

**Cabinet Meeting: Monday, 04 August 2025**

**Question from: Anthony Rae**

**Question to: Councillor Scullion, Leader of the Council**

**QUESTION**

*[abbreviated '1 minute' version]*

The community groups who contested Calderdale's Local Plan 2018-33 argued that its proposal to allocate the area of 500+ football pitches of Green Belt land [1] to build a total of 15,000 new houses could not be justified seeing that Calderdale's future population had already stopped growing. The Council on the other hand claimed that because it wished to increase the number of local jobs by 10,000 it was necessary to attract 19,000 new people which would have to be housed.

2 years on, the latest ONS statistics indicate that the community groups have been proved right and the Council was spectacularly wrong: Calderdale's population in 2032 will be the same as it was in 2018 [2]; employment levels now have fallen, not increased [3]; and the district's actual housing delivery rate remains way below the Local Plan trajectory [4].

Will the Council agree to start the LP 5 year review process with a consultation in 2026 that acknowledges the real world trends affecting the population, employment, and housing delivery numbers and allows a critique of the underlying modelling approach which generated this extraordinary cock-up for Calderdale?'

*[Full version of the question]*

This is a question to the Leader of the Council about Calderdale's Local Plan 2018-33, the key strategy for the future of the district. Before its adoption in March 2023 the Plan was fiercely contested by environmental & community groups who argued that its proposal to allocate the area of 500+ football pitches of precious Green Belt land [1] to build a total of 15,000 new houses could not be justified on the evidence, seeing that Calderdale's future population had essentially already stopped growing. The Council on the other hand, by means of manipulated modelling, claimed that because it wished to increase the number of local jobs (for some unknown reason) by 10,000 it was therefore necessary to attract 19,000 new people from unknown locations, which therefore would have to be housed.

2 years on, the latest ONS and official statistics indicate that the environmental/community groups have been proved right and that the Council was spectacularly wrong: Calderdale's population in 2032 will be the same as it was in 2018 [2]; employment levels now have fallen, not increased [3]; and the district's actual housing delivery rate remains collapsed way below the Local Plan trajectory [4]. It's now impossible for the council's numbers, which drive so many other aspects of the Plan, to magically bounce back and be achieved by 2033.

The fact that the core strategy for the district's future was based on fantasy numbers - that therefore the Local Plan predicts a next decade for Calderdale that simply will **not happen** - is a huge failure of the Council, its leadership and officers, and a tragedy for beloved local environments. With the Local Plan coming up for its 5 year review in spring 2028, will the Council agree to start that review process with a consultation in 2026 that acknowledges the real world trends affecting the population, employment, and housing delivery numbers; and also allows community groups the opportunity to critique the underlying modelling approach which generated this extraordinary cock-up for Calderdale and which **cannot** continue uncorrected? '

Anthony Rae  
30th July 2025  
*c.c other party leaders on Calderdale Council*

#### Sources

[1] 'The Council has identified that 489 hectares would be released from the Green Belt. This includes some 371 hectares of land for housing and employment allocations (including the additional housing allocations).' *Inspector's report paragraph 102*. 371 hectares is the equivalent of 520 football pitches.

[2] ONS 2022 based subnational population projections, released on 24 June 2025: [www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/subnationalLocalPlanpopulationprojectionsforengland/2022based](https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/subnationalLocalPlanpopulationprojectionsforengland/2022based) and then scroll down to local authority area look-up under sections 3 and 6 . The Calderdale Friends of the Earth evidence to the Local Plan examination in public pointed out that the successive ONS population projections (2008/2010/2012/2014/2016/2018-based) showed a continuous downward trend for Calderdale's forecast population in 2032: from 240,000 to 214,000. The 2020-based projection was not produced. The new 2022-based projection continues the downward trend to just **210,348** in 2032 (preferred 'migration category' scenario). Calderdale's actual population in 2018 was **210,700** *Calderdale Local Plan table 2.4* but according to the new ONS projection was just **207,660** in 2022. The new ONS projection has the 2032 Calderdale population from all UK sources reducing by 1,563 in the 10 years 2022-32; when international migration is included there is a very small net increase of 2,688.

[3] [www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/articles/employmentunemploymentandrelatedstatisticsforyourarea/2023-10-05](https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/articles/employmentunemploymentandrelatedstatisticsforyourarea/2023-10-05) (but published 4th July 2025), then use the local authority look-up for Calderdale sheet 1 column D [www.ons.gov.uk/visualisations/labourmarketlocal/E08000033](https://www.ons.gov.uk/visualisations/labourmarketlocal/E08000033): row 69 Calderdale employment 2018 – 97,075; Calderdale employment in 2024 - 96,725 (moving averages, rows 69-72 and 89-92).

[4] The number of actual housing completions for the first 7 years of the Plan period (see table below, prepared from council data) been compared to the Local Plan housing requirement policy SD2, as quantified in table 6.2 'housing requirement and sources of supply', and displayed in figure 6.1 'Calderdale housing trajectory 2018-33'. Only 2,734 new dwellings have been achieved compared to required cumulative

completions of 3,855. In the remaining 8 years of the Local Plan to 2033, Calderdale would be required to make good a shortfall of 9,673 dwellings - that is, an annual average of 1,209 net additions - of which 8,029 are meant to be newbuild on the Local Plan allocated sites. This would require an increase of 269% in the annual average rate of newbuild completions: from 272 to 1004 per annum.

#### *Calderdale housing completions 2018-25*

	<i>Newbuild completions</i>	<i>other nett gains</i>	<i>nett additional dwellings</i>	Local Plan requirement	annual shortfall against LP	cumulative shortfall
2018-19	327	224	571	557	-14	-14
2019-20	252	110	362	348	-14	-28
2020-21	151	127	278	264	-14	-42
2021-22	279	164	443	648	205	163
2022-23	325	7	332	681	349	512
2023-24	341	70	411	555	144	656
2024-25	226	111	337	802	465	<b>1121</b>
			<b>2,734</b>	<b>3,855</b>		

### **Response**

The Council considers that Mr Rae's questions are predicated on a misreading of National Planning Policy as it existed at the time of the Local Plan Examination and now in 2025. In particular, he overlooks the longstanding expectation that councils must plan positively for the delivery of housing.

The specific answers are set out under each question/point below:

- 1) *"The community groups who contested Calderdale's Local Plan 2018-33 argued that its proposal to allocate the area of 500+ football pitches of Green Belt land [1] to build a total of 15,000 new houses could not be justified seeing that Calderdale's future population had already stopped growing. The Council on the other hand claimed that because it wished to increase the number of local jobs by 10,000 it was necessary to attract 19,000 new people which would have to be housed."*

**CMBC response:** The local plan actually allocated land for 10,661 dwellings, and not all of which were on former Green Belt Land. In fact, the amount of land removed from the Green Belt and allocated for development in the Local Plan represented 1.6% of the total Green Belt under the previous plan.

- 2) *"2 years on, the latest ONS statistics indicate that the community groups have been proved right and the Council was spectacularly wrong: Calderdale's population in 2032 will be the same as it was in 2018; employment levels now have fallen, not increased; and the district's actual housing delivery rate remains way below the Local Plan trajectory."*

**CMBC response:** The new standard methodology for housing requirements that the

Government introduced in late 2024 moved away from using population projections and instead focuses on existing stock and affordability factors as the basis for calculating requirements. The Local Plan's annual housing requirement is close to the new methodology's requirement for Calderdale. When reviewing the Local Plan, the council will be required to follow National Policy. The Government published a response to the consultation on the new standard method which is available to view at Gov.uk - [Government response to the proposed reforms to the National Planning Policy Framework and other changes to the planning system consultation - GOV.UK](#)

- 3) *"Will the Council agree to start the LP 5 year review process with a consultation in 2026 that acknowledges the real world trends affecting the population, employment, and housing delivery numbers and allows a critique of the underlying modelling approach which generated this extraordinary cock-up for Calderdale?"*

**CMBC response:** The Council is required through National Planning policy to complete a review of the Local Plan within 5 years of adoption. Officers are establishing a programme to carry out the review within the required time frame. The review will be carried out in line with the updated National Planning Policy Framework which expresses the Governments ambition for housing growth.

This question is couched in terms that do not reflect the new standard method for calculating housing requirements (which as stated above has moved away from population projections). The Council obviously cannot adopt an approach to this issue that is inconsistent with the policy objectives and methodologies set out nationally by the Government.

The housing trajectory set out in policy SD2\* of the Local Plan differs from those figures presented by Mr Rae in his table titled *Calderdale housing completions 2018 to 2025*. The latest figures can be viewed in the council's Housing Land Supply Monitoring Report 2023/2024 (Published January 2025) - [Calderdale Council - Housing Land Supply Monitoring](#)

\*Local Plan Housing Trajectory

Period 1: 2018/19 – 2025/26 = 500 dwellings per annum

Period 2: 2026/27 – 2027/28 = 950 dwellings per annum

Period 3: 2028/29 – 2032/33 = 1,810 dwellings per annum

Further clarification would be required in relation to the source of the figures in the table provided by Mr Rae for officers to respond to that specific part of the question.