

Matter 2 – Vision, objectives and overall strategy

Issue – Does the Plan’s vision, objectives and overall strategy present a positive framework that is consistent with national policy, reflects the borough’s strategic position in the region, and will contribute to the achievement of growth and sustainable development?

Questions

a) Does the Plan’s Vision and strategic objectives provide a clear and cohesive framework for the future growth and development of Calderdale?

- The Plan does not provide a clear and cohesive vision for growth within Calderdale. It perpetuates existing unsustainable patterns of growth.
- It has been issued without a sound rationale or a co-ordinated evidence base. So much so that it cannot be described as credible, sound or fit for purpose.
- Its flaws are significant and fundamental. It is difficult to see how the Plan can meet the stipulated criteria.
- My view that the Plan is neither deliverable nor effective, comes from an analysis of the evidence base upon which it is built. It relies extensively on the assumption of locating two garden suburbs in South-East Calderdale. In fact, without these garden suburbs, the plan falls down as it cannot meet the basic housing requirement. The evidence base to demonstrate that these sites are deliverable is woefully deficient and thus by implication, the entire plan cannot be demonstrated to be sound.

b) The Plan seeks to deliver objectively assessed housing needs in full within the borough, and proposes a focus on land within settlements with some releases of land from the Green Belt. Is this broad approach justified and

soundly based? What alternative strategies were appraised, and why were they discounted?

- Calderdale Council have not appraised alternative strategies robustly.
- The designated Green Belt in South East Calderdale is not a single local authority area designation – it is a West Yorkshire wide designation which crosses Council boundaries. This poses the question as to why a West Yorkshire wide Green Belt review has not been carried out instead of each authority conducting its own review? The current Plan does not seek to answer this question, yet it is made explicitly clear in the Green Belt Review final report that cross boundary consideration of this key strategic matter is an absolute requirement under the Duty to Co-operate. The process used for releasing land from the Green Belt is inadequate and is a fundamental failing of the Plan.
- Housing within the Plan is focused in Brighouse whereas employment is focused in Halifax. Given that Brighouse is the area of Calderdale where out-commuting is greatest and the containment of workers is lowest, the concentration of housing in this area will exacerbate unsustainable patterns of growth across the district. To make matters worse, the infrastructure requirements in the plan (to support the cross-borough and out of borough travel patterns which will inevitably be created) are woefully deficient.
- The lack of a coherent Infrastructure Delivery Plan (IDP), the fact that the spatial allocation of housing has not broadly followed the settlement hierarchy, and the proposed substantial Green Belt releases on land which the Council's own analysis concludes performs highly when assessed against existing Green Belt criteria, should all lead to a detailed appraisal of alternatives that would reduce the inherent problems (perpetuating unnecessary travel patterns; lack of infrastructure; unjustified release of substantial Green Belt) within the current approach – such appraisals however have not been undertaken.

c) To what extent does the Plan seek to reduce out-commuting and promote greater self-containment?

- The Plan does not seek to reduce out-commuting and promote greater self –containment. In fact, with its emphasis on housing growth in Brighouse, it seemingly promotes the exact opposite.
- Major housing and employment allocations are proposed in Brighouse next to Junction 25 of the M62. Brighouse’s location next to the Motorway lends itself to commuting: this explains why at present, out-commuting is so high and the containment of workers is so low (25% compared to the borough average of 52%). Proposing major housing allocations in Brighouse, next to a Motorway, is therefore likely to exacerbate this existing issue as new housing in this area will serve as a commuter settlement for both outside of Calderdale (Leeds, Huddersfield, Manchester) and within Calderdale (e.g. Halifax which has a substantial employment allocation). This is contrary to the strategic objectives of the Plan.

d) Is Calderdale’s role in the Leeds City Region (LCR) clearly defined? How will the Plan contribute to objectives/policies in the LCR Strategic Economic Plan?

- There has been very little consultation between Calderdale and the two City Regions (Leeds & Manchester) to see if Calderdale’s approach is coherent and aligns with the City Region objectives.

e) What are the implications of the district’s proximity to the Manchester City Region, and planned growth strategies in this area?

No comment.

f) What are the benefits and implications of the LCR City Deal, for Calderdale? To what extent will funding help to promote and facilitate housing and employment growth in the district?

- The funding which central Government has made available for the LCR is welcome and will assist all of the constituent local authorities to facilitate housing and employment growth as prescribed within a clear and cohesive Local Plan. However, as per my comments elsewhere within this representation, I do not consider the Plan to be cohesive, nor is it reinforced by an effective IDP. The funding from the LCR City Deal would, however, assist in delivering a sustainable, alternative vision for development in Calderdale which meets the strategic objectives required of a Plan.

g) What strategic infrastructure improvements have recently taken place in Calderdale, or are committed to come forward over the Plan period (from City Deal or other funding sources)?

- The current Infrastructure Delivery Plan (IDP) is extremely weak and badly lacking in detail. It does not demonstrate that substantial development is deliverable because it does not clearly illustrate how, where, and when the highway improvements, schools, health facilities, and other services needed to support development will be delivered and funded. The IDP gives absolutely no assurances that the key schemes needed to unlock growth will actually go ahead - as the Council's own supporting documents openly acknowledge. It is a complete and utter failure and members of the public will rightly question how the Local Plan can rest upon such a deeply flawed document.
- For example, the IDP provides no certainty whatsoever that the major interventions required to the M62 (a new junction 24a and improvements to existing junctions 24 and 25) will be delivered. Although it recognises that improvements are required to the road network in Brighouse to release the Garden suburbs, it contains insufficient detail as to what form this will take, when it will be delivered, and how a significant funding shortfall will be overcome.
- Indeed, the single greatest weakness of the garden suburb proposal, and thus the Local Plan upon which it is intrinsically linked, is the highways

evidence. The Council commissioned WSP to produce several reports on the Local Plan. One of these reports – Strategic Vision For South East Calderdale – Traffic Statement, was produced in 2016. This report stated that its main purpose: ‘is to set out the traffic modelling work that has been carried out to support the strategic vision for South East Calderdale’. The traffic report effectively states that the existing highway network is operating satisfactorily and that with no further highway improvements it will continue to operate without any onerous impacts when the traffic from up to 6000 houses is added.

- The Clifton Village Neighbourhood Planning Forum commissioned a highways consultancy firm to complete an independent examination of the transport implications of the Local Plan. This independent report concluded that the Council’s traffic modelling work, conducted by WSP, generally understated the level of the existing demand on the highway network in Brighouse. It further noted that ‘many locations in Brighouse are significantly over capacity and are operating under severely congested conditions’. It concluded that in the Council’s report the scale and severity of the highways impact has been significantly understated and that ‘the decision to propose such significant development in Brighouse has been based on completely inadequate highway evidence’. This report undermines the conclusion that the highways network in Brighouse can facilitate development on such an enormous scale and casts doubt on the deliverability of the garden suburbs. Because the Plan is so over reliant of these sites, the conclusions of this highway report cast doubt on the integrity of the Plan as a whole.
- The inherent weaknesses within the Council’s evidence base when it comes to infrastructure improvements for the Local Plan is further highlighted by the Council’s reliance on their Strategic Transport Model despite this being publicly accepted as not being fit for purpose: a report to the WYCA on 11th October 2018 quoted the Director of Delivery for WYCA as stating that ‘the model has issues which bring into question its suitability’. Despite this fact, Calderdale Council continue to employ their

Strategic Transport Model to guide their transport vision for the Local Plan.

- Although the IDP recognises that new schools and health facilities are required to support the Garden Suburbs, it does not state when, where, and how these will be delivered. Nor does it state how they will be funded. Furthermore it is uncertain whether the Thornhills garden suburb is able to accommodate two new schools, (a secondary and a primary) in line with the space requirements mandated by Government, alongside the other demands placed upon the site within the Local Plan. There is, as of yet, no agreement how the additional health facilities alluded to within the IDP will be delivered either.
- Detail pertaining to infrastructure requirements elsewhere within Calderdale is also absent from the IDP. Hipperholme crossroads is one of the most congested junctions within West Yorkshire and yet the plan contains no definitive proposals for alleviating congestion that will only worsen as a consequence of significant housing and employment development a few miles away in Brighouse. Likewise, West Vale, Stump Cross and Sowerby Bridge town centre are among the worst congestion hotspots within Calderdale and yet the IDP fails to give any assurances that much needed traffic improvements will be delivered in these locations. Ripponden grinds to a halt when there are delays on the M62 and yet a coherent plan to alleviate the problems that this creates for the communities of the Ryburn Valley is absent from the IDP, as are assurances that the congestion experienced on Burnley Road (A646), which links the Upper Calder Valley to Halifax, will be addressed.

h) Is Policy SD1 justified, effective and consistent with national policy?

No comment

i) Is Policy SD2 and the supporting text justified and effective?

No comment

