
		<u>Land Allocations</u>	<u>4733</u>	<u>Deliverable Years 4 to 8. HTP App 3.</u>		
		<u>Total Five Year Supply</u>	<u>7487</u>	<u>Sum of sources</u>		
		<u>Five Year Supply Figure</u>	-	-		
		<u>Number of Years Supply</u>	<u>8.96</u>	<u>Supply/5 Year Annual Requirement</u>		
NOTE: Whilst the full explanation behind the 5YHLS calculation is contained in the Housing Topic Paper some						

Page	Para/Table/Box/Policy	Tracked change	Reasons for change	MM or Minor?										
		amendments may be required to the reasoned justification in paras 6.9 to 6.11 of the Local Plan in order to ensure consistency between Table 6.4 and its supporting text. This will be addressed when the final modifications are drafted following receipt of the Inspector's final report.												
42	6.17	The target is within a range presented in the Employment Land Study and is identified to provide the number of jobs for Calderdale anticipated through the implementation of the policies adopted by the Local Economic Enterprise Partnership (LEP) for the Leeds City Region. There is an ambitious programme of infrastructure improvements to be delivered in Calderdale through the West Yorkshire Plus Transport Fund programme. The number of jobs planned for is consistent with the assessment that takes into account the benefits of employment generated from planned schemes.	Error	Minor										
42	6.18 <u>6.19</u>	Qualitative information of the demand for new employment indicates that there is a range in the size of industrial sites and premises required. There is a demand from micro businesses across the Borough for small units of up to 186m² (2000ft²), from SMEs for units up to 930m² (10,000ft²), and also for larger premises of over 4,650m² (50,000ft²). There is also a need to acknowledge and take into account a number of qualitative factors. Due to the nature of the borough and the characteristics of existing and potential industrial and commercial premises and sites, factors relating to the economy and local circumstances are also incorporated into the assessment of future requirement. For instance, evidence of the demand for new employment indicates that there is a range in the size of industrial sites and premises required. There is a demand from micro businesses across the Borough for small units of up to 186m ² (2000ft ²), from SMEs for units up to 930m ² (10,000ft ²), and also for larger premises of over 4,650m ² (50,000ft ²).	Clarification	Minor										
42	6.19 <u>6.18</u>	The quantitative assessment for the amount of new employment land required during the Plan period takes into account the amount of additional land needed to accommodate growth in employment, the need to replace existing employment land that is lost to other uses and the provision of additional land to provide a margin of flexibility to allow the market to respond to demand in the short term. Table 6.6 Requirement for New Employment Land	Clarification	Minor										
		<table border="1"> <thead> <tr> <th></th> <th>Hectares</th> </tr> </thead> <tbody> <tr> <td>Additional Land (net) to accommodate growth in employment (2016-2032)</td> <td>26.38</td> </tr> <tr> <td>Replacement of existing land/premises lost from employment uses (2016-2032)</td> <td>37.47</td> </tr> <tr> <td>Provision of flexibility and choice</td> <td>8.70</td> </tr> <tr> <td>Total</td> <td>72.54</td> </tr> </tbody> </table>		Hectares	Additional Land (net) to accommodate growth in employment (2016-2032)	26.38	Replacement of existing land/premises lost from employment uses (2016-2032)	37.47	Provision of flexibility and choice	8.70	Total	72.54		
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		<p>The net requirement for new floorspace is indicated in the table below</p> <p style="text-align: center;">Table 6.7 Floor space requirement</p> <table border="1"> <thead> <tr> <th>B-use</th> <th>(m2) (net)</th> </tr> </thead> <tbody> <tr> <td>Offices (B1/b)</td> <td>-30,062</td> </tr> <tr> <td>Manufacturing (B1c/B2)</td> <td>-40,594</td> </tr> <tr> <td>Distribution (B8)</td> <td>116,039</td> </tr> <tr> <td>Total (net)</td> <td>105,507</td> </tr> </tbody> </table>	B-use	(m2) (net)	Offices (B1/b)	-30,062	Manufacturing (B1c/B2)	-40,594	Distribution (B8)	116,039	Total (net)	105,507						
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43	6.21	<i>The starting point for the assessment of the future land requirement is the</i> forecast of changes in the number of jobs in the Borough over the plan period. <i>are the main factor in assessing the future land requirement.</i>	Clarification	Minor														
43	6.23	<p><i>Insert table 6.8 after text</i></p> <table border="1"> <thead> <tr> <th><u>Sector</u></th> <th><u>Jobs</u></th> </tr> </thead> <tbody> <tr> <td><i>Offices (B1/b)</i></td> <td><i>+2,043</i></td> </tr> <tr> <td><i>Manufacturing (B1c/B2)</i></td> <td><i>-1,657</i></td> </tr> <tr> <td><i>Distribution (B8)</i></td> <td><i>+932</i></td> </tr> <tr> <td><i>Total B class jobs</i></td> <td><i>+1,318</i></td> </tr> <tr> <td><i>Non B use class</i></td> <td><i>6,977</i></td> </tr> <tr> <td><i>Jobs in all sectors</i></td> <td><i>8,295</i></td> </tr> </tbody> </table>	<u>Sector</u>	<u>Jobs</u>	<i>Offices (B1/b)</i>	<i>+2,043</i>	<i>Manufacturing (B1c/B2)</i>	<i>-1,657</i>	<i>Distribution (B8)</i>	<i>+932</i>	<i>Total B class jobs</i>	<i>+1,318</i>	<i>Non B use class</i>	<i>6,977</i>	<i>Jobs in all sectors</i>	<i>8,295</i>	Clarification	Minor
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52	Policy SD5	<p>Allocated Employment Sites</p> <p>The following sites are allocated to provide land for employment purposes within use Classes B1, B2 and B8, and are indicated on the Policies Map.</p>	Correction - To enable consistency the Council is	Minor																																																																																																												

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		<p>Proposals within Use Classes B1, B2 and B8 will be permitted provided that the proposed development:-</p> <ol style="list-style-type: none"> 1. does not create any unacceptable impacts on the environment, amenity, safety, highway, or other relevant considerations; and 2. is not piecemeal development that would prejudice the comprehensive development of the site; and 3. is consistent with other relevant policies in the Local Plan. <p>Proposals for employment uses not within Use Classes B1, B2 and B8 will be resisted and only be supported in exceptional circumstances where the proposal is justified and complimentary (in terms of size and function) to Use Classes B1, B2, and B8.</p> <p><u>Planning Applications will need to address the issues identified in in Appendix 1.</u></p>	<p>amenable to including a requirement for planning applications to address issues identified Appendix 1, within the text of the Policy.</p>	
56	Policy SD6	<p>Allocated Mixed Use Sites</p> <p>The following sites are allocated to provide land for development of a range of mixed uses, and are indicated on the Policies Map.</p> <p>Proposals including a mix of the Use Classes specified will be permitted provided that the proposed development:-</p> <ol style="list-style-type: none"> 1. relates well in scale and character to the locality; and 2. does not create any unacceptable impacts on the environment, amenity, safety, highway, or relevant considerations; and 3. is not piecemeal development that would prejudice the comprehensive development of the site, and 4. is consistent with Policies for Retail and Town Centres, and other relevant policies in the Local Plan. <p>Proposals to develop a Mixed Use site for a single use, or which include a disproportionately high amount of a one particular use will only be permitted in exceptional circumstances. Such applications will need to be justified in terms of their non-suitability for mixed use development, or their contribution to the overall mix of uses in the local area, or their inclusion within a wider regeneration project where added benefits can be justified.</p> <p>Ancillary uses will also be acceptable providing that they are compatible with other proposed uses on site, and adjacent uses in the locality, and proposals must comply with the criteria (1-4) listed above. <u>Planning Applications will need to address the issues identified in in Appendix 1.</u></p> <p>NOTE: For the final consultation Modifications Document site status and capacities will need updating to reflect refinements to the details. The Mixed Use Study (once completed) will also need reflecting. Current site capacities can be found in Appendix 3 to the Housing Technical Paper (published March 2020). These are</p>	<p>Correction - To enable consistency the Council is amenable to including a requirement for planning applications to address issues identified in Appendix 1, within the text of the Policy.</p>	Minor

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		likely to be mainly minor modifications.		
59	Policy SD7	<p>Allocated Housing Sites</p> <p>The following sites are allocated to provide land for new housing, and are indicated on the Policies Map. Planning applications will need to address to the issues identified in the Site Assessment Reports <u>Appendix 1</u>. No other principal use will be permitted on allocated housing sites.</p> <p>NOTE: For the final consultation Modifications Document site status and capacities will need updating to reflect refinements to the details. Current site capacities can be found in Appendix 3 to the Housing Technical Paper (published March 2020. These are likely to be mainly minor modifications.</p>	Correction - To emphasise the link between the Policy and Appendix 1 to those preparing planning applications.	MM
70	Patra 10.2	<p>The UK Government is committed by the Climate Change Act 2008 to an 80% reduction in greenhouse gas emissions by 2050 from a 1990 baseline, <u>amended in 2019 to 'Net Zero'</u>. Calderdale Council, working with partners through the Energy Futures Panel <u>Climate Change Working Party</u> have <u>has</u> further refined the target to be more specific for the Borough and the information available. This used a 2005 base year resulting in the 2050 target being about 76% for Calderdale rather than the 80% established for the UK as a whole. <u>Using a base year of 2005 when data at a local authority level first became available and for the Local Plan period to 2032, ensuring compliance with a national reduction profile set by the Committee on Climate Change will require a reduction in the order of 60%. For the purposes of the Local Plan this will be used as the target for carbon reduction until such time as the Committee on Climate Change further revises its assessment or until another regionally or locally derived emissions reduction pathway is adopted by the Council. The reduction 'in the order of 60%' is calculated from interpreting the 2019 Climate Change Committee progress report using the BEIS Local Authority emission data for Calderdale.</u></p>	To reflect the decision of Cabinet 30 th September 2019, following a request by the Climate Change Working Party at its inaugural of 10 th September 2019, to reinsert a local carbon reduction target into the Local Plan that also meets the government's adopted net zero target.	Main
70	Policy CC1	Climate Change	To include	Minor

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	Bullet Point 8	<p>Development proposals should contribute to mitigating and adapting to the predicted impacts of climate change by:</p> <ul style="list-style-type: none"> Ensuring energy efficiency and reduced carbon emissions are regarded as priority outcomes in development planning; Using Sustainable Design and Construction methods, meeting national standards as a minimum; Increasing levels of Renewable and Low Carbon Energy Generation, through both a range of technologies and domestic, community and commercial scale schemes, whilst taking account of cumulative and environmental impacts; Supporting Sustainable Transport Networks through a reduction in travel demand, traffic growth and congestion; Locating development in areas accessible by public transport, and safe, attractive well linked cycling and walking routes, whilst recognising the different needs of rural areas Protecting and enhancing Green and Blue Infrastructure Networks, acknowledging the benefits these can bring; Minimising flood risk, limiting surface water run off; Creating, protecting and enhancing biodiversity habitats <i>including the wildlife habitat network</i>, taking care not to create barriers to the movement of wildlife over the wider landscape; Reducing the amount of waste produced through a reduction in the consumption of materials and resources and maximising the recycling/re-use of waste whilst minimising that going to landfill. 	specific reference to the wildlife habitat network as requested by Yorkshire Wildlife Trust.	
80	New para after para 10.40 (1040a)	<p>10.40a <i>Castle Hill, in Kirklees, is one of the most distinctive and prominent landscape features in the region. It is visible from a wide area and is a familiar and valued landmark. Victoria Tower, which lies on the south-western end of the hill top, accentuates this dramatic location and has become a key feature of the area's skyline. The visual connections between the site and the rural and urban areas around it are a fundamental aspect of its setting. In order to better understand the contribution which the area around the monument makes to its setting, in 2016 Kirklees Council commissioned a Study to examine the extent to which the significance of Castle Hill is derived from its setting. The 'Castle Hill Setting Study' makes it clear that the extensive wide-ranging views from the hilltops across the surrounding landscape are a critical component of Castle Hill's setting and notes, in particular, the potential harm which tall structures, such as wind turbines could have upon the setting of the monument. Wind turbine proposals, therefore, will also be expected to take into account their potential impacts upon Castle Hill.</i></p>	Addition requested by Historic England to highlight the need to protect the setting of Castle Hill	Minor
84	12.2	<p>Currently some of the key challenges facing Calderdale are:</p> <ul style="list-style-type: none"> that the population is set to increase - greatest in the over 65s and the 0 to 15 year-old age group; local economic growth has historically been constrained by a lack of viable land for development and a 	None currently but may need updating to	Minor

Page	Para/Table/Box/Policy	Tracked change	Reasons for change	MM or Minor?
		<p>highway network close to capacity;</p> <ul style="list-style-type: none"> • high dependence on the manufacturing, public and financial services sectors; 20% of children living in poverty; • a growing health gap between the average and most deprived areas, with those living in Calderdale's most disadvantaged communities experiencing greater ill-health than elsewhere in the Borough; and, • a similar gap in educational attainment between the most and least deprived areas. 	reflect latest population projections prior to adoption of the Local Plan	
87	HW5	<p>Sustainable Local Food Production</p> <p>All new residential developments with the exception of apartments and specialist accommodation shall include gardens or communal areas of adequate size, commensurate in scale with the development, to support household food production.</p> <p><u>Where practical developments of apartments or specialist accommodation should have some or all of pot/trough space, window box facilities, communal gardens at ground or roof level, pre-built raised beds, sensory gardens and children's play spaces.</u></p> <p>Furthermore all developers are encouraged to explore ways to incorporate food growing into landscaping schemes and the spaces around their developments.</p>	Extension of the Policy to include apartments and specialist accommodation	MM
93	Policy IM1	<p>Strategic Transport Interventions</p> <p>The following strategic transport infrastructure interventions are expected to be delivered through the plan period:</p> <ul style="list-style-type: none"> • A629 Corridor (M62 to Halifax, including Halifax town centre); • A641 Corridor / Brighouse Area Schemes; • <u>Cooper Bridge /A641 Highway Scheme (Kirklees led);</u> • A646/A6033; • A58/A672 Corridor (West of Halifax); • M62 Junctions 20 (Rochdale) to 25 (Brighouse) Smart Motorway; • Calder Valley railway electrification; • Calder Valley railway improvements (track and service infrastructure); • Elland Station; • Elland Access Package; • Halifax Station Gateway; • West Vale and Ainley Top Improvements; • Rochdale Canal Towpath Improvements; 	To reflect the outcome of the Kirklees Local Plan Examination confirming the delivery of the Cooper Bridge Scheme.	Minor

Page	Para/Table/Box/Policy	Tracked change	Reasons for change	MM or Minor?
		<ul style="list-style-type: none"> • Ryburn Valley Cycleway; • Hebble Trail Extension; • M62 Junction 26 Capacity Improvement; • Urban Traffic Control System Upgrade. <p>Potential interventions:</p> <ul style="list-style-type: none"> • A58/A6036 Corridor (East of Halifax); • A629 (Halifax to Bradford Boundary); • Hipperholme Station; • Cooper Bridge / A644 Highway Scheme (Kirklees led) • North Halifax Greenway; • M62 Junction 24a. • High Speed Rail 2; • Northern Powerhouse Rail. <p>It is likely that many among the schemes listed above will come forward to delivery across the life of the plan. All are considered priorities by The Council.</p> <p>Favourable consideration will be given to applications that support the delivery of these schemes.</p>		
102	IM6	<p>Telecommunications and Broadband</p> <p>Proposals for telecommunications development will be permitted where it can be demonstrated that: <i><u>The Policy does not establish any quantum or spatial distribution of telecommunications development across the Borough. Any telecommunications development proposals coming forward will be appropriately assessed and consider the following matters:</u></i></p> <ol style="list-style-type: none"> i. The siting and design of the equipment will not cause unacceptable harm to the character or appearance of the area <i>(including considerations relating to the South Penning Moors SPA and SAC)</i> or building on which it is located and will not have an unacceptable effect on the amenity of adjoining residential areas; ii. The special character and appearance of all heritage assets are preserved or enhanced; iii. The quality or special interest of any environmentally sensitive areas <i>(including considerations relating to the South Penning Moors SPA and SAC)</i> are not detrimentally or adversely affected; iv. It can be demonstrated that the equipment will meet the International Commission on Non-Ionising Radiation Protection (ICNIRP) guidelines on the limitation of exposure of the general public to electromagnetic fields; v. It has been demonstrated that mast or site sharing is not feasible and that the equipment cannot be sited on an existing building or other appropriate structure that would provide a preferable environmental solution; and 	To make the intent and extent of the Policy clear	MM

Page	Para/Table/Box/Policy	Tracked change	Reasons for change	MM or Minor?
		<p>vi. Consideration has been given to the future demands of network development, including that of other operators.</p> <p><i>Additionally:</i> All new housing and employment development should consider how the benefits of high speed broadband can be provided for future occupiers. Larger sites should facilitate provision of broadband, and plan for this as part of the strategic master plan for the site.</p>		
103	Policy IM7	In its summary response to the representations made to the Publication version of the Local Plan the Council did not propose any modifications in relation to Policy IM7. However, given the strategic level debate around the Garden Suburbs at the Stage 1 hearings the Council is mindful that modifications may arise during the Stage 2 hearings.	Potential future modifications?	
109	Policy EE1	<p>1. Land and premises within designated Primary Employment Areas</p> <p>i) Proposals to develop or redevelop land/premises for Employment uses <u>or Employment generating uses</u> within the Primary Employment Areas will be supported providing the following criteria are met:</p> <p>a. There is no unacceptable impact on the operation of established employment uses in the area, and</p> <p>b. There is no unacceptable impact on local amenity.</p>	Correction. Omission . Included to reflect the contribution of non B uses in generating and supporting employment in Primary Employment Areas.	MM
112	15.4	<p>Our town centres should therefore be supported in every possible way to help them thrive, to enable the retention of expenditure locally and to increase footfall both day and night. The Local Plan must ensure that Calderdale's centres remain vibrant and dynamic places to visit, through the period of the Plan and beyond. With this in mind, the following suite of policies will apply:</p> <ul style="list-style-type: none"> • Calderdale Retail Hierarchy and Town Centre Uses; • Shopping Frontages; • Sequential Test and Retail Impact Assessments; • General Town Centre Principles; • Cultural and Leisure Provision; and • Residential Use in Town Centres. 	Impact Assessments need to be also undertaken on leisure and office proposals.	Minor
116	Title	Sequential Test and Retail Impact Assessments	Impact Assessments need to be also	Minor

Page	Para/Table/Box/Policy	Tracked change	Reasons for change	MM or Minor?
			undertaken on leisure and office proposals.	
116	15.11	Local Plan policy needs to reflect the NPPF in requiring that the sequential approach to site selection is followed. Where proposed developments for main town centre uses are being considered for sites that are not in an existing centre or not in accordance with an allocation within the plan, there is a policy requirement that applications for main town centre uses be located <i>firstly</i> in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. If the proposal is not located within a town centre an impact assessment will be required.	Word added to improve clarity	Minor
116	15.12	The NPPF allows local authorities to set local thresholds for retail impact assessments, and these are set out in the policy below. Each centre in Calderdale will have different sensitivities to new development, therefore this plan proposes local thresholds are set using the Retail Study 2016 where the key consideration is the quantitative assessment of retail needs and the need for new convenience and comparison floorspace within each of the defined centres.	Impact Assessments need to be also undertaken on leisure and office proposals.	Minor
117	15.14	The analysis for the defined centre's sales density and health check assessment has been weighted equally. The Retail Study 2016 has considered the size of the town and district centres and depending on the analysis, each town centre has been given a locally set retail impact threshold of between 1,000 sq. m gross and 1,750 sq. m gross. Each district centre has been given a locally set retail impact threshold of between 250 sq. m gross and 500 sq. m gross. Halifax town centre is significantly larger than the other town and district centres in the Borough with a turnover far greater than the other defined centres combined. The health check assessment of Halifax has found that the town centre is performing well and is not vulnerable to development outside of the town centre. There are no retail commitments close to the Halifax town centre boundary. For these reasons it is not proposed that Halifax has a locally set retail impact threshold for development proposals outside of the town centre boundary.	Impact Assessments need to be also undertaken on leisure and office proposals.	Minor
117	15.15	It is for retail impact assessments submitted as part of any planning application to define an appropriate catchment area, or other submission material in the absence of a RIA. The catchment area will dictate the centres that should be considered in the context of the sequential approach and impact tests. Where a catchment area extends across a number of centres, the need or otherwise for an impact assessment must have regard to the thresholds for each centre.	Impact Assessments need to be also undertaken on leisure and office proposals.	Minor
117/118	Policy RT3	Sequential Test and Retail Impact Assessments Sequential Test - Where the proposals <i>come forward for main town centre uses which are</i> is-outside <i>one</i> of the defined centres <i>boundaries</i> , all town centre uses will be subject to a Sequential <i>Test</i> approach to development	Impact Assessments need to be also	MM

Page	Para/Table/Box/Policy	Tracked change	Reasons for change	MM or Minor?												
		<p><i>will be required.</i> This will test requires applications for <i>that all</i> town centre uses to be located firstly in town <i>defined</i> centres, then edge of centre locations, and only if suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference will be given to accessible sites that are well connected to the town <i>a defined</i> centre. Applicants will have to provide evidence there are no reasonable prospects of the proposed development being accommodated on an alternative town centre site(s) demonstrating a reasonable degree of flexibility about the scale, format and design of the development and the provision of car parking.</p> <p>Edge of centre is defined as:</p> <ul style="list-style-type: none"> • For all retail (Use Class A1) purposes, a location that is well connected and up to 300 metres of the Primary Shopping Area; • For all main town centre uses, a location within 300 metres of a town centre boundary. <p>Out of centre is defined as anything beyond the edge of centre.</p> <p><i><u>For all retail (Use Class A1) proposals the boundary will be the Primary Shopping Areas; for all other main town centre uses, and in circumstances where no Primary Shopping Area is defined, the boundary will be the defined town centre boundary. Edge-of-centre and Out-of-centre is defined in the NPPF</u></i></p> <p>Retail Impact Assessments and Local Thresholds - Proposals for main town centre uses on the edge or outside of a defined centre will have to demonstrate that there would not be significant adverse impact on the delivery of existing, committed, and planned public and private investment or on the vitality and viability of any existing centre.</p> <p>Main town centre proposals located on the edge or outside of a defined centre will be subject to a retail impact assessment if they exceed the following floorspace thresholds:</p> <p style="text-align: center;">Impact Assessment Thresholds on New Gross Floorspace</p> <table border="1" data-bbox="427 1082 1653 1302"> <thead> <tr> <th data-bbox="427 1082 1131 1118">Centre</th> <th data-bbox="1131 1082 1653 1118">Retail Proposals (sq.m. Gross)</th> </tr> </thead> <tbody> <tr> <td data-bbox="427 1118 1131 1155">Halifax</td> <td data-bbox="1131 1118 1653 1155">2,500 (NPPF default)</td> </tr> <tr> <td data-bbox="427 1155 1131 1192">Elland, Sowerby Bridge and Todmorden</td> <td data-bbox="1131 1155 1653 1192">1,750</td> </tr> <tr> <td data-bbox="427 1192 1131 1228">Brighouse and Hebden Bridge</td> <td data-bbox="1131 1192 1653 1228">1,500</td> </tr> <tr> <td data-bbox="427 1228 1131 1265">King Cross, Mytholmroyd and Ripponden</td> <td data-bbox="1131 1228 1653 1265">500</td> </tr> <tr> <td data-bbox="427 1265 1131 1302">Hipperholme, Queens Road, West Vale</td> <td data-bbox="1131 1265 1653 1302">250</td> </tr> </tbody> </table> <p>The assessment should consider the following impacts on all centres located within the anticipated catchment area of the new development:</p>	Centre	Retail Proposals (sq.m. Gross)	Halifax	2,500 (NPPF default)	Elland, Sowerby Bridge and Todmorden	1,750	Brighouse and Hebden Bridge	1,500	King Cross, Mytholmroyd and Ripponden	500	Hipperholme, Queens Road, West Vale	250	undertaken on leisure and office proposals.	
Centre	Retail Proposals (sq.m. Gross)															
Halifax	2,500 (NPPF default)															
Elland, Sowerby Bridge and Todmorden	1,750															
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Hipperholme, Queens Road, West Vale	250															

Page	Para/Table/ Box/Policy	Tracked change	Reasons for change	MM or Minor?
		<ul style="list-style-type: none"> • all relevant impacts set out in national planning policy; • likely effects of development on any town centre strategy • whether the proposal is of an appropriate scale in relation to the size, role and character of the settlement or intended catchment area; • the cumulative impact of the proposal and other similar outstanding permissions or recent completions; • where the catchment area of the proposed development includes a Calderdale markets location, the specific predicted impact on market trading; and • for major applications the above impacts should be assessed 10 years from the time the application is made. <p>All applications to existing Class A1 stores and applications to vary the range of goods permitted to be sold from existing floorspace in out-of-centre retail warehouse locations should undertake an impact assessment.</p> <p>Where any proposal fails to satisfy the sequential test or is likely to have a significant adverse impact on a defined centre it will be refused.</p>		
118	Table 15.3	Monitoring: Policy RT1, RT2 and RT3 - Calderdale Retail Hierarchy and Town Centre Uses; Primary Shopping Areas and Shopping Frontages; and Sequential Test, Retail Impact Assessments and Local Thresholds	Impact Assessments need to be also undertaken on leisure and office proposals.	Minor
121	Policy RT6	<p>Cultural and Leisure Provision</p> <p>Major new development and large-scale investment, particularly in mixed use schemes, should seek to enhance cultural provision in the Borough.</p> <p>Where new facilities are proposed, the use of space for both performing arts and exhibition space should be considered as an integral element of the design.</p> <p>New development for cultural provision should seek to ensure that local participation and audience development is enhanced across the Borough.</p> <p>Cultural and leisure proposals in the town centre which meet the following criteria will be permitted where: i.the development, including in combination with any similar uses in the locality, does not have a significant impact on local amenity, including as a result of noise and hours of operation; and</p>	Correction - strengthens the policy to ensure leisure and cultural provision is accessible to all.	MM

Page	Para/Table/Box/Policy	Tracked change	Reasons for change	MM or Minor?						
		<p>ii.the proposal establishes or retains an ‘active frontage’ to the street.</p> <p>The loss of existing cultural and leisure provision to other uses will be resisted unless:</p> <ul style="list-style-type: none"> •replacement facilities are provided in the local area; or •it can be clearly demonstrated that the facility is <i>no longer required by the community and is no longer</i> not viable, and the local community have been given adequate opportunity to manage the asset. 								
124	Table 16.1	<table border="1"> <tr> <td>Outcomes</td> <td>Planning permissions for non-allocated sites accord with the criteria in the Policy</td> </tr> <tr> <td>Indicators</td> <td>Contribution of non-allocated sites to housing supply Proportion and number of sites that are windfalls</td> </tr> <tr> <td>Targets</td> <td>None specifically (although non-allocated sites along with other sites will contribute to a windfall allowance)</td> </tr> </table>	Outcomes	Planning permissions for non-allocated sites accord with the criteria in the Policy	Indicators	Contribution of non-allocated sites to housing supply Proportion and number of sites that are windfalls	Targets	None specifically (although non-allocated sites along with other sites will contribute to a windfall allowance)	Duplicates the other monitoring indicator	Minor
Outcomes	Planning permissions for non-allocated sites accord with the criteria in the Policy									
Indicators	Contribution of non-allocated sites to housing supply Proportion and number of sites that are windfalls									
Targets	None specifically (although non-allocated sites along with other sites will contribute to a windfall allowance)									
130	Para. 16.36	<p>The SHMA has calculated the need for affordable housing in Calderdale, incorporating both current and future need, balanced against supply. For the period considered in the study, it has identified a need for 3,819 affordable homes between 2012-33, equating to an annual average of 182 affordable homes. Over the 19 year plan period (2016 – 2035), the calculation suggests that 3,671 affordable homes could be needed in Calderdale, equating to circa 193 affordable homes per annum on average.</p>	Error – Text different in the online version to the printed document Doc correct Web incorrect	Minor						
130	Para. 16.37	<p>In line with nPPG, the Council should aim to deal with undersupply within the first five years of the plan period where possible, as such the SHMA identified a need to provide 527 affordable homes annually over the next five years, in order to clear the backlog that has arisen historically while meeting newly arising needs over this period and 74 affordable homes per annum thereafter. However, the Council's monitoring indicates that affordable housing delivery has slowed in Calderdale in recent years. Since 2012, an average of 97 affordable homes have been completed each year in the Borough. To clear the backlog and current need for affordable housing, a significant increase in housing delivery would be required in the first five years of the Plan period, and is not considered to be realistic. <i>However, the Council considers that affordable housing needs can be met during the Plan period.</i></p>	Error – Text different in the online version to the printed document Doc incorrect Web Correct	Minor						
132	Para. 16.54	<p>Rural exception sites are one way of balancing the protection of rural areas with meeting housing need. The type of housing provided <i>should be</i> appropriate in size and price to meet local need. Careful planning and preparation beforehand <i>to</i> ensures the development is sustainable <i>will be required</i>. <i>Proposals with the potential to affect the</i></p>	To comply with the advice of Natural England	MM						

Page	Para/Table/Box/Policy	Tracked change	Reasons for change	MM or Minor?
		<p><i>South Pennine Moors (phase 2) Special Protection Area/Special Area of Conservation will be required to demonstrate overriding public interest in line with the Habitats Regulations, in order to avoid any adverse impacts on this Natura 2000 site.</i></p>	<p>and the recommendations of the HRA.</p>	
133	Policy HS6	<p>Affordable Housing</p> <p>The Council will not require an inclusion of an element of affordable homes in housing developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1,000 square metres (gross internal area).</p> <p>The Council will expect details of the affordable housing mix to be provided in a statement of Affordable Housing Contribution to be informed by the most recent SHMA, together with Council's published guidance on affordable housing provision.</p> <p>In some instances, the proportion may be less than that prescribed in Table 16.6 where robust viability evidence demonstrates that there are development costs which would otherwise prejudice the implementation of the proposal. For any deviation from the stated requirements, the Council will take account of the most recent evidence, such as the SHMA and any subsequent updates or other relevant and recent information.</p> <p>The affordable homes should be incorporated within the development but where justified, a financial contribution of at least equal value may be accepted to provide affordable homes elsewhere or to re-use or improve the existing housing stock.</p> <p>Planning applications which include proposals for affordable housing must ensure that there are secure and practical arrangements to retain the benefits of affordability for initial and subsequent owners and occupiers, such as the involvement of a registered provider and where appropriate by the use of conditions or planning obligations.</p> <p>The affordable housing provision should be indistinguishable from market housing in terms of achieving the same high quality of design.</p> <p>In the western part of the Borough as defined by that part of the Borough which is parished, permission will be granted exceptionally for affordable housing on 'exception sites' where policies to protect the countryside would normally preclude planning permission being granted provided that:</p> <ol style="list-style-type: none"> 1. there is a proven local need for affordable housing in the particular settlement; 2. residential development would reflect the principles of sustainable development including the objective 	<p>To comply with the advice from Natural England to ensure that proposals on 'exception sites', comply with other Local Plan policies, including those which may affect the South Pennine Moors (phase 2) Special Protection Area/Special Area of Conservation.</p>	MM

Page	Para/Table/Box/Policy	Tracked change	Reasons for change	MM or Minor?
		<p>of maintaining or enhancing the vitality of the particular rural community;</p> <p>3. there are secure arrangements in place to ensure that the affordable housing units remain affordable in perpetuity;</p> <p>4. there are secure arrangements in place to ensure that the affordable housing units are offered to local people in the first instance; and</p> <p>5. the site is within or immediately adjacent to a settlement listed in Map 16.2; <i>and</i></p> <p>6. <u>the proposal complies with other relevant Local Plan policies.</u></p>		
135	Table 16.7	Number of Affordable Homes as per SHMA- 202 per annum (2016-2033)	Error – Text different in the online version to the printed document. Doc correct Web incorrect	Minor
137	Para. 16.61	<p><u>New Paragraph 16.1a</u></p> <p><u>For the purpose of criterion i of Policy HS8 the starting point is that need is equivalent to 7 pitches as determined in the Study but the accommodation circumstances of those seeking pitches will also be taken into account at the time of a planning application in order that decisions comply with the current definition of need as set out in Annex 1 to “Planning Policy for Traveller Sites” (DCLG, 2015). In its Local Development Scheme the Council states its intention to bring forward a Development Plan Document (DPD) upon adoption of the Local Plan in order to address the needs of Gypsies and Travellers and Travelling Showpeople. As part of the preparation of this document evidence of need will be refreshed in order to ensure that the DPD is based on the most up-to-date evidence and employing the most recent definition of gypsies and travellers. Provision will be made for an allocation(s) if such a requirement is supported by the evidence on need. This evidence, including any further updates, will also be used to determine planning applications against criterion i of Policy HS8.</u></p> <p>Paragraph 16.62</p> <p>The Study also examined the need for transit accommodation based on data relating to unauthorised encampments. Analysis of this data indicates that new transit provision of six transit pitches be made with particular consideration to the Brighouse, Elland and Halifax areas since it is these areas that</p>	To provide clarification for Policy HS8 (i) including consequential changes to subsequent paragraphs 16.62 and 16.65	MM

Page	Para/Table/Box/Policy	Tracked change	Reasons for change	MM or Minor?
		<p>have experienced the highest levels of unauthorised encampment activity. The study did not consider that the current level of activity will alter significantly over future years beyond 2018/19. Whilst the assumption is that each transit pitch would accommodate one caravan, established practice within the Travelling community means that pitches could accommodate up to two vans if the pitch is being occupied by the same household or member of a family group. However, the need for transit pitches is not well supported by survey findings that show that three quarters of respondents felt that there was not a need for new transit pitches across the study area. The Study also recommended consideration be given as to whether the most appropriate type of provision would be a conventional formal transit site or a form of authorised 'stopover' or negotiated stopping provision. <u>As with provision for permanent sites, as set out above, when assessing any planning applications for transit sites against criterion i of Policy HS8 the most recent evidence will be used.</u></p> <p>Paragraph 16.65 Whilst Policy HS8 sets out how planning applications for sites to accommodate Gypsies and Travellers and Travelling Showpeople will be assessed, this Local Plan does not include any further provision to meet their needs and a separate Development Plan Document (DPD) will be brought forward upon adoption of the Local Plan to address this issue.</p>		
137/138	Policy HS8 (iii)	<p>Criterion iii: <u>The development creates no unacceptable environmental, amenity, traffic, safety or other problems;</u> the site will have minimal impact upon the environment and the surrounding areas, particularly nearby residential areas;</p>	To ensure consistency with Policy HS1 (vi) (Non Allocated Sites)	Minor
137	Policy HS8 (viii)	<p>Criterion viii: <u>The site is sustainably located with regard to</u> schools and other community facilities including health services are easily accessible from the site;</p> <p>Paragraph 16.63: "...Sites also need to be located sustainably and therefore within a reasonable distance of local services and facilities such as shops, hospitals and schools (so that children can attend school on a regular basis)." <u>Sites also need to be located sustainably with accessibility to services and facilities by good quality public transport, cycling and walking. For the purpose of Policy HS8, walking distance to public transport is taken as within 400m of a bus stop on a high frequency</u></p>	To ensure consistency with HS1 (Non Allocated Sites) and thereby between the settled and travelling	Minor

Page	Para/Table/Box/Policy	Tracked change	Reasons for change	MM or Minor?
		<p><i>bus route or 800m of a railway station; access to local services such as convenience shops, post offices, health centres/surgeries and primary schools (so that children can attend school on a regular basis) should be no more than a 15 to 20 minute public transport journey. * It will be important to consider the individual circumstances of each site, including matters such as topography and the amenity and general safety of any route.</i></p> <p><i>Footnote: * Site Allocations Assessments Methodology, CMBC</i></p>	populations.	
137	Policy HS8 (ix)	<p>Criterion ix: Development of the site conserves or enhances any heritage asset and will not harm those elements which contribute to its significance, including its setting, where this is a material consideration, <u>as set out in Policy HE1 (Historic Environment)</u>;</p> <p>Paragraph 16.63 ...Other sensitive locations must also be protected as should local amenity and the environment generally. <u>This includes heritage assets and their settings and is a statutory requirement in the National Planning Policy Framework which requires the impact on the historic environment to be evaluated and development preserve or enhance any heritage asset and not harm those elements which contribute to its significance, including its setting, where this is a material consideration.. These requirements are set out in greater detail in Policy HE1 (The Historic Environment) of this Local Plan and is an approach is supported by Historic England.</u> Sites also need to be located sustainably and therefore within a reasonable distance of</p>	<p>To ensure consistency with Policy HE1 (Historic Environment)</p> <p>Par 16.63 is modified to draw attention to this requirement.</p>	Minor
137	Policy HS8 (xi)	<p>Criterion xi: The site is not located in Flood Zone 3 <u>and if located in Flood Zone 2 the requirements of the Flood Risk Sequential and Exception Tests are met;</u></p>	To comply with the advice of the Environment Agency	MM

Page	Para/Table/Box/Policy	Tracked change	Reasons for change	MM or Minor?
137	Policy HS8 (xiv)	Criterion xiv: The site complies with the locational criteria for development elsewhere in the Local Plan.	Criterion superfluous as location in terms of Green Belt is covered under criterion ii and sustainable locations are addressed under the amended criterion (viii)	Minor
137	Policy HS8 (v)	Criterion v: A scheme has been provided to ensure that any historic ground contamination can be managed safely; New criterion (to be positioned at the end of the list of criteria): <u>The site complies with other relevant Local Plan policies</u>	Criterion superfluous as creates duplication with Policy EN3 (Environmental Protection). New criterion highlights relevance of other Local Plan Policies	Minor
140	Para 17.18	3. Sustainability – at the heart of sustainable design and construction is the aspiration of creating buildings that meet the needs of building users and the wider community whilst avoiding or reducing the harmful impacts associated with the construction and operation of the building. The need to facilitate the transition to a low carbon future in a changing climate is cited as a core principle of the NPPF, <u>including through the location, orientation and design of development.</u>	Clarification	Minor

Page	Para/Table/Box/Policy	Tracked change	Reasons for change	MM or Minor?
140	Para 17.20	The use of the principles associated with Passive Solar Design and applying construction standards such as Passivhaus and EnerPHit Standard could be useful in helping to address sustainability and climate change, whilst consideration of resilience in potential flood risk areas can help reduce risk and contribute to the delivery of more sustainable development. Whilst the Government has abandoned the principles of "Zero-Carbon Homes" from 2016, achieving zero-carbon is still an overarching aspiration in order to meet the legally binding carbon reductions by 2050. The possibility of encouraging greater sustainability in the provision of new dwellings in particular is an aspiration of the Council, which will mean that homes do not have to be retrofitted at a later date. The Energy Savings Trust (May 2017) have released "The Clean Growth Plan : A "2050-ready" new build homes policy". This approach, whilst not Government policy, is worthy of consideration in Calderdale in order to help the borough meet the obligations that apply in facilitating the national 80% reduction in greenhouse gas emission by 2050, and the 75.8% <u>60%</u> reduction that Calderdale will need to achieve. The initial additional cost can be quite a small percentage of construction costs so the pay back period can be quite short, given that significant savings in energy costs can be achieved.	To ensure compliance with modified para. 10.2	Minor
141	Para. 17.22	The Deregulation Act <u>2015</u> has made a significant change to the Planning and Energy Act 2008, by removing <u>amending</u> the clause which enabled Local Authorities to establish any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings. The introduction of a new simplified Technical Housing Standard to be incorporated into the Building Regulation regime has established standards for water consumption, energy, accessibility, security and space. Local Authorities must now demonstrate the evidence for, and justify, energy standards above those in the current Building Regulations. However, this is an evolving area with further changes to be introduced as part of the Future Homes Standard and which will require a significant step up in energy efficiency standards for dwellings, from those currently required by Part L of the Building Regulations.	Update reflecting latest Government approach	Minor
141	17.27	In addition to design review, a number of design tools are available to help evolve and assess the design elements of proposed new developments as listed below. <i>General Design Guidance</i> <ul style="list-style-type: none"> National Planning Practice Guidance: Design; National Planning Policy Framework: Requiring Good Design; 	Addition of further background information	Minor

Page	Para/Table/Box/Policy	Tracked change	Reasons for change	MM or Minor?
		<ul style="list-style-type: none"> • <i>National Planning Policy Framework: Climate Change;</i> <p><i>Homes and Neighbourhood</i></p> <ul style="list-style-type: none"> • Technical Housing Standards Review (2015); • Building for Life 12; • Making Places: The Quality Design Guide; • Secured by Design: New Homes 2014; <p><i>Public Realm</i></p> <ul style="list-style-type: none"> • Manual for Streets; • Street Design for All; <p><i>Transport</i></p> <ul style="list-style-type: none"> • Planning for Public Transport in Developments; • Bus Stop Toolkit; <p><i>New Buildings</i></p> <ul style="list-style-type: none"> • Design Quality Indicators; • BREEAM (BRE Environmental Assessment Method); • Home Quality Mark; • Secured by Design: Commercial Developments 2015; 		
		<p>NOTE: The above section (17.18 – 17.27) will be updated further to reflect the latest position including the outcome of the consultation on the Future Homes Standard and reference the RLC Technical Paper.</p>		
142	Policy BT1	<p>3. Sustainability</p> <p>(a) All new residential development (including conversions and extensions) will be expected to incorporate sustainable design and construction principles throughout the development process in line with the Government’s objective of setting energy standards through the Building Regulations function. In addition, residential development proposals will be encouraged to:</p>	Change of emphasis for criterion i and inclusions of new criterion ii (reflecting emerging	Main

Page	Para/Table/Box/Policy	Tracked change	Reasons for change	MM or Minor?
		<p>i. Consider <u>Incorporate</u> the principles associated with Passive Solar Design in the design and layout of development, and to facilitate the provision of "2050-ready" homes;</p> <p>ii. <u>Incorporate fabric standards, heating technology and energy generation that facilitate the emerging Future Homes Standard</u></p> <p>iii. Incorporate the use of recycled and energy efficient materials;</p> <p>iv. Maximise the reuse of existing resources and materials to minimise waste and the loss of embodied energy associated with the production of building materials and products; and</p> <p>v. Incorporate the use of locally sourced building materials.</p> <p>(b) All new non-residential development in excess of 1000sqm will be expected to meet at least BREEAM level 'very good' with immediate effect, with an aspiration for higher BREEAM standards, subject to review over the plan period to ensure the target remains relevant.</p>	Government approach)	
145	Policy BT3	Landscaping schemes should ensure that new development integrates appropriately into its surroundings, contributes to the character of the area, and enhances local biodiversity if practicable in accordance with Local Plan Policy GN3 – Natural Environment.	Request of conservation officer to ensure NPPF compliance on Biodiversity Net Gain.	Minor
151	18.2	<p>The historic environment includes architectural, archaeological^{<u>Footnote</u>} and artistic features, some of which are designated assets including:</p> <ul style="list-style-type: none"> •Conservation Areas; •Listed Buildings; •Registered Historic Parks and Gardens; and •Scheduled Ancient Monuments. <p><u>Footnote Scheduled Ancient Monuments are designated heritage assets and are Class I archaeological sites for the purpose of the Local Plan. Class II sites are undesignated heritage assets of regional importance which have been identified as warranting preservation in situ. Class III sites are those whose importance has not yet been assessed. Details of all sites are held in the West Yorkshire Historic Environment Record</u></p>	Clarification – explanation of "archaeological"	Minor
151	18.3	In addition, the historic environment of Calderdale also includes non-designated heritage assets - those which, though not formally designated, have been identified as having positive heritage value. Non-designated heritage assets can be identified through the West Yorkshire Historic Environment Record, the West Yorkshire Historic Landscape Characterisation, or by the Local Planning Authority (such as during assessment of development	Correction – to reflect the 2019 NPPF	Minor

Page	Para/Table/Box/Policy	Tracked change	Reasons for change	MM or Minor?
		<p>proposals, <i>Conservation Area Character Appraisals and Management Plans</i>, or through developing a Local List). <i>Developers are encouraged to consult with these resources to establish the likelihood of their proposals affecting a heritage asset.</i></p>		
152	Policy HE1	<p>The Historic Environment</p> <p>Development proposals should conserve, and where appropriate, enhance, the historic environment especially those elements that make a particularly important contribution to the identity, sense of place and local distinctiveness of Calderdale. These include:-</p> <ul style="list-style-type: none"> •Calderdale's textile/industrial heritage and landscapes; •Yeoman Houses; •Non-conformist chapels and graveyards; •Historic farmsteads and barns; and •Civic buildings. <p>Applications for development which are likely to affect the significance of a heritage asset (whether designated or not) will be required to include an appropriate understanding of the significance of the assets affected. Where it is necessary to understand the impact of the proposals upon the heritage asset, this should also be accompanied by a Heritage Impact Assessment or, in the case of archaeological remains, an appropriate archaeological assessment.</p> <p>Development proposals will be expected to conserve heritage assets in a manner appropriate to their significance. Harm to a designated heritage asset (or a Class II archaeological site) will only be permitted where this is outweighed by the public benefits of the proposal. Substantial harm or total loss to the significance of a designated heritage asset (or a Class II archaeological site) will only be permitted in exceptional circumstances where there is a clearly defined public benefit which outweighs the harm.</p> <p><i><u>Proposals affecting a Class III archaeological site should conserve those elements which contribute to its significance in line with the importance of the remains. In those cases where development affecting such any archaeological sites is acceptable in principle, mitigation of damage will be ensured through preservation of the remains in situ as a preferred solution. When in situ preservation is not justified, the developer will be required to make adequate provision for recording and analysing the remains, interpretation of the results gained, public dissemination of the results, and deposition of the resulting archive with an appropriate museum or archive service.</u></i></p>	Correction – More logical order of the Policy.	Minor

Page	Para/Table/ Box/Policy	Tracked change	Reasons for change	MM or Minor?
		<p>Proposals affecting a conservation area or its setting should preserve or enhance those elements that contribute to its significance particularly those buildings, spaces or structures making a positive contribution to its character. Regard should be given to Conservation Area Character Appraisals where one exists.</p> <p>Support will be given to development proposals which will help to provide a sustainable future for a heritage asset at risk, providing that other elements of this Policy are complied with.</p> <p>Proposals affecting a Class III archaeological site should conserve those elements which contribute to its significance in line with the importance of the remains. In those cases where development affecting such sites is acceptable in principle, mitigation of damage will be ensured through preservation of the remains in situ as a preferred solution. When in situ preservation is not justified, the developer will be required to make adequate provision for recording and analysing the remains, interpretation of the results gained, public dissemination of the results, and deposition of the resulting archive with an appropriate museum or archive service.</p> <p>Proposals that are within or likely to affect the setting of a locally-important Historic Park and Garden will be expected to: ensure that development does not detract from the enjoyment, layout, design, character, appearance or setting of the Park or Garden, key views out from the Park, or prejudice its future restoration</p>		
157	Policy GN1	<p>Securing green infrastructure provision</p> <p>The Council will put mechanisms in place to secure Green Infrastructure provision in the Borough, <i>in part to help avoid increased recreational disturbance on the South Pennine Moors SAC and SPA.</i></p> <p>To achieve this, the primary focus will be on:</p> <ul style="list-style-type: none"> • Improving and enhancing existing Green Infrastructure assets, and/or expanding existing, or creating new, Green Infrastructure assets; • Encouraging the protection, enhancement and creation of Green Infrastructure through the Development Management System; • Encouraging partnership delivery of Green Infrastructure in the Borough; and • Making good deficiencies in quantity and quality of Green Infrastructure by a range of means including developer contributions. <p>New development must be served by Green Infrastructure to meet the needs of the prospective residents in a manner which will contribute to the creation of a high quality environment and provide access to high quality open space for leisure and recreational purposes. Development proposals should ensure that:</p> <ul style="list-style-type: none"> • The Green Infrastructure function of the land is retained and where possible improved; • The opportunity is taken to extend and increase Green Infrastructure by linking green spaces and water 	Request of conservation officer for clarification purposes.	Minor

Page	Para/Table/Box/Policy	Tracked change	Reasons for change	MM or Minor?
		body corridors, filling in gaps in Green Infrastructure provision, and/or creating and increasing biodiversity corridors and Species and Habitats of Principal Importance, <i>whilst also seeking to avoid increased recreational use of the South Pennines SPA and SAC.</i>		
160	GN3	<p>Natural Environment</p> <p>The Council will seek to achieve better management of Calderdale’s natural environment by requiring developments to:</p> <ul style="list-style-type: none"> i. Conserve and enhance the biodiversity and geological features of the Borough by protecting and improving habitats, species, sites of wildlife and geological value and maximising biodiversity and geodiversity opportunities in and around new developments; ii. Conserve, enhance and restore the habitats, water quality, physical structure and local distinctiveness of the Borough's canal and river corridors as natural floodplains, functioning ecosystems and important strategic wildlife habitat networks allowing the free movement of wildlife; iii. Ensure there are no residual adverse impacts resulting from a proposed development, where in exceptional circumstances the reasons for the proposed development clearly outweigh the value of the ecological feature adversely affected and there are no appropriate alternatives. The adverse impacts of the development must be proportionately addressed in accordance with the hierarchy of: mitigation, compensation and finally offsetting. When appropriate, conditions will be put in place to make sure appropriate monitoring is undertaken and make sure mitigation, compensation and offsetting is effective; iv. Take appropriate steps to maintain or enhance the favourable conservation status of populations of protected species and species of conservation concern; v. <i>Takes appropriate steps to avoid recreational disturbance and urban edge effects, mitigating for recreational disturbance though the provision of recreational green space where appropriate;</i> vi. Protect, restore and enhance other features of natural environmental importance, in line with local environmental priorities; vii. Design-in wildlife, maximise multi-functionality and provide appropriate management, ensuring development follows the mitigation hierarchy and achieves <u>measurable net gains in biodiversity in accordance with the most up to date national and local guidance;</u> viii. Contribute towards the targets set out for Habitats and Species of Principal Importance and the environmental priorities of Local Nature Partnerships and biodiversity offsetting schemes, as appropriate; ix. Deliver enhancement and compensation, commensurate with their scale, which contributes towards the achievement of a coherent and resilient ecological network; x. Protect and enhance the distinctive landscape character of Calderdale; 	Request of conservation officer to ensure NPPF compliance on Biodiversity Net Gain.	Minor

Page	Para/Table/ Box/Policy	Tracked change	Reasons for change	MM or Minor?
		<ul style="list-style-type: none"> xi. Adopt good environmental site practices as appropriate, including in the form of a Construction Environmental Management Plan (CEMP) where appropriate; xii. Be informed by adequate ecological information, prepared by a competent ecology professional, conforming to British Standard BS42020, Biodiversity - Code of practice for planning and development; and xiii. Where opportunities arise, water bodies should be taken out of culvert, or daylighted if not possible, and physical barriers made passable to fish species. Under exceptional circumstances where culverting is delivered, daylighting should be integrated for habitat protection. <p>Development proposals which are likely to have a significant adverse impact on a site with one or more of the following designations, habitats or species will not be permitted except in exceptional circumstances where the reasons for the proposed development clearly outweigh the value of the ecological feature adversely affected and there are no appropriate alternatives:</p> <ul style="list-style-type: none"> i. Local Nature Reserves (LNR); ii. Local Wildlife Sites (LWS); iii. Local Geological Sites (LGS); iv. Calderdale Wildlife Habitat Network (or similar designation); v. Priority habitats and species within the Calderdale Biodiversity Action Plan; vi. Habitats and Species of Principal Importance within the UK Biodiversity Action Plan; vii. Habitats and species listed in respect of Section 41 of The Natural Environment and Rural Communities Act 2006; viii. Legally protected species; ix. Areas of Ancient and Semi-Natural Woodland; and x. Nature Improvement Areas. <p>Development proposals which are likely to have a significant adverse impact on a site with one or more of the following national or international designations will not be permitted:</p> <ul style="list-style-type: none"> i. Special Protection Areas (SPAs); ii. Special Areas of Conservation (SACs); iii. Sites of Special Scientific Interest (SSSI); and iv. Sites identified, or required, as compensatory measures for adverse effects on European sites. <p>An ecological assessment will be required for development located within the 2.5km South Pennine Moors (phase 2) SPA & SAC buffer and outside the urban area in order to establish if the land is of functional</p>		

Page	Para/Table/ Box/Policy	Tracked change	Reasons for change	MM or Minor?
		<p>importance to designated South Pennine Moors (phase 2) SPA species.</p> <p>Any proposed development which may directly or indirectly compromise the conservation objectives of a SAC or SPA will not be permitted unless the proposal meets the conditions specified in regulation 61 and 62 of the Conservation of Habitats and Species Regulations 2010 (Habitats Regulations).</p>		

WORKING DRAFT

Table 2 – Calderdale Local Plan Publication Draft Appendix 1 Site Allocations Supporting Information (APX)

Page	Para/Table/Box/Policy	Tracked change	Reasons for change	Major or Minor?
12	0573	Site specific Hydraulic Modelling and FRA required. No more vulnerable or highly vulnerable uses on the ground floor. Emergency Access and egress plans must be provided to the LPA for consideration and agreement.	Consideration of Environment Agency Comments 24 Feb 2020	MM
14	0327	EA understand this site may have been impacted by the recent flood events. Site specific Hydraulic Modelling and FRA required. No more vulnerable or highly vulnerable uses on the ground floor. Emergency Access and egress plans must be provided to the LPA for consideration and agreement.	Consideration of Environment Agency Comments 24 Feb 2020	MM
17	0177	The generic points outlined in EA comments 24 Feb 2020 and listed in Table 2 below should be applied. Site specific Hydraulic Modelling and FRA may be required as the site is effected by an ordinary watercourse (not main river).	Consideration of Environment Agency Comments 24 Feb 2020	MM
18	LP0009	<p>Site Specific Considerations</p> <ul style="list-style-type: none"> - Provision of SuDS and green and blue infrastructure - Defence lines, and Flood resilience and resistance - Realignment of retaining wall of the adjacent area of the development. - Exclude development within a 20m buffer to the river, and 10m buffer to reduce any impact on BAP and Wildlife Habitat Network - <i>Consult with Calder Rivers Trust on development proposals</i> - Avoid massing and height of buildings which increase the level of shade over the river. - Possible land remediation 	Correction – Request to be consulted by Calder Rivers Trust	MM
24	LP0960	<p>Constraints</p> <ul style="list-style-type: none"> - Potential for surface water flooding - UK BAP Priority habitat on site - Deciduous woodland - Archaeology – (PRN12154) - <i>Horncliffe Quarry Landfill</i> 	Error – Missing site constraint	MM
24	LP0960	<p>Site Specific Considerations</p> <ul style="list-style-type: none"> - Provision of SuDS - Good quality design and layout, including junction design - Noise mitigation - <i>Mitigation measures to protect Wildlife Habitat Network</i> 	Error – Missing site specific consideration	MM
25	LP1223	<p>Constraints</p> <ul style="list-style-type: none"> - Potential land contamination - Multiple ownership 	Error – Missing site constraint	MM

Page	Para/Table/Box/Policy	Tracked change	Reasons for change	Major or Minor?
		<ul style="list-style-type: none"> - Overhead powerlines - <u>Potential fluvial flood risk</u> 		
27	LP0105	<p>Site Specific Considerations</p> <ul style="list-style-type: none"> - Provision of SuDS - Possible inclusion of buffer to northern boundary to cutting - Good quality design and layout - <u>Consultation with West Yorkshire Geology Trust.</u> - <u>Provide suitable access to view geological feature.</u> 	Correction - The site is located in close proximity to Regionally Important Geological or Geomorphological Site Beacon Hill and Godley Lane. Request for a Site Specific Consideration from WYES.	MM
45	LP1220	<p>Constraints</p> <ul style="list-style-type: none"> - Local wildlife corridor - <u>Site adjacent to the Wildlife Habitat Network</u> - Unstable land - Potential for fluvial and surface water flooding - Sowerby Bridge Air Quality Management Area - Listed Buildings (Old Hall, Washer Lane - Grade II) 	Error – Missing site constraint	MM
47	LP0771	<p>Constraints</p> <ul style="list-style-type: none"> - Potential of surface water flooding from Clifton Beck and Boundary Beck - Contaminated land - <u>Listed Building (Former St Aidan's Mission Church - Grade II)</u> 	Error – Missing site constraint	MM
48	LP0509	<p>Constraints</p> <ul style="list-style-type: none"> - Potential to increase surface water run off - Third party land may be required for access. - Potential land contamination - <u>Proximity to Elland Conservation Area</u> - <u>Listed Building (Former Town Hall - Grade II)</u> <p>Floorspace requirement - Clarification is needed as to how the specified floor space for B uses has been calculated and whether it is an indicative figure across the site, or an upper limit.</p>	<p>Error – Missing site constraint</p> <p>The assessment of an indicative capacity of B1 floorspace is based on the assumptions of one third of the site providing equal areas of B1a and B1c use. The Council is agreeable to including this information within the site assessment report and Appendix 1 for clarification.</p>	MM
49	LP1088	<p>Indicative Developable Area</p> <p>0.61 <u>0.47</u></p>	Error – Incorrect indicative developable area	MM

Page	Para/Table/Box/Policy	Tracked change	Reasons for change	Major or Minor?
49	LP1088	Constraints <ul style="list-style-type: none"> - Possible land contamination - UK BAP priority area (Black Brook) - Listed Building in close proximity - Historic Environment Record PRN3675 - <u>Risk of reservoir flooding</u> - <u>Potential fluvial flood risk</u> - <u>Non main watercourse (Black Brook)</u> 	Correction - Flooding constraints suggested by the Environment Agency	MM
50	LP1123	Constraints <ul style="list-style-type: none"> - Potential to increase surface water run off - Possible contaminated land - Road noise - Air quality - <u>Risk of reservoir flooding</u> - <u>Potential fluvial flood risk</u> 	Correction - Flooding constraints suggested by the Environment Agency	MM
55	1170	Reports required <ul style="list-style-type: none"> - Hydrological Assessment and evaluation of surface water drainage network - Flood Risk Assessment - Transport Assessment A58 / New Bank and A58 / A629 / Orange Street roundabouts - Land Contamination Assessment - <u>Preliminary Ecological Appraisal and protected species survey</u> - <u>Pre-determination archaeological survey</u> 	Correction - In light of the UK BAP priority habitat, Reports suggested by WYES/Ecology Correction – Suggested report by WYAAS	MM
60	0922	The proposed Hebden Bridge Flood Alleviation Scheme may need to be considered in this location.	Consideration of Environment Agency Comments 24 Feb 2020	MM
67	0571	Constraints <ul style="list-style-type: none"> - Surface water flood risk - River Calder and lowland mixed deciduous woodland - UK BAP Priority Habitats - Protected species - otters and bats - Wildlife Habitat Network - Proximity to industrial/commercial uses - Proximity to Brighouse Air Quality Management Area - <u>Risk of reservoir flooding</u> - <u>Potential fluvial flood risk</u> - <u>Adjacent to River Calder</u> 	Correction - Flooding constraints suggested by the Environment Agency	MM

Page	Para/Table/Box/Policy	Tracked change	Reasons for change	Major or Minor?
67	0571	The generic points outlined in EA comments 24 Feb 2020 and listed in Table 2 below should be applied. Topographical surveys may be required to inform FRA.	Consideration of Environment Agency Comments 24 Feb 2020	MM
72	LP1033	Site Specific Considerations - A site specific policy is required to ensure the retention of a strong and defensible boundary between the allocation for housing and the Green Belt - Surface water management measures, including provision of SuDS and green roofs - Provision of storage for storm water run-off is recommended - Remove the grassland from the developable area and maintain grassland on site Remove "A site specific policy is required to..."	Error – Text isn't required.	Minor
76	LP1077	Site Specific Considerations - Provision of green and blue infrastructure including SuDS and green roofs - Provision of storage for storm water run-off is recommended - Mitigating improvements required at A58 / A644 junction - Remove deciduous woodland from developable area - Retain and restore hedgerow; retain trees and shrubs where possible. - Plant dense locally native shrubs adjacent to woodland to prevent access except along rights of way. - Specify and implement other prescriptions to minimise impacts on the woodland due to increased recreational pressure. - Plant woodland and develop locally native grasslands in the remainder of the area excluded from the developable area. - Retention of the stone boundary wall <i>where appropriate and practical</i> - Have regard to the West Yorkshire Low Emission Strategy which has been adopted by the Council. This gives guidance on good practice for mitigating air quality impacts.	Error – missing text	Minor
86	LP1451	Constraints - Potential for increased surface water run-off - Highways (Impact on the Strategic Highway Network; and significant traffic impact flows in central Brighouse) - Ecology (river and lowland mixed deciduous woodland to the south of the site both UK BAP priority habitats; species rich semi-improved grassland in the south central area and a short section of disused railway to the north-east fall within the Wildlife Habitat Network;) - Heritage (Grade II Firth House; Grade II Listed Anchor Pit Lock to the east of the site; Class	Error – Missing site constraint	MM

Page	Para/Table/Box/Policy	Tracked change	Reasons for change	Major or Minor?
		<p>III Archaeological Site (PRN 2675) within the site; and The Gatehouse on Huddersfield Road which is undesignated)</p> <ul style="list-style-type: none"> - Noise from motorway - Impact upon Brighouse AQMA - Toothill being monitored for traffic pollution - <u>Rights of Way (check number)</u> 		
86	LP1451	<p>Site Specific Considerations</p> <ul style="list-style-type: none"> - Provision of green and blue infrastructure including SuDS - Topography and water features that affect the layout of the development - Contribute to the additional schemes identified by the Highways England West Yorkshire Infrastructure Study and included in the Infrastructure Delivery Plan. Junction improvements around Brighouse - Provide a minimum stand-off from the river of 10m and 20m from Bradley Wood - Provide for biodiverse recreational space within the development in order to reduce pressure on Bradley Wood. - Provide funding for habitat protection - SuDS scheme should take account of existing biodiversity and take the form of fen, marsh, wet woodland, wet grassland or standing water in basins <p>Biodiversity mitigation/enhancement should provide locally native species rich unimproved grassland and locally native species rich hedgerows, restoring gaps in the Wildlife Habitat Network</p> <ul style="list-style-type: none"> - Inclusion of Open Space - Consideration to recommendations provided within the HIA. - <u>Consider recommendations of the West Yorkshire Low Emission Strategy.</u> West Yorkshire Low Emission Strategy has been adopted by the Council. This gives guidance on good practice for mitigating air quality impacts. - Ensure the creation of a strong and defensible boundary between the allocation for housing and the Green Belt 	Error – Missing site constraint	MM
88	LP1463	<p>Constraints</p> <ul style="list-style-type: none"> - Potential for increased surface water run-off - Highways (Impact on the Strategic Highway Network; and significant traffic impact flows in central Brighouse) - Ecology (Species rich acid and neutral grassland likely to be UK BAP priority habitat; Lowland mixed deciduous woodland; Wildlife Habitat Network; and Birds including curlew, 	Error – Missing site constraint	MM

Page	Para/Table/Box/Policy	Tracked change	Reasons for change	Major or Minor?
		<p>lapwing, golden plover and tree sparrow)</p> <ul style="list-style-type: none"> - Heritage (Grade II Woolrow and Woolrow Farmhouse; Class III Archaeological site PRN4062; Locally Listed Historic Park and Garden Wellholme Park; undesignated Former Railway Structures) - Impact upon Brighthouse AQMA - Turbines and potential of noise and shadow flicker - Contaminated Land - <u>Rights of Way (check number)</u> 		
88	LP1463	<p>Site Specific Considerations</p> <ul style="list-style-type: none"> - Consideration of topography and water features that affect the layout of the development. - Provision of green and blue infrastructure including SuDS - Contribute to the additional schemes identified by the Highways England West Yorkshire Infrastructure Study and included in the Infrastructure Delivery Plan. Junction improvements around Brighthouse - Remove Wildlife Habitat Network areas from proposed allocation - On-going grassland and woodland management for biodiversity enhancement - Inclusion of Open Space - Consideration to recommendations provided within the HIA. - <u>Consider recommendations of the West Yorkshire Low Emission Strategy.</u> West Yorkshire Low Emission Strategy has been adopted by the Council. This gives guidance on good practice for mitigating air quality impacts. - Ensure the creation of a strong and defensible boundary between the allocation for housing and the Green Belt. 	Error – Missing site constraint	MM
89	0037	<p>Constraints</p> <ul style="list-style-type: none"> - Stainland Conservation Area - Flood storage area - <u>Holywell Brook (UK BAP priority habitat)</u> - <u>Wildlife Habitat Network</u> - <u>Potential to increase surface water run off</u> - <u>Grade II listed viaduct (220m south) / Grade II listed boundary marker (adjacent)</u> - <u>Long Heys Farm (potential standoff)</u> <p>Reports</p>	Error – Incorrect details in Appendix 1	MM

Page	Para/Table/Box/Policy	Tracked change	Reasons for change	Major or Minor?
		<p>-Transport Statement <u>- Flood Risk Assessment, informed by a Hydrological Assessment</u> <u>- Transport Assessment</u> <u>- Ecological Impact Assessment</u></p> <p>Site Specific Considerations - Provision of SuDS. - Measures to discourage the use of the Church Lane junction with Stainland Road - Consider the impact on visual amenity currently provided by the site. - Consideration to recommendations provided within the HIA. - Ensure the creation of a strong and defensible boundary between the allocation for housing and the Green Belt. <u>- Provision of green and blue infrastructure, such as SuDS and green roofs.</u> <u>- Realignment of retaining wall of the adjacent area of the development.</u> <u>- Leave a minimum stand off of 10m from Holywell Brook and plant with locally native species.</u> <u>- Minimise light pollution and other disturbance to Holywell Beck.</u> <u>- Building heights and materials need to be carefully considered.</u> <u>- Existing trees should be retained wherever possible.</u> <u>- The listed boundary marker should be retained and protected during any construction works.</u> <u>- Stand off necessary if Long Heys Farm is operational.</u> <u>- Ensure the creation of a strong and defensible boundary between the allocation for housing and the Green Belt</u></p>		
99	LP0046	<p>Constraints - Access—Substandard Visibility Splays & narrow - Local Wildlife Site - Beechwood Park LNR/LWS - Contaminated land - Grade II Listed Building - Threapcroft Farm to the west - Rights of Way (Halifax 251)</p>	Error –Constraint not relevant to the site	Minor
100	LP0103	<p>Site Specific Considerations - Provision of SuDS through green and blue infrastructure - Restore an area of lowland meadow to be used as open space by supplementary planting with appropriate species and management.</p>	Error – Missing site constraint	MM

Page	Para/Table/Box/Policy	Tracked change	Reasons for change	Major or Minor?
		<ul style="list-style-type: none"> - Consider the impact on visual amenity currently provided by the site. - <i>Consider recommendations of the West Yorkshire Low Emission Strategy.</i> West Yorkshire Low Emission Strategy has been adopted by the Council. This gives guidance on good practice for mitigating air quality impacts. 		
107	0397	<p>Constraints</p> <ul style="list-style-type: none"> - Surface water flood risk - Access only suitable for a small mews court type development of up to around 10 dwellings - Within <i>Adjacent to</i> Savile Park Conservation Area - Light spillage from adjacent tennis courts 	Correction - Site adjacent to, not within the Savile Park Conservation Area.	MM
125	1180	<p>Constraints</p> <ul style="list-style-type: none"> - Flooding - Ovenden Brook and surface water - Lowland Mixed Deciduous Woodland - <u>Wildlife Habitat Network.</u> - Heritage - Old Lane Mill and Former Boiler House and Attached Chimney to North of Old Lane Mill (Grade II* Listed Buildings), Ackroyden Conservation Area, possible archaeological remains - Contaminated Land - Noise - waster transfer station and road 	Error – Missing site constraint	MM
125	1180	The generic points outlined in EA comments 24 Feb 2020 and listed in Table 2 should be applied. Surface water flood risk to be considered by LPA.	Consideration of Environment Agency Comments 24 Feb 2020	MM
130	1216	<p>Constraints</p> <ul style="list-style-type: none"> - Potential for Fluvial (Ovenden Brook) and Pluvial Flooding - Public rights of way (Halifax 435, 436 and 736) - Semi improved species rich grassland - <u>Wildlife Habitat Network</u> - Overhead Power Line - Multiple Ownerships - Substandard alignment on Broad Tree Road towards junction with A629 - Proximity to Listed Buildings (Boothtown House and 21-25 Hall Street North) - Archaeological site PRN4718 Site of 14th Century Boothtown Hall, site also contains PRN5443 - Impact of industrial, commercial and road traffic noise to the west 	Error – Missing site constraint and report required.	MM

Page	Para/Table/Box/Policy	Tracked change	Reasons for change	Major or Minor?
		<ul style="list-style-type: none"> - Contaminated Land <p>Reports required</p> <ul style="list-style-type: none"> - Flood Risk Assessment - More investigations into route to/from site. Full Transport Assessment and Travel Plan and access junction proposals to distribute the peak hour trips sufficiently such that the impact on the CAT 2 A629 would be acceptable. - Bat Survey - <u>Preliminary Ecological Appraisal and protected species surveys required alongside a sensitive landscape plan (including SuDS) to ensure there is no fragmentation of CWHN and a net gain in biodiversity.</u> - Desk based assessment and archaeological field evaluation should be undertaken prior to development in line with NPPF. - Noise Impact Assessment - Contaminated Land Assessment 		
137	1429	<p>Site Specific Considerations</p> <ul style="list-style-type: none"> - Provision of SuDS - Consider impact of loss of tennis courts on provision in the area - Consideration to recommendations made within the HIA - Reduce developable land by providing a buffer of 10m around the site and around the woodland within the site. Retain the vegetation within these buffers and supplementary plant with locally native shrubs. - <u>Plant boundaries with native species-rich hedgerows.</u> 	Error - The current ecology Site Specific Consideration is not correct and is not related to the ecological constraints on this site.	MM
138	LP1481	<p>Site Specific Considerations</p> <ul style="list-style-type: none"> - Provision of green and blue infrastructure including of SuDS and green roofs - Consideration to recommendations provided within the HIA. - <u>Remove the area of lowland mixed deciduous woodland from the developable area.</u> 	Error – Missing site specific consideration	MM
163	1224	The EA understand flooding from River Ryeburn affected this area during the recent flood events. Site specific Hydraulic Modelling and FRA may be required. No more vulnerable or highly vulnerable uses on the ground floor. Emergency Access and egress plans must be provided to the LPA for consideration and agreement.	Consideration of Environment Agency Comments 24 Feb 2020.	MM
166	LP0435	<p>Constraints</p> <ul style="list-style-type: none"> - Haugh End House - Grade II* Listed, Old Haugh End and Old Haugh End Cottage; Haugh End Farmhouse - Grade II Listed, and Brockwell Gate - Grade II Listed 	Correction - constraint suggested by the Environment Agency	MM

Page	Para/Table/Box/Policy	Tracked change	Reasons for change	Major or Minor?
		<ul style="list-style-type: none"> - Site access - Road traffic noise - Proximity to Sowerby Bridge Air Quality Management Area - <u>Proximity to waste site EAWML 65545 (Calder Valley Skip Hire Ltd).</u> 		
170	LP1398	<p>Constraints</p> <ul style="list-style-type: none"> - Right of Way (Sowerby Bridge 098) - Third party land to achieve suitable access - Adjacent to Wildlife Habitat Network - Listed Buildings - Brockwell House and Brockwell Cottage (Grade II) to the south and east, and Bullace Trees Cottage (Grade II) to the south - Air quality and the impact of additional road traffic taken cumulatively - Proximity to Ryburn Valley High School - Tree Preservation Orders - Loss of natural and semi natural urban green space - <u>Proximity to waste site EAWML 65545 (Calder Valley Skip Hire Ltd).</u> 	Correction - constraint suggested by the Environment Agency	MM
172	LP1412	<p>Constraints</p> <ul style="list-style-type: none"> - Site access would require significant earthworks - Wildlife Habitat Network - Listed Buildings - Brockwell House and Brockwell Cottage (Grade II) to the north, and Bullace Trees Cottage (Grade II) to the south - Air quality and the impact of additional road traffic taken cumulatively - Tree Preservation Orders - Loss of natural and semi natural urban green space - Road noise - <u>Proximity to waste site EAWML 65545 (Calder Valley Skip Hire Ltd).</u> 	Correction - constraint suggested by the Environment Agency	MM
173	LP1415	<p>Constraints</p> <ul style="list-style-type: none"> - Site access - changes in levels likely to be mean dual access from Walker Lane and Wakefield Road - Within Sowerby Bridge Air Quality Management Area - Noise (road traffic and industrial) - <u>Proximity to waste site EAWML 65545 (Calder Valley Skip Hire Ltd).</u> 	Correction - constraint suggested by the Environment Agency	MM
178	LP0640	<p>Double check whether Oak Hill Clough will have an impact on flood risk given distance between the watercourse and the site. Potential for modification depending on whether FRA required for Oak Hill Clough?</p>	Resulting from reps – need to check impact of Oak Hill Clough	MM

Page	Para/Table/Box/Policy	Tracked change	Reasons for change	Major or Minor?
181	0659	The EA understand this site may have been impacted by the recent flood events. The generic points outlined in EA comments 24 Feb 2020 and listed in Table 2 below should be applied.	Consideration of Environment Agency Comments 24 Feb 2020	MM
184	LP1534	<p>Constraints</p> <ul style="list-style-type: none"> - Fluvial (Walsden Water) and Pluvial Flood Risk. - Unstable Land. - Possible Land Contamination. - Ecological Issues - Lowland mixed deciduous woodland (UK BAP Priority habitat), Rochdale Canal and specific species such as otters, bats and birds. - Birks Mill and Birks House - non designated heritage asset. - <u>Site is located within a groundwater Source Protection Zone 1 (SPZ1) for groundwater abstraction that is used for drinking water needs</u> <p>Reports required</p> <ul style="list-style-type: none"> - Flood Risk Assessment. - Hydrological Assessment. - <u>Hydrogeological (groundwater) Risk Assessment that identifies potential risks to groundwater from the development and identifies mitigation measures</u> - Transport Assessment. - Bat and otter surveys. - Habitat Regulations Assessment/Ecological Impact Assessment. - Land Stability Report. - Land Contamination Assessment <p>Site Specific Considerations</p> <ul style="list-style-type: none"> - Provision of SuDS. - Signage would be needed at the bridge over Birks Mill Lock to give priority to traffic approaching the site from the A6033. - Native tree and shrub planting in area outside developable area. - Bat sensitive lighting scheme. - Provision of a 10m buffer between site and canal which should be planted with native trees and shrubs. - Removal of lowland mixed deciduous woodland (UK BAP Priority habitat) from developable area. 	Correction - constraint, report and site specific consideration suggested by the Environment Agency	MM

Page	Para/Table/Box/Policy	Tracked change	Reasons for change	Major or Minor?
		<p>- Careful consideration will be required in terms of the relationship of new development to the canal, together with scale, layout, design and materials.</p> <p>- <i>Implementation of mitigation measures identified in the hydrogeological (groundwater) risk assessment.</i></p>		
Various	All LP sites	Reword all SSCs which reference the HIA to determine whether it is a "Health Impact Assessment" or "Heritage Impact Assessment"	For avoidance of doubt/clarity	Minor
Various	All LP sites	Add following text to all site assessments "The applicant should demonstrate measurable biodiversity net gain through use of the Defra Biodiversity Net Gain Calculator."	Change in guidance	MM
Various	All LP sites with Flood Risk	<p>EA suggest that to make clear the requirements relating to the deliverability of site in relation to flood risk these should include, but not be limited to;</p> <ul style="list-style-type: none"> • Following a sequential approach to the layout of the site – i.e. locating development in areas of least flood risk; • To include the requirement of site specific FRA; • To include the potential requirement of flood risk hydraulic modelling; • To specify for sites contained in flood zones 2 and 3 that any more or highly vulnerable uses may not be permitted on the ground floor; • Emergency Access and egress plans must be provided to the LPA for consideration and agreement with their emergency planners; • Specific consideration being given to impacts from historic flooding, such as recent flood events in Calderdale. <p>These comments are likely to apply to all sites which are impacted by flood risk.</p>	Consideration of Environment Agency Comments 24 Feb 2020	MM