

# CALDERDALE LOCAL PLAN

## Exceptional circumstances for the release of Green Belt

### Technical Paper

## Calderdale Metropolitan Borough Council 2018

Amended February 28 2019



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NB: Appendix 2 Added, February 28 2019

## **1. Introduction**

- 1.1 The historic background to the creation and review of the Green Belt in Calderdale is set out below.
- 1.2 The boundaries of the Green Belt in Calderdale were identified in the late 1950s by the former West Riding County Council and Halifax County Borough Council. The Green Belt extends around all the settlements within Calderdale, with the exception of Todmorden, due to the western limit of the West Yorkshire Green Belt being formed by the Pennine Way, which crosses the Upper Valley between Hebden Bridge and Todmorden. The area around Todmorden was not seen to fulfil the criteria for including land within the Green Belt. The only Green Belt, formally approved by the Secretary of State at this time, was Brighouse, approved in 1966. The rest of the Green Belt in Calderdale was approved on an interim basis. Within these areas, development was subject to the same controls as were applied to the formally approved Green Belt.
- 1.3 The West Yorkshire Structure Plan was approved by the Secretary of State in July 1980 and came into force in August 1980. This showed the general extent of Green Belt within West Yorkshire, and incorporated the original Green Belt areas from the earlier plans of the West Riding County Council and the Halifax County Borough Council. In order to provide detailed Green Belt boundaries the Calderdale Green Belt Subject Local Plan was prepared by the West Yorkshire Metropolitan County Council during 1984. A Public Local Inquiry into objections on the Local Plan was held in October 1985, and the Inspector's report was presented to the County Council in March 1986. However, in view of the abolition of the Metropolitan County Council, the Secretary of State called in the Local Plan on 20 March 1986 to enable it to be considered further. In March 1989 the Secretary of State for the Environment, approved the Calderdale Green Belt Subject Local Plan, which provided detailed boundaries for Calderdale.
- 1.4 During preparation of the Calderdale Unitary Development Plan (UDP), 1990/91, it was considered that a substantial review of Green Belt was inappropriate and unjustified, given that the boundaries had only recently been approved. The boundaries of the Green Belt Subject Local Plan were generally unchanged, and were incorporated within the UDP, with the exception of a few changes to accommodate economic activity. However, it was anticipated that a Green Belt review may be required as part of the first review of the UDP, particularly if it was demonstrated that a need arising from a shortage of housing and industrial land could not be met within the urban areas.

- 1.5 The major changes to national policy that came forward after 1997, particularly with respect to the use of “brownfield land” and increasing the density of development, indicated that a major review of Green Belt was not necessary within the First Review of the UDP, the Replacement Calderdale Unitary Development Plan (RCUDP), adopted August 2006. Likewise regional policies and guidance, contained in the Regional Planning Guidance (RPG12), and the Regional Spatial Strategy 2004 (RSS), did not require a strategic review of Green Belt boundaries in the Region.
- 1.6 A further change to the Green Belt also occurred during the RCUDP process. This recognised the difficulties and inconsistencies caused by the tightly drawn boundaries of the Green Belt around some parts of the urban area. In some locations the Green Belt boundary followed irrational, arbitrary lines, or features on the Ordnance Survey Mapping, which bore no relationship to circumstances locally or features on the ground. It was considered appropriate, therefore, to make minor alterations to the Green Belt boundary in order to remove irregularities, reconcile different approaches in different parts of the District, and to take account of circumstances on the ground. It should be noted that the changes were not introduced to facilitate development but to provide a realistic and pragmatic approach to the boundary of the Green Belt throughout the District.
- 1.7 The Council followed a variety of principles to ensure that the amendments to the Green Belt boundary were necessary and did not materially harm the fundamental aims of Green Belt Policy. This is outlined in the document ‘Minor Changes to the Green Belt’ which was produced by the council in 2002 as part of the RCUDP evidence base.
- 1.8 In 2016 the Council published a Green Belt Review (based on a methodology published in 2015) to provide an understanding of the current strengths and weaknesses of the existing Green Belt and provide evidence to support recommendations to change the Green Belt. The Green Belt Review was undertaken using a policy neutral approach and as such it did not seek to identify sites for development or justify potential sites that had already been identified.

## 2. Policy context

2.1 The policy context for this matter is established by paragraph 83 of the National Planning Policy Framework (NPPF), which states that:

*Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. [CMBC underlining]*

2.2 In February 2017 the Government published the White Paper *Fixing our Broken Housing Market*. Paragraph 1.39 of the White Paper stated that:

*The Government wants to retain a high bar to ensure the Green Belt remains protected, but we also wish to be transparent about what this means in practice so that local communities can hold their councils to account.*

*Therefore we propose to amend and add to national policy to make clear that:*

- *authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including:*

- *making effective use of suitable brownfield sites and the opportunities offered by estate regeneration;*
- *the potential offered by land which is currently underused, including surplus public sector land where appropriate;*
- *optimising the proposed density of development; and*
- *exploring whether other authorities can help to meet some of the identified development requirement.*

- *and where land is removed from the Green Belt, local policies should require the impact to be offset by compensatory improvements to the environmental quality or accessibility of remaining Green Belt land...*

2.3 The themes introduced in the White Paper are carried through to the *National Planning Policy Framework Draft text for consultation* (March 2018) (NPPF DTC). The NPPF DTC states that:

*135. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or updating of plans. Strategic plans should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been demonstrated through a strategic plan, detailed amendments to those boundaries may be made through local policies, including neighbourhood plans.*

*136. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic plan-making authority should have examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of the plan, which will take into account the preceding paragraph, and whether the strategy:*

*a) makes as much use as possible of suitable brownfield sites and underutilised land;*

*b) optimises the density of development, including whether policies promote a significant uplift in minimum density standards in town and city centres, and other locations well served by public transport; and*

*c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.*

*137. When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic plan-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt*

*can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.*

2.4 The NPPF DTC is presently (as of July 2018) in draft form and subject to public consultation. In view of this it provides an indication of the direction of travel of national planning policy rather than a statement of current planning policy. Furthermore, it is expected that Calderdale will submit its Local Plan to the Secretary of State within the 6 month transitional period. The Local Plan is therefore likely to be examined in accordance with the current NPPF.

2.5 Whilst acknowledging the factors outlined in paragraph 2.4 above, the Government is clearly seeking to address the hitherto lack of direction on establishing exceptional circumstances. It is therefore considered that it is appropriate to utilise this emerging policy for the current purposes. Taking the above into account, this document addresses the issue of exceptional circumstances from the perspective of the following considerations:

- 1) Is the identified need for development justified?
- 2) Does the proposed distribution represent a sustainable pattern of development?
- 3) Does the strategy make as much use as possible of suitable brownfield sites and underutilised land?
- 4) Does the strategy optimise the density of development in town centres and locations well served by public transport?
- 5) Has the strategy been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development?
- 6) Has the strategy explored the ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land?

In addition to the above criteria that reflect emerging national planning policy, this document will also consider:

- 7) Whether the governance of the Local Plan process has minimised the need to release land from the Green Belt?

2.6 These criteria are considered individually in the section below.

### 3. Assessment of exceptional circumstances

#### The need for development

3.1 The Council considered five different potentially justifiable options for housing requirements. These are summarised below and further information is provided in Appendix 1.

A) Initial Draft Local Plan (2017 consultation) – includes “undersupply” (13,286 allocations)
B) Proposed Standard National Method – no “undersupply” (9,015 allocations)
C) Proposed Standard National Method including uplift to make up “undersupply” for 2016-2018 (9,945 allocations)
D) Proposed Standard National Method incorporating uplift for “undersupply” and indicative employment growth (11,055 allocations)
E) Proposed Standard National Method incorporating uplift for “undersupply” and indicative employment growth and additional flexibility recognising the need to boost supply (11,685 allocations)

3.2 These options were considered by the Council’s Cabinet on 12<sup>th</sup> February 2018 and Members elected to endorse option B – i.e. the proposed standard national method for calculating housing requirements with no adjustment for employment growth or undersupply. This option reflects demographic change but does not include any other form of uplift. It should be noted that option B has the least impact on the Green Belt compared to the four other options – a reduction in area of 1.7% compared to 2.2% for option A.



- 3.3 In terms of housing need in Calderdale, provision is made for 12,600 dwellings to be delivered within the district between 1<sup>st</sup> April 2018 and 31<sup>st</sup> March 2033. This translates to 840 dwellings per annum.
- 3.4 In terms of the requirement for employment land the Council commissioned an Employment Land Study (ELS). The ELS concluded that the objectively assessed need for employment land is 73ha within the Plan period. The Local Plan seeks to achieve this growth by allocating sites for development for B1, B2 and B8 employment uses, and by protecting existing employment land and premises.
- 3.5 The supply of suitable modern premises for 'B' Class employment use is limited by topography, flooding and varying quality of road access. In view of this demand for sites is highest and employment development is most viable in southeast Calderdale close to the M62 motorway.
- 3.6 The need to allocate sites for 'B' Class employment uses in Calderdale is driven to a great extent by the requirement of existing employers, particularly manufacturers, to relocate from sub-standard premises (often in floodplains) to modern facilities. In relation to this a significant proportion of the employment growth identified in the ELS is in non-manufacturing sectors.
- 3.7 In conclusion, the scale of housing and employment development proposed by the Local Plan is commensurate with our objectively assessed needs. This reflects the fact that the Council's decision making has to a great extent been influenced by an explicit objective to minimise the loss of Green Belt.

### **Sustainability of the distribution**

- 3.8 The distribution of development is described in chapter 6 of the Local Plan, and further explored in the document *Justification for southeast Calderdale Garden Suburbs*. The *Site Allocations Assessment Methodology* (July 2017) (SAAM) describes the process that the Council adopted for the identification and assessment of potential allocations. Matters of sustainability are considered in the SA/SEA. The exceptional circumstances for the release of Green Belt need to be considered in conjunction with the aforementioned documents.
- 3.9 In accordance with paragraph 7 of the NPPF there are three dimensions to sustainable development - economic, social and environmental. This is explicitly acknowledged in the SAAM (see paragraph 1.3).

3.10 In August 2016 the Local Plan Working Party (LPWP) considered a report on the *Distribution of Growth*. This report is attached as Appendix 2. The report explored six different notions for the distribution of development. Whilst the numbers themselves have been superseded, the report does demonstrate the manner in which the Council has grappled with alternative approaches, with a view to identifying the most sustainable option. In relation to this the report stated that:

3.21 *The individual site assessments will be a very important part of coming to a view on distribution. There is an expectation that where suitable “brownfield” sites are assessed these will have a higher potential for being allocated than similar greenfield sites. The “Brownfield First” principle remains a driving force on site assessment, even though the NPPF (paragraph 17) only requires council’s to “encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value”. As the site assessment process rolls forward the implications for the use of brownfield and greenfield land and the Green Belt will become much clearer.*

3.22 *How to achieve any of the notional growth depends upon a mixture of smaller readily available sites together with potentially longer time-frame Sustainable Urban Extensions (SUEs) [identified as ‘Garden Suburbs’ in subsequent iterations of the Plan]. Considerations of SUEs as a way forward of providing for a sustainable future was first raised in the consultation in autumn 2015. A number of towns were identified as having the scope to contribute to increased growth and deliver sustainable development through the options to potentially accommodate a SUE. Consideration of the comments made during the autumn consultation together with further work relating to the transport evidence and Habitats Regulations Assessment has raised questions over some of the potential SUEs. As a result, the opportunities to facilitate the scale of development that is required are increasingly becoming more focussed upon parts of eastern Calderdale including Brighouse and parts of northern Halifax, as previously mentioned in paragraph 3.17. In order to further explore potentiality around Brighouse, further work is in preparation to explore the opportunities and problems associated with enhanced development potential in the Brighouse area.*

3.11 It was in the above context that the SAAM was refreshed in 2017. The achievement of a sustainable distribution has been driven in part by the application of high level planning principles – the ‘top-down’ approach; however, consideration of practical environmental, economic and social issues has equally influenced the distribution through the application of ‘bottom-up’ criteria. In relation to this the SAAM identified the following stages of site assessment:

1. Site Identification
2. Suitability
3. Development Potential
4. Sequential Approach
5. Availability
6. Achievability

Stage 1 gathers the sites required for Stage 2 and 3 which identifies the suitability for development. Stage 4 ensures the sites chosen are in line with a sequential approach to put forward the best sites first. Stage 5 tests whether the site is actually available for development and Stage 6 assesses the viability of the site.

3.12 An important theme in consideration of the spatial distribution of housing development has also been the relative merits of a larger number of more modest allocations ‘pepper-potted’ throughout the district versus a smaller number of larger strategic allocations. This issue has been explored at a number LPWPs and public workshops. Ultimately it was concluded that Calderdale needs a balanced portfolio of sites in order to achieve an acceptable trajectory - smaller more straightforward sites that can deliver earlier; and larger, more transformational sites to achieve overall OANs and regeneration/infrastructure benefits. Several strategic allocations were not taken forward as part of the Local Plan due to concerns about impact on ecology (west of Halifax) and the merging of settlements (land north of Elland/south of Halifax). This has left the two Garden Suburbs in southeast Calderdale as the Council’s key strategic housing allocations.

3.13 In conclusion it is considered that Calderdale has followed a process that reconciles three dimensions of sustainability.

### **Use of brownfield sites and underutilised land**

3.14 Stage 4 of the SAAM methodology incorporates a sequential approach to the selection of sites.

3.15 In order to identify the most sustainable sites a 'sequential' approach to housing allocations has been adopted that prioritises brownfield sites in the urban area, only using the most sensitive Green Belt when all alternative sites were used. The sequential priority for selection of sites is set out below:

1. Brownfield (BF), Within Urban Area;
2. Mixed BF/Green Field (GF), Within Urban Area;
3. Greenfield, Within Urban Area;
4. Brownfield, Within Green Belt;
5. Green Belt (Meets 0-2 of the identified statutory purposes of Green Belt), Outside Special Landscape Area (SLA), GF/BF;
6. Green Belt (Meets 0-2 of the identified purposes), Within SLA, GF/BF;
7. Green Belt (Meets 3-5 of the identified purposes), Outside SLA, GF/BF;
8. Green Belt (Meets 3-5 of the identified purposes), Within SLA, GF/BF

In order to identify land falling into categories 4 to 8 above, the results of the Green Belt Review were incorporated into the assessment.

3.16 The sequential approach enabled all of the available sites to be placed in a ranked order, and this has meant that for any given housing requirement scenario the most sustainable sites can be selected and the impact on the Green Belt minimised.

3.17 In terms of employment allocations the physical characteristics of Calderdale have made it difficult to identify sufficient suitable and deliverable sites (a number of existing employment sites in the Calder Valley have following the catastrophic flood of Boxing Day 2015 become wholly unusable for continued employment use and certain occupiers have struggled to find alternative premises). It is acknowledged that there is a market for second-hand employment sites; and there are several examples of very successful mill conversions to offices and other employment uses (the foremost example being Dean Clough on the edge of Halifax Town Centre). However, the practical reality of the situation is that suitable and deliverable new B2-B8 employment sites will generally be greenfield and ideally close to the strategic road network.

3.18 To provide sufficient employment land Calderdale has had to identify sites that are currently in the Green Belt. That said it is important note that the Council's largest and strategically most significant employment site (the Enterprise Zone at Clifton near junction 25 of the M62) is not allocated as Green Belt.

## **Optimising density**

- 3.19 National planning policy seeks to optimise the density of development in town centres and locations well served by public transport. Policy HS2 of the Local Plan takes this further by establishing a basic expectation that development will be at net densities of at least 30 units per hectare, with a requirement for higher densities in town centres and close to main public transport routes and hubs.
- 3.20 It is difficult to set prescriptive standards for the higher densities that are expected within town centres and around public transport facilities because these sites present widely varying constraints and opportunities, and will often be developed for a mix of uses. That said it can be seen from the site assessments that high densities have been assumed for the purposes of individual site capacities examples including:
- Cow Green Car Park, Halifax (LP0652) Net Dwellings per Ha 414
  - Rear of 9A Birds Royd Lane, Brighouse (LP0571) Net Dwellings per Ha 262
  - George St, Rastrick, Brighouse (LP1322) Net Dwellings per Ha 187
  - 126-128 Bradford Road, Brighouse (LP0579) Net Dwellings per Ha 144
  - Land at Stoney lane, Hebden Bridge (LP1503) Net Dwellings per Ha 93
  - High Level Works, Pellon Lane, Pellon (LP0164) Net Dwellings per Ha 89
- 3.21 In terms of employment development, the density of B2-B8 is dictated by commercial and operational requirements and cannot therefore be subject to a reasonable expectation of densification. However, a number of former textile mills have been converted to office use, and these have achieved high densities of employment – typically employing more people than they did in their former uses.
- 3.22 In conclusion the assessment of sites and the drafting of the Local Plan have been such that the need to release Land from the Green Belt has been minimised.

### **Discussions with neighbouring authorities about accommodating some of the identified need for development**

- 3.23 Calderdale is part of the Leeds City Region (LCR) and a member of the West Yorkshire Combined Authority (WYCA). The LCR has a well-established programme for joint working and cooperation at both member and officer levels – planning portfolio holders and heads of planning meeting regularly, and there is specific ‘duty to cooperate’ group attended by planning policy officers. Pursuant to this way of working, jointly commissioned LCR wide housing and employment market studies have recently been completed.

- 3.24 All of the LCR planning authorities face essentially the same pressures on account of Green Belt, and as such it has been agreed that each authority will accommodate their own identified needs (see Statements of Common Ground).
- 3.25 To the west Calderdale borders on Greater Manchester and Lancashire. Whilst we have discharged the duty to cooperate with these authorities, there is very little in the way of housing and employment market cross-over to the west (presumably on account of the intervening Pennine hills). Irrespective of this, these authorities are themselves constrained by the Green Belt around Manchester. As such it is not considered appropriate to negotiate with them to take any of our identified growth.
- 3.26 In conclusion it is not considered that there is any scope for Calderdale’s identified need for development to be accommodated in other areas.

**Offsetting through compensatory improvements**

- 3.27 Calderdale Council is currently making progress on a number of environmental improvement projects in the Green Belt:

Cromwell Elland	Bottom,	Country park on former municipal landfill site
Brearley Mytholmroyd	Fields,	Sustainable drainage, biodiversity and public access on site of former playing fields badly affected by flooding
Ryburn Greenway	Valley	Walking and cycling route

- 3.28 In relation to the two Garden suburb sites identified in the Plan (Policy IM7) establishes that the Council will expect masterplans to demonstrate how the design will achieve enhanced public access to high quality open space. This enhanced access might be to areas of open space within the allocation; however, equally, it could also allow enhanced access to areas of Green Belt beyond the boundary of the site.
- 3.29 Further to the above it should be noted that Policy GN1 of the Plan establishes that the Council will put mechanisms in place to secure Green Infrastructure provision in the Borough; and Policy GN2 establishes that the Council will ensure that the Green Infrastructure network is joined up. It is acknowledged that these policies are expressed in very general terms; however, they do provide further assurance that the Council is committed to enhancing the environment of the Green Belt.

- 3.30 At several stages in the preparation of the Local Plan the possibility of extending the Green Belt into the area of countryside around Todmorden was discussed informally; however, this option was not progressed because it was considered that this would not comply with the national planning policy on the creation of new Green Belt in the NPPF.
- 3.31 In conclusion it can be seen that the Council is committed to supporting and implementing projects that will offset at least a proportion of the impact on the Green Belt.

### **Governance of the Local Plan process**

- 3.32 The need to remove land from the Green Belt has been one of the key issues of concern to communities and councillors during the preparation of the Local Plan. This level of concern has manifested itself through the particularly detailed consideration of the Green Belt on a number of occasions by the LPWP and the Council's Cabinet. As a result of this there has been a robust process of 'check and challenge'.
- 3.33 At the LPWP the method for and results of the Green Belt Review; the availability of town centre and previously developed land; and the density of development were variously discussed. Members were very clear to officers that the loss of Green Belt had to be minimised, and ultimately Cabinet selected the housing requirement option with the least impact on the Green Belt.
- 3.34 In conclusion the political governance and oversight of the Local Plan process has ensured an outcome that meets the identified need for development whilst minimising the release of Green Belt.

## **4 Where we are Setting out the Exceptional Circumstances to Change the Green Belt**

- 4.1 The extent of the revised Green Belt is identified on the Policies Map. Overall, no loss has been experienced in the total area of the Area around Todmorden which measures 8,769ha. However, there is a loss of 408ha with the 22,821ha of Green Belt in the Unitary Development Plan being reduced to 22,413ha in the Local Plan. Of this loss, the removal of Village Envelopes to inset settlements accounts for 79ha and allocations for development 302ha. The remaining 27ha of Green Belt Loss can be attributed to minor alterations to the Green Belt boundary in order to remove irregularities and to take account of circumstances on the ground.

Land will be removed from the Green Belt at:

- Land East of Manor Drive, Hebden Bridge (LP1501);
- Cemetery Lane, Sowerby Bridge (LP0044);
- Land at Laithe Croft Farm, Bowling Green Road, Stanland (LP0075);
- Land to the West of West View, Church Lane, Stainland (LP0146);
- Land at Brighthouse Road, Ainley Top (LP0021);
- Ainleys Industrial Estate, Ainley Bottom (LP0355);
- Long Heys, Greetland (LP0037);
- Land at Dewsbury Road, Elland (LP0025);
- Land adjoining South Parade, Elland (LP1030);
- Land off Scar Bottom Lane, Greetland (LP1407);
- Land off Lower Edge Road, Elland (LP0978);
- Land off Toothill Bank, Rastrick (LP1033);
- Land West of Huddersfield Road, Brighthouse (LP1618);
- Land between Bradley Wood and Woodhouse Lane, Rastrick (LP1451);
- Land between Highmoor Lane and Bradford Road, Brighthouse (LP1463);
- Halifax Road, Hove Edge (LP1095);
- Land at Bank Top/Common Lane, Halifax (LP683);
- Springhead, Northowram (LP0221);
- Land North and North West of Wade House Road, Shelf (LP1543);
- Land off Cock Hill Lane, Shelf (LP0782);
- Land at West End Golf Club, Paddock Lane, Halifax (LP0968);
- Land off Denfield Lane, Wheatley, Halifax (LP0990);
- Land off Whitehill Road, Keighley Road, Illingworth, Halifax (LP0531);
- Goosegate Farm, Heathy Lane, Holmfield, Halifax (LP0046);
- Land adjacent to Whitehouse Farm, Riley Lane, Holmfield, Halifax (LP1019);
- Near Royd, Ovenden, Halifax (LP1229);
- Land adjacent Boothtown Road, Boothtown, Halifax (LP1215);
- Land at Titan Works, Claremount Road, Boothtown, Halifax (LP1609);
- Land to rear of 115 Claremount Road, Halifax (LP1603);
- Horley Green Works, Horley Green Road, Claremount, Halifax (LP1137);
- Land at Listers Road, Shibden, Halifax (LP0105);
- Land off Park Lane, Siddal, Halifax (LP1128) & (LP1196); and
- Star Garage, Wakefield Road, Copley (LP1203).



## 5 Village Envelopes

- 5.1 A significant aspect of the character of Calderdale's settlement pattern is the network of villages which has evolved to form an important part of the cultural landscape. Development has typically been piecemeal and incremental with their essential character of small, nucleated settlements largely being maintained. Whilst Green Belt designation effectively preserves this pattern of built form, it could constrain the ability to allow for development to support communities in these areas.
- 5.2 Paragraph 86 of the NPPF deals with the investigation of land in the vicinity of villages currently washed over by the Green Belt. Paragraph 86 reads as follows: 'If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation areas or normal development management policies, and the village should be excluded from the Green Belt'.
- 5.3 It is important to consider where Green Belt designation might be amended to reflect changing circumstances without causing damage to the Green Belt. Options for dealing with villages currently washed over by the Green Belt are to:
- Remove selected villages from the Green Belt through in-setting; or
  - Maintain 'washed-over' status.
- 5.4 The Green Belt Review assessed all of the village envelopes within Calderdale and found that they were all medium sensitive when assessed against the 5 Green Belt purposes. Using that evidence, the following village envelopes have been removed from the Green Belt through in-setting as they are considered to contain an extensive amount of existing development which compromises the openness and/or urbanises the countryside. These village envelopes also made a relatively low contribution to checking sprawl, safeguarding the countryside from encroachment and preventing neighbouring towns from merging. The settlements were also located adjacent to or within the area of search employed by the Green Belt Review and were considered to be located in a sustainable location in accordance with sustainable development as outlined in the NPPF. Inset villages are where it is proposed that no Green Belt policy apply.
- Bradshaw - Central (431-00);
  - Bradshaw - North East (432-00);
  - Bradshaw - South (433-00);
  - Brearley (434-00);

- Elland Lower Edge (435-00);
- Elland Upper Edge - West (436-00);
- Elland Upper Edge - East (437-00);
- Jagger Green (439-00);
- Lumbrook (440-00);
- Midgley (441-00);
- Mill Bank (442-00);
- Norwood Green (444-00);
- Old Town - North (445-00);
- Old Town - South (446-00);
- Ripponden Old Lane (448-00);
- Soyland Town (450-00);
- Triangle (451-00);
- Wainstalls - Northwest (452-00); and
- Wainstalls - Southeast (453-00).

5.5 The remaining village envelopes listed below, whilst also making a relatively low contribution to the five Green Belt purposes, were in the main located outside the area of search employed by the Green Belt Review and were considered to be located in an unsustainable location. The majority of these settlements were also small with very limited service provision and are unlikely to be suitable for further development. These settlements have been washed over and are therefore proposed to be subject to restrictions of Green Belt policy.

- Blackshaw Head (427-00);
- Charlestown - Northeast (429-00);
- Charlestown - Southwest (428-00);
- Greetland, Wall Nook (438-00);
- Harvelin Park (426-00);
- Mount Tabor (443-00);
- Pecket Well (447-00);
- Slack (430-00); and
- Sowood (449-00).

## **6 Overall conclusion on exceptional circumstances**

- 6.1 This document considers the process that the Council has followed in relation to the potential need to release land from the Green Belt. It can be seen that a methodical approach has been built into each stage of the process and that ultimately this process has dovetailed with the Government's emerging policy on exceptional circumstances.
- 6.2 The proposed changes to the Calderdale Green Belt are clearly a last resort and have been minimised. Furthermore, the boundary changes are essential to achieving a sustainable future for Calderdale – one that reconciles economic, social and environmental sustainability.
- 6.3 Having regard to the above, it is considered that the exceptional circumstances have been demonstrated to justify the proposed changes to the Calderdale Green Belt boundary.

**APPENDIX 1 - Table of Housing Objectively Assessed Needs (OANs) and Local Plan Requirements using different approaches**

	A) Initial Draft Local Plan (2017 consultation) – includes “undersupply”	B) Proposed Standard National Method – no “undersupply”	C) Proposed Standard National Method including uplift to make up “undersupply” for 2016-2018	D) Proposed Standard National Method incorporating uplift for “undersupply” and indicative employment growth	E) Proposed Standard National Method incorporating uplift for “undersupply” and indicative employment growth and additional flexibility recognising the need to boost supply
<b>Objectively Assessed Need</b>	<b>1,125</b> (946 per year Base Figure; PLUS 179 per make to make up undersupply of 2,681 from 2012 to 2017)	<b>840</b> (no undersupply allowance for years since 2016 Base Date)	<b>902</b> (840 PLUS 62 per year to make up undersupply of 936 from 2016 to 2018)	<b>976</b> (840 PLUS 62 per year to make up “undersupply” PLUS 74 per year for indicative economic growth)	<b>1,018</b> (840 PLUS 62 per year to make up “undersupply” PLUS 74 per year for indicative economic growth PLUS a small margin 42 per year (5%) for flexibility)
<b>Total Requirement over the Plan period</b>	16,875	12,600	13,530	14,640	15,270
<b>Requirement for allocations (i.e. excluding extant planning permissions and windfalls)</b>	13,286	9,015	9,945	11,055	11,685
<b>Potentially available pool of site allocations</b>	15,562	15,562	15,562	15,562	15,562
<b>Reduction in the number of allocations compared to Initial Draft Local Plan 2017</b>	-2,276	-6,547	-5,617	-4,507	- 4,312
<p><b>NOTES :</b> In all cases the Plan Period is assumed to be 15 years. The requirement to make up “undersupply” is established in Planning Practice Guidance and depends upon the base date of the data. For the Initial Draft the base date was 2012, so 5 years “undersupply” was assumed for the consultation release in 2017. For the Standard Methodology the base date is 2016 so 2 years “under supply” is likely to be required. (The Standard Methodology will be updated in summer 2018 and the need for “undersupply” will vanish for 1 year, but the base numbers will change). The indicative figure for economic growth is being re-assessed and will change. The need for flexibility is to ensure deliverable sites in the firsts five years of the plan to ensure that there is a boost to housing delivery to meet needs.</p> <p>ALL Options have implications for the Green Belt and will require exceptional circumstances to be demonstrated as part of the Publication version of the Plan.</p>					



**CALDERDALE METROPOLITAN BOROUGH COUNCIL  
LOCAL PLAN WORKING PARTY**

**WARDS AFFECTED: ALL**

**Date of Meeting: 17<sup>th</sup> August 2016**

**SUBJECT OF REPORT: CALDERDALE LOCAL PLAN: Distribution of Growth**

**Report of the Planning Service Lead**

**1. PURPOSE OF REPORT**

- 1.1 To provide Members of the Working Party with the latest thoughts on the distribution of growth, which is being informed by work on the transport evidence, Habitats Regulations Assessment and ongoing site assessment.

**2. RECOMMENDATION**

- 2.1 That Members discuss the distribution of development and consider its reasonableness as a basis for the ongoing preparation of the Local Plan.

**3. BACKGROUND**

- 3.1 The National Planning Policy Framework (NPPF - 2012) requires that : *“Local Plans should meet the objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:*

- *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
- *Specific policies in this Framework indicate development should be restricted.”*  
(NPPF: Para 14).

- 3.2 Officers are working on the basis that the Calderdale Local Plan is meeting the Objectively Assessed Needs (OANs) for housing and employment growth within Calderdale’s administrative. This means that Calderdale will accommodate all its development needs and is not exporting any of the requirements to neighbouring authorities. All West Yorkshire authorities are all proceeding on this basis, whilst in Greater Manchester a joint Development Plan Document for the Manchester City Region area, is exploring the potential to seek agreement from neighbouring authorities to accommodate further growth over and above that for which they are they are already planning. The Leeds City Region – Housing Market Assessment (2016) confirms that Calderdale is a self-contained housing market – but nested within the larger geography centred on Leeds, and therefore reinforces the approach of accommodating OANs within Calderdale.

3.3 OANs for housing are established through the preparation of the Strategic Housing Market Assessment (SHMA), whilst those for employment are established through an Employment Land Review. Both assessments are compliant with the requirements of the national Planning Practice Guidance (nPPG).

### HOUSING REQUIREMENT

- 3.4 In 2012, the Council produced its Preferred Options for the Core Strategy (2012). This distributed growth identified by the previous SHMA (which was published in 2011) and was based on earlier information from the Office of National Statistics, and market factors pertaining at the time.
- 3.5 The Preferred Options Housing Requirement was 16,800 dwellings or 800 dwellings per year over the plan period between over a 21 year plan period between 2008/09 and 2028/29. Taking account of Planning Permissions at that time, allowances for windfall sites and an assumption that allocations would be made above a threshold of 0.4ha, there was a need for 10,502 dwellings to be allocated.
- 3.6 The latest SHMA was released in November 2015, and takes forward the data supporting the preparation of the Local Plan. The SHMA 2015 has uplifted the annual housing need to 946 dwellings per annum (dpa) between 2012 and 2032. This 946dpa is therefore a control figure for the early part of the plan period as well, and where completions have not been at a level to meet this need there is a shortfall. The nPPG, requires that the under delivery during the first part of this period has to be added to the overall dwelling need. There are two acknowledged approaches to dealing with this, the Liverpool Method and the Sedgefield Method, The Liverpool Method distributes the shortfall over the full plan period, whilst the Sedgefield Method uplifts the requirements in the first five years of the plan. The consultation on “Potential Sites and Other Aspects of the Local Plan”, released in November 2015, applied the Liverpool Method and spread the difference of 92 dwellings per annum across the plan period. As a result the Housing Requirement that the Local Plan is seeking to meet is 17,651 (1,038 dwellings per year).

**TABLE 1 : LOCAL PLAN HOUSING REQUIREMENT 2012 to 2032**

		<b>Number</b>	<b>Comments</b>
<b>A</b>	Requirement 2012-2015 (946dpa)	2,838	SHMA 20115
<b>B</b>	Net Completions 2012-2015	1,269	
<b>C</b>	Difference 2012-2015 (A-B) (92dpa) <i>(undersupply in early years of plan period)</i>	-1,569	A-B
<b>D</b>	Requirement 2015-2032 (946dpa)	16,082	SHMA 2015 (17 year plan period)
<b>E</b>	<b>Total Requirement (C + D)</b>	<b>17,651</b>	
	Dwellings per annum	<b>1,038</b>	

## WHAT OPTIONS HAVE BEEN CONSIDERED FOR THE DISTRIBUTION OF THE GROWTH ?

3.7 Over the years a number of different but complimentary approaches have been considered for the distribution of growth . The **Issues and Options from 2008** put forward four approaches:

1. **Business as Usual** – a continuation of the same level of growth in all settlement as has occurred over the past;
2. **New Growth Point** - this would provide increased levels of growth generally across the district but with the majority being focusses in Halifax and Brighouse. This was taking advantage of a Government led funding initiative that was available at the time;
3. **Maximising the approach in the Regional Spatial Strategy** – a strong focus of development in Halifax and to a lesser extent in Brighouse;
4. **Go for where the land is** – would take advantage of known opportunities

3.7 For the **Refined Issues and Options from 2011** these were further refined to be :

1. **Focus on Eastern Calderdale;**
2. **Enhance the role of Todmorden;**
3. **Enhance the role of Elland;**
4. **Continuation of current role and function;**

3.8 The Preferred Spatial Option (2012) for Development was

***“Delivering Growth in eastern Calderdale whilst supporting the economy and places in the west :-***

*Halifax (including Sowerby Bridge), Brighouse and Elland are to be the main focus for growth and associated infrastructure. Eastern Calderdale’s proximity to the M62 would be used to encourage business growth. The settlements in western Calderdale receive limited growth with the exception of Todmorden, where development and help to reverse the town’s decline.”*

3.9 Arising from this generalised statement of the Spatial Strategy the Preferred options put forward housing and employment numbers for each of the towns based on defined Local Plan Areas

3.10 The Preferred Options 2012 looked at distributing housing, and employment growth, to a settlement hierarchy. This had 5 Tiers of settlement. The Settlement Hierarchy Approach was required to allow consideration of growth that would be facilitated by site allocations to be brought forward in the Land Allocations and Designations Plan (LADPlan), which would have been produced after the adoption of the Core Strategy.

3.11 The actual proposed growth was distributed to Local Plan Areas, and assumed that there was a housing allocation figure of 10,500 and allocation threshold of 0.4ha (1 acre). For employment land this was stated in floorspace required rather than land area.



**TABLE 2 : PREFERRED OPTIONS HOUSING AND EMPLOYMENT LAND DISTRIBUTION (2012)**

LOCAL PLAN AREA	PREFERRED OPTIONS ALLOCATION DISTRIBUTION	PREFERRED OPTIONS EMPLOYMENT DISTRIBUTION (sq.m)	
		Offices	B1 to B8
	Allocated Sites to be over 0.4ha		
BRIGHOUSE	2,100	35,000sq.m	40,000sq.m
ELLAND	1,067	8,000sq.m	50,000sq.m
HALIFAX	5,030	45,000sq.m	85,000sq.m
HEBDEN BRIDGE	252	1,000sq.m	500sq.m
MYTHOLMROYD / LUDDENDEN	158/160	100sq.m	1,000sq.m
NORTHOWRAM / SHELF	368	100sq.m	0
RYBURN VALLEY	46/50/55	200sq.m	1,000sq.m
SOWERBY BRIDGE	840	1,000sq.m	9,000sq.m
TODMORDEN	630	2,000sq.m	3,000sq.m
<b>CALDERDALE</b>	<b>10,502</b> (figures to not add up due to rounding) (NOTE Requirement was 16,800)	<b>98,500sq.m</b>	<b>198,600sq.m</b>

**OPTIONS FOR DISTRIBUTING NEW GROWTH FOR THE LOCAL PLAN 2016**

3.12 The latest SHMA (2015) has increased the housing requirements for the district. (See comparative figures in Table 5 below). A new Employment Land Study is exploring the needs for additional employment land, but this has not yet reached a conclusion. As a result this report will focus on the distribution of possible housing requirements.

3.13 The overall requirement for new housing in 17,651 new dwellings between 2012 and 2013. In order to ascertain the requirement for allocations to be identified in the Local Plan, allowances are made for dwellings that have been completed and those that are under construction or with planning permission. This figure is further discounted to reflect the fact that not all permission actually translate into built development. "Windfall" development , and completions in part of the plan period

**TABLE 3 : CALCULATION OF HOUSING ALLOCATIONS NEEDED FOR LOCAL PLAN**

	Total from Table 1	Existing permissions and U/C 31/03/2016 DISCOUNTED	WINDFALLS	Completions 15-16	NEED FOR ALLOCATIONS
<b>CALDERDALE</b>	<b>17,651</b>	<b>2,234</b>	<b>1,247</b>	<b>336</b>	<b>13,834</b>

NOTE : requirements for employment and new retail growth have not been determined at the time of writing.

3.14 It is possible to see how the allowances and effect of Permissions and dwellings under Construction feed through to the need for Allocations in the Table below.

**TABLE 4 : Allowances for Permissions, Completions, Windfalls**

Local Plan Area		Existing permissions and U/C 31/03/2016 DISCOUNTED	WINDFALLS	Completions 15-16	Area Allowances	TOTAL FOR ALLOCATION 2016/17
BRIGHOUSE	-	279	168	65	521	-
ELLAND	-	208	189	50	447	-
HALIFAX	-	849	615	112	1,576	-
HEBDEN BRIDGE	-	81	18	46	145	-
MYTHOLMROYD / LUDDENDEN	-	67	20	6	93	-
NORTHOWRAM / SHELF	-	93	19	9	121	-
RYBURN VALLEY	-	101	23	11	135	-
SOWERBY BRIDGE	-	313	27	24	364	-
TODMORDEN	-	245	168	13	426	-
CALDERDALE	<b>17,651</b>	<b>2,234</b>	<b>1,247</b>	<b>336</b>	<b>3,817</b>	<b>13,834</b>

### 3.16 What Ideas for Distribution are being considered ?

These basically follows the same focus on eastern Calderdale distribution from the Preferred Options of 2012, but have been further refined to reflect the increase housing requirement arising from the latest SHMA (2015) and the ongoing transport evidence.

3.17 Of particular significance is the potential for additional transport infrastructure and funding through the West Yorkshire+ Transport Fund which will facilitate interventions along the A641 Corridor between Huddersfield and Bradford. Investment in excess of £40million already committed leads to consideration of additional growth within the Brighouse area as an increasingly possible future, which needs to be considered as part of the Local Plan. The Transport Evidence together with that associated with the Habitats Regulations Assessment (HRA) also suggests that northern and western Halifax are less sustainable areas for significant growth.

3.18 As site assessment work is also ongoing this has also recognised that some areas have significant environmental constraints which also limit their capacity for significant growth. The final distribution of potential sites will not necessarily follow any of the notional ideas that are set out in Tables 6 and 7. The consideration of

sustainable development is not a matter that will automatically fit a notional distribution.

- 3.19 As an initial consideration of the potential distribution that may come forward within the Local Plan, a starting position that the Preferred Options distribution was appropriate has been made.

**TABLE 5 : Consideration of Growth Distribution**

Local Plan Area	PREFERRED OPTIONS (PO) 2012 : ALLOCATIONS Distribution	SHMA Total 2015 Spread using PO distribution
BRIGHOUSE	2,100	3,530
ELLAND	1,067	1,800
HALIFAX	5,030	8,471
HEBDEN BRIDGE	252	424
MYTHOLMROYD / LUDDENDEN	158/160	282
NORTHOWRAM / SHELF	368	636
RYBURN VALLEY	46/50/55	71
SOWERBY BRIDGE	840	1,412
TODMORDEN	630	1,059
CALDERDALE	<b>10,491</b> (this figure was for allocations) <b>NOTE overall Requirement was 16,800</b>	<b>17,651 Requirement from Table 1</b> (figures do not add up due to rounding)

**TABLE 6 : Notional Distribution of Housing Growth for Each Town Area**

	A	B	C	D	E	F
BRIGHOUSE	9,619	6,178	8,048	5,039	5,287	6,397
ELLAND	1,067	1,067	1,067	1,800	1,835	1,354
HALIFAX	5,030	8,471	6,601	8,471	6,601	5,026
HEBDEN BRIDGE	252	252	252	252	252	107
MYTHOLMROYD/LUDDENDEN	160	160	160	282	918	189
NORTHOWRAM/SHELF	368	368	368	636	829	515
RYBURN VALLEY	55	55	55	71	829	-64
SOWERBY BRIDGE	600	600	600	600	600	236
TODMORDEN	500	500	500	500	500	74
CALDERDALE	17,651	17,651	17,651	17,651	17,651	17,651

**TABLE 7 : Potential Need for allocations for Each Town area based on Notional Distributions Above**

	A	B	C	D	E	F
BRIGHOUSE	9,107	5,666	7,536	4,527	4,775	6,397
ELLAND	621	621	621	1,354	1,389	1,354
HALIFAX	3,455	6,896	5,026	6,896	5,026	5,026
HEBDEN BRIDGE	107	107	107	107	107	107
MYTHOLMROYD/LUDDENDEN	67	67	67	189	825	189
NORTHOWRAM/SHELF	247	247	247	515	708	515
RYBURN VALLEY	-80	-80	-80	-64	695	-64
SOWERBY BRIDGE	236	236	236	236	236	236
TODMORDEN	74	74	74	74	74	74
CALDERDALE	13,834	13,834	13,834	13,834	13,834	13,834

**NOTES FOR BOTH TABLES 6 and 7:**

**Description of the notional approaches to distributing the growth :**

- **A** : based on 2012 Preferred Options distribution. Taking into account limitations of land availability in each centre. Remaining requirement to be within Brighouse;
- **B** : based on 2012 Preferred Options distribution. Taking into account limitations of land availability in each town area. Uplifting Halifax 2015 dwelling requirements based on same % from 2012 Preferred Options. Remaining requirement to be within Brighouse;
- **C** : based on 2012 Preferred Options distribution. Taking into account limitations of land availability in each town. Uplifting Halifax inline with distribution by existing dwellings. Remaining requirement to be within Brighouse;
- **D** : Based on Preferred Options uplift;
- **E** : Based on the existing number of dwellings within each settlement;
- **F** : Based on PO uplift except Halifax which is based on size of settlement;

Each of these notional distributions have different impacts on local areas and cannot fully be appraised until the site assessment work has been completed.

3.20 It should be noted that these Notional Distributions brings forward notable anomalies. In particular the negative figure for allocations in Ryburn Valley and the very small need for allocations in the Todmorden area.

3.21 The individual site assessments will be a very important part of coming to a view on distribution. There is an expectation that where suitable “brownfield” sites area assessed these will have a higher potential for being allocated than similar greenfield sites. The “Brownfield First” principle remains a driving force on site assessment, even though the NPPF (paragraph 17) only requires council’s to *“encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value”*. As the site assessment process rolls forward and the implications for the use of brownfield and greenfield land and the Green Belt will become much clearer.

3.22 How to achieve any of the notional growth depends upon a mixture of smaller readily available smaller sites together with potentially longer time-frame Sustainable Urban Extensions (SUEs). Considerations of SUEs as a way forward of

providing for a sustainable future was first raised in the consultation in autumn 2015. A number of towns were identified as having the scope contribute to increased growth and deliver sustainable development through the options to potentially accommodate a SUE. Consideration of the comments made during the autumn consultation together with further work relating to the transport evidence and Habitats Regulations Assessment has raised questions over some of the potential SUEs. As a result, the opportunities to facilitate the scale of development that is required are increasingly becoming more focussed upon parts of eastern Calderdale including Brighouse and parts of northern Halifax, as previously mentioned in paragraph 3.17. In order to further explore potentiality around Brighouse, further work is in preparation to explore the opportunities and problems associated with enhanced development potential in the Brighouse area.

## **CONCLUSION**

4.1 The Local Plan, will allocate sites to meet the Objectively Assessed Needs (OANs) for new homes and employment. This report has looked at some of the high level notions about how the housing growth could be distributed around the district. These are not options for distributing that growth, as it is important to recognise that the final choices for sites can only be made once the assessments have been finalised, but provides an indication on a broad level of how some of the distribution may come into focus later in the plan-making process.

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Date: 8 August 2016

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