

# **Matters Issues and Questions Inspector Hearings week beginning July 1<sup>st</sup> 2019.**

## **Rastrick Neighbourhood Forum**

### **Matter 1**

#### **Questions**

**a.**

**Calderdale Council has failed to engage with the Rastrick Neighbourhood Forum (RNF) Since its recognition on 2/5/2017 the RNF has not received any unsolicited communication from the Council relating to the Councils Local Plan (LP)**

**The RNF have not been informed of important changes to the LP. i.e. In February 2018 the**

**Council significantly reduced the overall numbers of houses and housing sites in the Local Plan including those previously identified in the area the Forum represents.**

**The Council did not make this information available on its website until May 2018.**

**The RNF was in the process of preparing its own neighbourhood Development Plan and the change referred to above caused the RNF to completely reassess the work it had been undertaking on housing and employment sites in its area and work already prepared by Consultants (AECOM with a grant from Locality)**

**The RNF has attempted to engage with the Councils Spatial Planning Team using emails to seek information and the response from the Council has taken 3 forms:**

- 1. An emailed full response within one to two weeks**
- 2. An emailed part response within four weeks-.ie: a request for landowner information relating to sites in our area has only resulted in 10% of the requested information being provided which has caused the Forum considerable difficulty in engaging with individual local landowners.**
- 3. No response. i.e.: A Housing Needs Assessment for the Forums area  
A list of housing sites in its area that the Forum proposes- sent to Spatial Planning in 2017**

#### **Questions**

**b.**

**In the Councils Sustainability Appraisal August 2018, sustainability has not been demonstrated as achievable for any of the housing sites identified by the Council in the Forums designated area.**

**The majority of sustainability objectives, 80%+ in every site is marked as “uncertain” It is not satisfactory planning practice to include a site in the Local Plan when sustainability cannot be demonstrated as in the case of all of the identified housing sites in the Forums area.**

**c.**

**The Councils officer who is responsible for Ecology has not made any written contribution to the published Assessments of housing and employment sites identified by the Council in the Forums area.**

**The Forum has made the Councils Ecology officer of protected plant and animal species on identified housing sites in the Forums area**

**e.**

**Legal compliance - the current plan is not legally compliant:**

- **inadequate public involvement has been sustained, it is unclear whether stakeholders have been involved in the development of the vision for the site allocations with an actual local community understanding of the processes - there has been lack on the part of the LA to create transparency within the process.**
- **Calderdale Borough has relied on sites being offered as deliverable by developer/land owners in a vacuum, with no public consultation as part of the legal process - sites have been allocated as a need not for discussion - any discussion has been over ridden by bald policy statement that 'they can offer a solution to the need'.**
- **the scale of development proposed for Brighouse at 36% population increase is not proportionate to the scope of public engagement**
- **strategy has changed throughout the plan without adequate community involvement. In Rastrick/Woodhouse area the Woodhouse Garden Suburb was not an original strategy, it has no 'design brief' to support the title and there has been no public engagement to support the proposal**
- **There has been no community involvement in the development of the overall vision and In addition, there are new sites that in the latest LP**
- **There is evidence that the evidence which supports the delivery of sites is being withheld by Calderdale, developer/landowner information is not in the public domain - as part of local consultation the information, its provenance and the supply chain of this information and its influence on site allocations needs to be in the public domain - or the Forum/ Community can request it under the Freedom of Information Act.**
- **The ICO would question the adequate delivery of information into the public domain.**
- **Contrary to NPPF & greenbelt policy there is inconsistency with National Policy Legislation, the Garden Suburb proposal by the council is without substance and cannot be proven to be a sustainable model.**

**f.**

**The RNF is preparing its own Neighbourhood development Plan but as already mentioned the preparation has been significantly delayed by the Councils failure to engage with them**

## **Matter 2**

### **Questions**

**g.**

**The Council has made no infrastructure improvements in the Forums area and have not published any planned for the future.**

**A search on the Councils website-Local Plan- reveals a Green Infrastructure Strategy but nothing about the infrastructure needed for the successful integration of identified housing and employments sites within the Forums area**

**Communication from the Forum to local schools, Health Centres, Dentists, local organisations and businesses has revealed that none of them have been asked by the Council to provide information of their presents and developing needs.**

## **Matter 3**

### **Question**

**The Councils Local Plan does not included a Housing Need Assessment (HNA) for the Forums area instead including it in a considerable larger geographical area**

**The Forum has just received its Draft HNA through a grant from Locality and produced by AECOM.**

**A major factor identified is the uniqueness of the Forums area and its specific housing needs that have not been identified by the Council when identifying housing sites in the area.**

**Prior to May 2018 the housing sites in the Councils LP increased the population of the Forums area by 44%. The revised LP has reduced this to a 36% population increase which the Council has not shown to be sustainable or have a positive affect upon the amenity of residents and businesses.**

**The draft HNA produced for us by AECOM is specific to the Forums area and clearly shows the Council has failed to identify future housing needs related to the numbers of the present and future population including their ages, income and types of houses that are needed at present and in the future.**

**If AECOM can produce this information in than 8 weeks the failure of the Council to do this over a period of 6 + years is indicative of serious failing in the Councils LP.**

**In early 2018 the Forum indicated to the Councils Spatial Planning Team by email that it would not support any Planning Application in the Forums area for sites identified in the Local Plan until:**

- 1. The reduced numbers of houses decided by Council in February 2018 was published in a revised LP**
- 2. Details of the HNA by the Council was provided to the Forum**
- 3. Failing 2 the Forum obtained a Grant from Locality to undertake a specific HNA for its area.**
- 4. The LP received Government Approval**

**The Councils Spatial Planning Team did not acknowledge receipt or reply to the Forums email.**

**This decision by the Forum has been vindicated by a Planning Application for 113 houses on site LP0568 identified by the Council in the Forums area. This Application 18/01333/FUL was submitted to Council in October 2018 and is awaiting a planning Officers decision.**

**Our HNA indicates that 70% on new homes in a development should have 2 bedrooms or less. There are no such houses proposed in this Application.**

**The Forum has objected to this Application on legal and planning grounds ,validation by the planning Officer and the Applicants failure to Consult .( copy enclosed)**