

***Rastrick Neighbourhood Forum
Response to the Calderdale Local Plan
Submitted 29.08.2018
Mr D Collins.Chairman. Mr N Midgley Vice-Chairman.***

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Situation - the current form of September 2018 Local Plan allocations has done little more to progress the framework for a quality of environment and sustainable development in the Rastrick Forum area since the 2017 allocations were presented.

There is no new evidence to support the allocations, there is no framework for safeguarding of development sites to secure the quality, sustainability and diversity of development that Rastrick will need over the next 30 years.

Behind the scenes there is evidence that land owners have provided evidence to support the delivery of developable land, this evidence needs to come forward to the Forum to allow a coherent and lawful consultation.

It is apparent that this information is not in the public domain - other than in the presentation of revised site sizes and areas designated as suitable for development.

Voiced concerns by local residents over the scale of the sites allocated and the impact the mass of development has brought some political massaging of allocations, though the delivery of a framework for sustainable development is not part of the presented Local Plan. The need for closer appraisals & consultation is paramount before these sites can be seen as suitable for development within the scope of the Local Plan.

The allocations going forward cannot currently be influenced by the community, the allocations are tantamount to a developer shoe-in, without a detail and stress tested Local Plan the allocations provide a Planning brief by the back door.

Below we discuss the need for stress testing, a detail strategy and framework of development for Rastrick within the form of the Local Plan

Achievable delivery - broadly we need factual detail proposals for:

- good transport and access improvements
- good infrastructure and an enrichment of the current networks.
- we need more public green space
- space around dwellings existing and proposed
- thoughtful and inclusive design that provides sustainable buildings and environments
- parking reassessment to alleviate local road clogging
- noise and pollution control of highways
- a reinforcement of the Rastrick network of lanes and snickleways
- provide community with improved green routes through the settlement
- reinforce existing network and mesh of plots, look to historic boundaries to preserve what we have not sweep it away
- a complete Rastrick wide landscape plan that has to be adopted through all development sites.

Value of amenity - A real understanding needs to be fostered of the 'value' of land in Rastrick:

- each site needs its own quality and needs to 'mesh' with the existing
- density and a coherent method for the design of development needs to be appraised for each site at the allocation delivery stage
- The transport evidence base is inadequate for this stage of Local Plan development, the Plan and the Forum need access to the traffic model this should have been made available for the consultation
- We need each proposed development site to have within its mandate the security that it will improve the environment, allocations need to show in the development brief the options for planning gain by the process of development - there cannot be a dumbing down of the environment and the community amenity adjacent and within the allocated development sites.

Sustainability - there is a need for Calderdale to demonstrate to the Forum and the Community that the scope of allocations are a sustainable plan.

- a sustainability appraisal has been undertaken it does not adequately assess the holistic sustainability of individual sites. There are discrepancies within the allocations – most sites score poorly in terms of access. This questions the validity of the scale & type of development,

the use suitability and the actual delivery within the existing community environment.

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 /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% increase in population 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
- 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 and cannot be proven to be a sustainable model.

Network sustainability - there is a need for in depth analysis to support the allocations with professional unbiased surveys for:

- Ecology
- Traffic & transport
- Noise & air quality
- Geological & Archeology
- Public services - schools, local amenities, healthcare, employment

Before the allocations can be colonised by the developers:

- *New infrastructure needs to be 'fixed' before the allocations are ratified.*
- *Landscape amenity of existing settlements/property needs to be established.*
- *Urban green space within development plans - urban forest/woodland - green lungs, maintaining the traditional open fingers through Rastrick and this area.*
- There needs to be a test every development application with robust ecological and sustainable parameters - ratified by independent assessment - this has not happened, giving no credibility to any understanding of environmental, sustainability.

Impacts and influences - need for solid facts

- Is there a new motorway junction between Brighouse & Huddersfield?
- Are the new rail links or HS3 proposals

Comment on allocation sites:

Housing LP0565

Restricted access question as delivery & environmental impact, ownership of access restrictions.

Historic assessment needed of site

Environmental/ecology study - protect site as part of the open spaces within dense settlement areas of Rastrick.

Density of development/type of housing - question need for a design brief and reappraisal of what types of housing 'could' be delivered to benefit the community..

Buffer zone needs to be factored in to protect woodland habitats - site area reduced.

Vehicle access questionable for size of site onto narrow Rastrick Common - visibility and congestion.

*Questionable topographical issues - de-stabing ground water & run-off
Housing LP0568*

Development restricted by:

Archeology assessment needed. Roman Road - full dig required & watching brief.

*Loss of open space 'green amenity' Noise
& air quality due to M62 proximity.*

Ecology & environmental assessments.

Loss of Viable farming land.

Part of site shown for development relies on all access from A643 a feeder road to the M62/Huddersfield/Brighouse/Fixby/Rastrick that is already very busy - new access would be very close to existing traffic light/cross roads at Sun Inn which suffers regular grid lock.

This is a deep site to be accessed only from the A643

Junction also serves the Fire station - freedom of movement for emergency vehicles becomes a problem.

Site bounded by fire station 24 hour operation, noise, light pollution.

Reduced size proposal - presumably due to developer/land owner representations - data to Rastrick Planning Forum please.

Density of housing - see comment below

LP1000

Development restricted by:

Ecology & environmental assessments.

Loss of open space 'green amenity'

Part of site shown for development relies on all access from Birds Royd Lane & Woodhouse Lane onto Huddersfield Road at two points - an already congested feeder road between Huddersfield, Brighouse Fixby & Rastrick - access through Woodhouse is restricted and there are fundamental 'rat run' issues.

Density of housing - see comment below

Proximity of historic dwellings/buildings - sensitivity of any density of development needs to be assessed

LP1033 & 1032

Development restricted by:

Ecology & environmental assessments.

Loss of open space 'green amenity' - would need deep buffer zones and green landscape planning to release this site without detrimental harm to the green 'valley' environment which is a key historic landscape feature in this part Rastrick which has naturally formed the separation of growth the settlement providing distinct amenity and viable farmland.

Question over developable areas around the culverted beck - Environment Agency require 16m access zone centred on watercourses.

The site shown for development relies on all access from Toothill Bank, restock Common & Ogden Lane - all narrow, topographically challenging access 'lanes' in the midst of congested areas. Land stability & contaminated land issues.

Proximity of historic dwellings/buildings - sensitivity of any density of development needs to be assessed.

Density of housing - see comment below.

LP1078

Reduced size proposal - presumably due to developer/land owner representations - data to Rastrick Planning Forum please.

Ecology & environmental assessments.

Loss of open space 'green amenity' - loss of valuable recreational land - would need deep buffer zones and green landscape planning to release this site without detrimental harm to the green 'lung' environment which is a key historic landscape feature in this part Rastrick.

Question over developable areas around the culverted beck under the old cricket pitch & the allotments NW of the New Hey Road A643 terrace houses and to Spout Mill - as this is now shown as a key piece of developable land - Environment Agency require 16m access zone centred on watercourses.

The site shown for development relies on all access from A643 heavily congested arterial route Brighouse/Huddersfield and key Rastrick spine road.

NW corner relies on access from narrow congested Shannon Road close to the awkward Highbury School junction which is heavily parked in the day time with school traffic.

Erosion of the edge of the established and historic settlement on the western side of Rastrick.

Land stability & contaminated land issues from previous quarry/dumping uses.

Loss of protected meadow land.

Proximity of historic dwellings/buildings - sensitivity of any density of development needs to be assessed.

Loss of part of historic 'Far Common' that was a key jigsaw piece in the approaches to the historic form of Rastrick.

Density of housing - see comment below.

LP1322

being developed at present - should not be in allocations.

LP1451

Large size proposal - presumably due to developer/land owner representations - data to Rastrick Planning Forum please.

Ecology & environmental assessments.

Loss of open space 'green amenity' - loss of valuable farmland - would need deep buffer zones and green landscape planning to release this site without detrimental harm to the green 'lung' environment which is a key historic landscape feature in this part Rastrick.

Question over developable areas around the becks - Environment Agency require 16m access zone centred on watercourses.

The site shown for development relies on all access from Huddersfield Road heavily congested arterial route Brighouse/Huddersfield - the maybe of a bypass has to be discounted until it is proved.

Erosion of the edge of the established and historic settlement on the eastern side of Rastrick.

Land stability & contaminated land issues from previous uses.

Loss of protected meadow land.

Proximity of historic dwellings/buildings - sensitivity of any density of development needs to be assessed.

Question over what is a 'garden Suburb' - this needs to be quantified and a design brief and densities and facilities all outlined to allow this land to be consulted.

Suggest this site is removed from the allocations to allow full consultation, design brief, transport and highways infrastructure report to be established in full.

Density of housing - see comment below.

LP1469

Potential infill site, though consideration still needed for:

Ecology & environmental assessments.

Loss of open space 'green amenity' - loss of valuable recreational land - would need deep buffer zones and green landscape planning to release this site without detrimental harm to the green 'lung' environment which is a key historic landscape feature in this part Rastrick.

Erosion of the edge of the established and historic settlement on the northern side of Rastrick.

Land stability & contaminated land issues from previous uses.

Loss of meadow land.

Proximity of historic dwellings/buildings - sensitivity of any density of development needs to be assessed.

Noise pollution from railway.

Density of housing - see comment below.

LP1618 commercial/employment use site:

Large size proposal - presumably due to developer/land owner representations - data to Rastrick Planning Forum please.

Ecology & environmental assessments.

Loss of open space 'green amenity' - loss of valuable farmland - would need deep buffer zones and green landscape planning to release this site without detrimental harm to the green 'lung' environment which is a key historic landscape feature in this part Rastrick.

The site shown for development relies on all access from Huddersfield Road heavily congested arterial route Brighouse/Huddersfield - the maybe of a bypass has to be discounted until it is proved. Potential increases in traffic congestion and noise/air pollution from commercial/commuter vehicles.

Erosion of the edge of the established and historic settlement on the western side of Rastrick. Close proximity to historic sites and historic open spaces related to Toothill Hall a grade 2 listed building - remember the setting is part of the listing.

Land stability & contaminated land issues from previous uses.

Loss of protected meadow land.

Proximity of historic dwellings/buildings - sensitivity of any density of development needs to be assessed.

Suggest this site is removed from the allocations to allow full consultation, design brief, transport and highways infrastructure report to be established in full - with a projection in qualitative terms of employment provision - high end high quality providers?

Housing density considerations - detail requirements and considerations needed individually for each allocated site to 'fix' a realistic and qualitative goal for new domestic settlement and commercial opportunities.

Rastrick has an historic nature of development that characterises the form and current amenity value of the settlement.

There are widely differing forms of density - high density options should be appraised to offer viable 21st century starter/small home units as well as a cross section of sustainable development that encompasses, energy efficiency beyond current goals - zero carbon by 2050.

Detail percentages should be considered for:

1-5 bed units Starter

home

Flats

Studio apartments

Self build plots

Passiv Haus

Live - work units Care

homes

Plus allocations with sites for:

Public amenity

Open space

Recreational land

And commercial/public facilities:

Retail
 Healthcare
 Education
 Commercial uses - starter units
 Employment use

Housing density provides an established method of quantifying the intensity of development and is a crude indicator of amenity and environmental quality. However, compatibility of density is only one of many criteria used to assess the suitability of a housing proposal and other factors will often have overriding importance in determining an application.

The table below sets out examples of comparative density measurements expressed in habitable rooms, dwellings per hectare and plot ratios for a range of different densities. SEP

Comparative Housing Densities	
H igh	173 - 247 + habitable rooms per hectare 49 - 74 dwellings per hectare 0.5 : 1 + plot ratio
M edium	100 - 173 habitable rooms per hectare 25 - 50 dwellings per hectare 0.2 - 0.5 : 1 plot ratio
L ow	< 100 habitable rooms per hectare < 25 dwellings per hectare 0.2 : 1 plot ratio

SEP

In areas of mixed density the redevelopment should reflect the prevailing character of the immediate street frontage which could restrict the housing density.

When redeveloping sites in older housing areas, such as Victorian terraces, it may not be possible to achieve similar levels of density because of the requirement to provide off- street parking and other modern amenities.

The appropriate density and extent of individual developments will be established by reference to the following factors:

- the location, size, topography and shape of the site^[L]_[SEP]
- the need for development to reflect the height, form, extent and pattern of surrounding development, including site^[L]_[SEP] coverage by hard surfaced areas, to maintain the character of^[L]_[SEP] the area^[L]_[SEP]
- the need for schemes to retain existing site features, including^[L]_[SEP] mature trees, shrubs, hedgerows and soft amenity areas to maintain the character of the area^[L]_[SEP]

there is a concern with the volume and extent of the development proposal together with the intensification of site use.

Density should be measured both as the ratio of gross floorspace to site area (that is, of buildings within the curtilage) together with the number of habitable rooms per hectare.

- The density of a proposed development is only one of a number of criteria used to assess the acceptability of a scheme. Other factors such as the spacing between buildings, the layout and design of the proposal and the loss of trees or other soft amenity will have equal importance in assessing the impact of a development on the character of an area.^[L]_[SEP]

From calderdale design briefings/policy - comment in blue

Residential Density

All new housing developments should use land efficiently.

A minimum net density of at least 30 dwellings per hectare will generally be sought.

This is arbitrary, some sites could offer more some less - local constraints will offer differing opportunities - each site needs its own design brief.

Higher densities of development will be sought :

- In and around the main town centres;
- Close to main public transport routes and bus and rail stations; and
- Through innovative design solutions.
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Lower densities may be appropriate on certain sites, and proposals for development at lower densities will be determined taking into account the following:

- The character of the site, including topography and any biodiversity value;
- The character of the surrounding area;
- The need to preserve the amenity of existing or future residents;
- The availability of local facilities and infrastructure;
- Any aspiration to achieve other objectives, for example, to alter the housing mix in an area as part of wider regeneration projects.
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Residential Density

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The Local Plan seeks to achieve a balance between the efficient use of land and the provision of high quality residential developments to meet the district's housing needs. The NPPF allows local planning authorities to set their own approach to housing density to reflect local circumstances. It is imperative that in Calderdale, where a significant proportion of new housing will be delivered on land formerly within the Green Belt, that higher densities are utilised to ensure land is used as efficiently as possible.

This is flawed proposal as it just assumes that high density justifies development at any cost just to provide numbers - the loss of amenity, environmental issues and quality of living environments should not be lost to blanket development - greenbelt land can offer opportunities but not at an overall loss to the environment - each site needs careful balanced assessment - back to the design brief arguments.

If land is not used efficiently, it could have the cumulative effect of requiring more land to deliver the scale of housing required, resulting in less sustainable patterns of development.

Sustainable does not mean density - to stress test using greenbelt land the assessment needs to be how much quality of gain is possible - not how much can we shove here because nobody can think of anything better.

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Policy HS2 sets out the Council's minimum net density requirements for all sites. It does however, recognise that there will be sites where higher or lower densities will be more appropriate.

Over the last five years (2011/12 - 2015/16), average densities for new build development has been 44.7dph, and average densities for conversion developments has been 102.9dph. However, these figures include schemes where the density was very high, and unlikely to consistently continue to form a future trend. To provide a more realistic figure, it was considered to exclude schemes where the density was over 100dph. Average density figures for schemes of less than 100dph are 32.4dph for new build developments, and 33.6dph for conversion schemes. The Council therefore considers that a general expectation that a minimum of 30dph should be achieved is not unreasonable. This will greatly contribute to regeneration, protect greenfield and Green Belt sites, and reduce the length of car journeys. Well thought out and designed schemes can assist in increasing residential density.

This process will not happen in a vacuum, there needs to be a lead - a design brief and quality standards or developers will offer the lowest quality for the highest gain - that is the developer business model.

There is today 28.09.2018 an article in The Times that discusses that roughly 217000 homes are being delivered against 300000 target, though house builders are slowing down construction - so LA targets over the next 15 years are likely to be met even with allocations of development land coming forward.

Brexit and the unsustainable method of funding/purchase of new dwellings has already caused a slowing of the housing market - this is predicted to slow further over the next 2 years with monetary and economic uncertainty. 1 in 5 manufacturing businesses are already looking at moving Europe, high end employers will leave the UK, there will be a severe downturn in the economy, output and incomes - it is likely that the housing market could stall in the short term.

There needs to be a realistic national and regional re assessment fo housing and development needs - that should be anticipated but the Local Plan falls short of offering this goal.

Conclusion

We reiterate that the Forum do not come from a position of simply seeking to block development and that there is a full understanding that there will inevitably be some development that is justified and necessary in the area.

We believe in the development of the Forums area but strongly believe it should be the right developments in the right place with the infrastructure to support any proposed development. Accordingly we have attempted to approach this process in a way which can help to shape and amend the planned proposals.

However, since the Local Plan has been prepared without a sound rationale or co-ordinated evidence base, this has simply not been possible. As a result the proposals in the Plan cannot be seen to be credible and the Forum is therefore left with no alternative but to outline, explain, justify and evidence its fundamental and significant concerns. There is no apparent way that the Local Plan in anything near its present form can overcome these concerns.

What is proposed in the Plan does not align with the evidence base that is available to date, notwithstanding the above problem. It further does not align with its own strategic objectives. The Plan proposes a significant change in the proportion of green field versus Brownfield land being used. This does not align with Strategic Objective 4.

The Plan proposes such significant incursions into the Green Belt on the most sensitive sites that it cannot align with Strategic Objective 5 to protect and enhance green infrastructure and the natural environment. The Plan proposes major developments where infrastructure is entirely lacking and unplanned/not committed, without any clear or up to date Infrastructure Delivery Plan. Hence, it cannot align with Strategic Objective 7 regarding transport and providing sustainable solutions. The Plan does not address specific cross-boundary matters of major significance which again are noted in the evidence base to date. There is no co-ordinated approach to considering the Green Belt across neither neighbouring authorities nor how genuine market, transport and other spatial interactions occur. The simplistic approach of each Local Authority meeting its own needs fails to recognise the realities of market and travel interactions across arbitrary Local Authority boundaries. This will lead to an unsustainable pattern of development and travel demand and must be fatal to the sustainability of the Draft Plan as a whole.

The spatial distribution of development is deeply flawed and again does not align with the evidence base as set out.

There are major site specific problems with specific identified Green Belt housing allocations and employment allocations around the Forums area and Brighthouse that need to be properly addressed to even contemplate being released.

The Plan proposes major developments where infrastructure is entirely lacking and unplanned/not committed, without any clear or up to date Infrastructure Delivery Plan. Hence, it cannot align with Strategic Objective 7 regarding transport and providing sustainable solutions.

Such is the impact of these sites on the whole plan Strategy that we consider that the whole Local Plan process and evidence base needs completely reviewing and a new Plan formulating alongside the essential Infrastructure Delivery Plan. The Forum will of course welcome involvement in the formulation of a suitably evidenced plan alongside the necessary Infrastructure Delivery Plan.

The RNF will submit a full Local Plan development scheme which will define where any new housing, mixed use or commercial sites would be best placed to develop the Forums area, what infrastructure is needed to support those developments and means of preserving our rural, green and open spaces for future generations