

Matter 3 Question b and d

The following comments are submitted in relation to my previous comment submissions and provide further evidence following developer comments, the Inspector's questions and Calderdale Council's responses.

Housing requirement Figure/Economic Ambition

Main points

- **Government retain the 840 dpa Standard Method for Calderdale**
 - **UDP housing requirement and longer term of completions should be considered**
 - **Policy-on economic ambition is essentially double the most recent ONS projected change for Calderdale. Economic ambition is not sound.**
 - **The potential for self-perpetuating higher housing requirement figures should be considered in Calderdale's constrained context**
 - **Please see economic ambition section below for further points**
1. I note that several developer comments last year questioned the future Government Standard Methodology and that this has since been resolved, with the Government currently retaining the 840 figure that Calderdale Council's Local Plan is working on.
 2. From the most up-to-date evidence, the housing requirement figure range for Calderdale is 610 dpa (2016-based Government Standard Method) and 1,129 dpa (policy-on economic ambition 2018 SHMA). The economic ambition is almost double the projected change for Calderdale.
 3. Whilst the Government are still retaining the 2014-based projections for their standard methodology so as to achieve the national target, the 2016-based ONS still remains a useful material consideration when considering population projections for each authority.
 4. Each ONS release shows that the population of Calderdale is not growing at the rate it was previously forecast to.
 - 2014-based 5.3% increase over its 10-year period 2014-2024. Natural change approx. 3.1% and migration approx. 2.1%. Population expected at 2033 to be **226,390**
 - 2016-based 3.5% increase (7,229) over its 10-year period 2016-2026. Natural change approx. 2% and migration approx. 1.4%. Population expected at 2033 to be **219,327**
 5. I note the 2018 SHMA (Figure 5.1) uses a longer trend (2002 – 2016) than the ONS, which includes Calderdale's housing boom. It is clear that Calderdale's housing market has been volatile. The housing boom followed by the recession has seen peaks and troughs. These have fed into the ONS. It is therefore appropriate to consider a more stable time before the "ups and downs", particularly the years before the housing boom. A completions table is attached which dates back to 1997 (source: 2017 Draft Local Plan, page 42).
 6. I believe more stable, earlier years of housing supply are a material consideration for Calderdale's housing requirement. They should be taken into consideration for either an OAN figure or the Government's standard method with any uplift (such as for economic

ambition), particularly as the 2018 SHMA chooses to use a longer trend (2002 -2016) to retain the years of oversupply. This will help bring balance to the Local Plan.

7. The UDP, which, crucially, is the last adopted Local Plan tested through examination for Calderdale, which the Local Plan will supersede, aimed to deliver 450 dwellings per year in Calderdale. Although many different housing requirement figures have been suggested over the years, they have yet to be tested through a Local Plan examination and, importantly, for sustainability.
8. It is important to note that the Inspector for the 2006 UDP was critical of the previous over-delivery of housing in her covering letter (no review of the Green Belt was necessary):

“Whilst the housing land supply is sufficient to meet the regional requirement, I am concerned that there appears to be an increasing oversupply which will harm regional regeneration objectives. As a consequence I consider as a matter of some urgency, if a restraint mechanism has not already been put in place, it should be done so in the near future. Because the indications are that there will be an oversupply of housing land for the foreseeable future I have not recommended additional sites be allocated even to replace those allocations which I recommend be deleted.”
9. Subsequently, Policy GH2 of the 2006 UDP was designed to control housing supply. However, the Council continued to exceed the annual housing requirement. At times, over-delivery was around 3 times the annual housing requirement (Please see Table 6.6 2018 SHMA).
10. At the time, the Inspector’s concern was relevant, but ignored. Because housing supply was not controlled by the Council, the subsequent delivery of higher housing figures went on to feed into the ONS figures and became self-perpetuating, by increasing future housing projections. It is only the recession that has slowed this peak down. The delivery of these higher housing figures will have increased pressure on roads/health provision/Co2 emissions/air pollution etc. and, indeed, current Green Belt which is now said to be needed.
11. It is important the Local Plan correctly records the current infrastructure position following this oversupply, including the sustainability/capacity of settlements, before additional housing requirement is assessed for sustainability (please note my comment last year on policies SD1 and SD2). I note Friends of The Earth’s concern and objection comment last year regarding road capacity and transparency.
12. The years before the housing boom saw completions in the 500s and 600s, which were closer to the 450 housing requirement in the UDP.
13. Currently, Calderdale considers that the Government Standard Method of 840 dwellings per annum, an uplift of 390 dpa from the 450 UDP (almost double) is the most appropriate housing figure. The Government Standard Method 2016-based projections would result in an even lower figure of 610dpa. This is the most up-to-date information.
14. It is of note that the result of Government’s consultation on this subject was that 53% of respondents disagreed with the Government’s proposal to not allow the 2016-based household projections to be used as a reason to justify lower housing need (page 7 of

Government's response to consultation). The 610 dpa is more in-line with the stable years before Calderdale's housing boom and recession. It also includes a healthy migration ratio when the 10 years 2016-2026 are considered.

15. An adopted higher housing requirement figure does not just apply for the Local Plan period but can become self-perpetuating, as it feeds into ONS projections, increasing future housing requirements. Any additional reasons for increase within the housing requirement figure could also continue after the plan period, even if they have been addressed within that period (such as past unmet need). This needs to be considered against Calderdale's constraints and capacity.
16. The housing requirement figure should not be increased for economic ambition, as this has not been justified. It should not be increased above 840dpa, as the most up-to-date evidence, the 2016-based projections, are lower than the 840dpa.

Economic ambition

Main points

- **Economic ambition of 8,295 jobs not supported by evidence of supply of workers**
 - **Calderdale's working-age population is decreasing**
 - **Deficit of over 11,000 workers for economic ambition**
 - **Economic activity rate increased to age 89 in SHMA**
 - **Calderdale has never achieved 1,044 net migration per annum**
 - **2016 ONS should still be a material consideration**
 - **The economic ambition is essentially double the current projected change for Calderdale**
 - **The Local Plan does not show whether the economic ambition is sustainable or achievable**
 - **IDP only specifically for 5 years. Currently, no concrete health provisions. This should be considered against a large ageing population and a possible need for 1,044 net migration per annum**
 - **Calderdale's economic ambition figures do not appear to come from LCR SEP**
17. The Local Plan has not provided evidence of how its economic ambition of 8,295 jobs can be achieved.
 18. 2012 NPPF Para 182 "Justified - the plan should be the most appropriate strategy..." The Local Plan has not got an appropriate strategy, as the economic ambition of 8,295 job growth has not been supported by evidence of supply and Calderdale's working-age population is declining.
 19. Economic Activity Range has increased and is now 16 – **89** (Council's response to Inspector, Turley para.11 2018 SHMA page 32 para 5.7 and).
 20. There is no explanation for this increase. Workers up to age 89 raises achievability questions for supplying the Council's job growth ambition. It is not known how this may have affected the various output figures in the SHMA. I also question the use of this increased number within the documents to support the case for a higher housing requirement, which will inevitably be on Green Belt land, which needs to be based on exceptional circumstances.

21. *The 2018 SHMA, Table 5.3 and 5.2, shows baseline Employment growth would require 790 net migration per annum (496 jobs pa and 1,001 dwellings pa), whilst “Policy-on” employment growth would require 1,044 net migration per annum (656 jobs pa and 1,129 dwellings pa) over the period 2016 – 2035.
22. Calderdale has never achieved the 1,044 net migration which would be needed for the Policy-on scenario. It has only ever achieved more than the Baseline scenario of 790 in the 2 years 2006 to 2008, during its housing boom years.
23. The ONS 2016-based population projections are still a material consideration, particularly when considering the supply of working-age population in Calderdale is set to decline, but the Council has an economic ambition of 8,295 jobs. The 18 – 65 age group is projected to decline by 3,534 by 2033 (Table 1 Duty to Co-operate Statement). Adding this to the 8,295 job growth ambition gives a **deficit of 11,829**.
24. The downward trend of the increase in Calderdale’s population is seen at each release of ONS projections. This gives reason to believe that this will continue.
25. To achieve economic ambition through increased population, firstly, this would need to bring migration well above the natural change of Calderdale.
26. Currently, the approximate projected ratio of natural change to migration is higher as shown below:
 - 2014-based 5.3% increase over its 10-year period 2014-2024. Natural change approx. 3.1% and migration approx. 2.1%. Population expected at 2033 to be 226,390
 - 2016-based 3.5% increase (7,229) over its 10-year period 2016-2026. Natural change approx. 2% (**4,282**) and migration approx. 1.4% (**2,821**). Population expected at 2033 to be 219,327.
27. *For a 10 year period, the 2018 SHMA would calculate a Baseline employment growth requirement of **7,900** migration and Policy-on would require **10,440** migration. This equates to **2 to 2.5 times** the natural change of the district.
28. From the most up-to-date evidence, the housing requirement figure range for Calderdale is 610 dpa (2016-based Government Standard Method) and 1,129 dpa (policy-on economic ambition 2018 SHMA). The economic ambition is almost double the most recent projected change for Calderdale. Over the Local Plan period this equates to 9,150 and 16,935 respectively.
29. Achieving economic ambition through increased population raises many questions which have not been addressed, such as achievability and sustainability.
 1. Is this sustainable, given:

Calderdale’s roads/congestion, topography, environment, air pollution, Co2 emissions/Green Belt etc.

The 2019 IDP states it is only specifically for 5 years of the Local Plan period.

The IDP has no concrete health provisions (2019 IDP Para 2.3 and 10.1). considered against an increasing ageing population of 13,684 between 2016 – 2033 combined with a proposed high level of migration (up to 1,044 pa), both accessing limited health care facilities. I believe this tension, with the likely shortage of health care, for a district with a high ageing population, should be addressed before housing requirement figures are decided.

2. Is the job growth ambition of 8,295 achievable given:

The working-age population is set to decrease by around 3,500 by 2033

Unemployment in Calderdale is low

30. 2018 SHMA identifies a need of between 790 and 1,044 net migration for economic ambition but is this sustainable, given that:

Brexit and international migration controls will likely reduce the supply of migration.

If other districts are meeting their own needs, where are the workers coming from?
Double counting populations could just result in an exercise of releasing more land from the Green Belt?

31. The housing requirement figure should not be increased for economic ambition given the points above.

32. The council have indicated by email that they could retain workers. I am not sure of the realistic scale of this for several reasons, including competition for workers from say Leeds, whose economy is booming.

33. I also note that Friends of The Earth have ascertained that the relationship between the planned level of employment growth for Calderdale and the LCR SEP cannot be known.

Employment Land Allocation

34. The Local Plan allocates 97ha for employment land. If the economic ambition is not fulfilled, then it is likely more employment sites will be lost to housing. This will impact on resources, services and facilities etc. This also has the potential to lead to a higher housing requirement figure in the future.

Council approval

35. Following the Council's decision not to increase the housing requirement figure for Employment Growth (Cabinet 12 February 2018), both the employment land allocation and job growth figure were increased (to 97ha and 8,295 jobs) within Agenda Item 7 of the 11 June 2018 Cabinet meeting (some 4 months after the Cabinet's decision not to increase):

“2.1 The Local Plan has reached the stage where officers consider that it is ready for publication. The decision to publish must be made by Council following a recommendation from Cabinet.”

36. The decision for this increase was not discussed with Councillors beforehand at a Local Plan Working Party or following the 2017 Draft Local Plan consultation (when the figures were lower at 60ha employment land and 5,955 jobs).
37. Because of this, the housing requirement figure should not be increased for economic ambition.

NPPF

38. I am concerned that it was not made clear, at last year's consultation, which NPPF document the Local Plan was to be tested against. I believe it is not the Government's intention that Local Plans caught between 2 versions of the NPPF should be tested on a "worst of both worlds" basis. There is a danger that, by crossing between the two, the mechanisms provided in each NPPF to protect the environment (such as NPPF 2012 Para 14 relating to Green Belt and Para 182 the most appropriate strategy or NPPF 2019 focusing on utilising brownfield and higher densities) may not be taken into account. This is particularly relevant to Calderdale, given its various constraints and the majority of proposed new development being on Green Belt land.
39. I feel these important issues for Calderdale should be decided now by the Inspector and not at a 5-year review.

SHMA and ELS

40. The average household size in Calderdale at the 2011 Census was 2.28 (2015 SHMA Figure 4.12).
41. At face value, the average household size for comparison for the different economic ambitions appears to be much lower than the 2011 Census average.
42. 2018 SHMA Table 5.3 The average household size when comparing population change with household change appears to be 1.54 for Policy-on employment growth and 1.43 for Baseline employment growth. If correct, these low household sizes should not be used as they will effectively be a basis to remove more Green Belt land.
43. There is no direct reference in the 2018 SHMA to the 8,295 jobs planned in the Local Plan. There appears a discrepancy with the Local Plan years in the 2018 SHMA. Indeed, Barton Wilmore are quoting job growth figures for the Local Plan period from the 2018 SHMA. However, para 4 of the 2018 SHMA uses an anticipated timeframe for the Local Plan of 2016-2035. Calderdale's Local Plan only runs until 2033. This appears to undermine assumptions in the SHMA. For example, para 5.19 notes that 9,430 jobs will be created in Calderdale over the emerging plan period (SHMA 2016 – 2035).
44. The following paragraph from the 2018 SHMA appears incorrect as the Local Plan period does run until 2033.
45. 4.27 "The long-term demographic scenario presented in the SHMA was modelled only to 2033, and therefore cannot be directly compared over the revised plan period (2016 – 2035)."

46. The most recent Calderdale Employment Land Study, June 2018 is not linked to the most recent May 2018 SHMA, but is based on the 2015 SHMA (please see paragraph 7.35 ELS). Therefore, its assumptions and outputs, which feed into the Local Plan and its Evidence Base, are not based on the latest evidence supplied in Calderdale's May 2018 SHMA (dated before the ELS). The 2015 SHMA uses the earlier, higher, 2012-based ONS projections.