

Calderdale Local Plan

**Justification for Southeast Calderdale Garden
Suburbs**

July 2018

1. Introduction

- 1.1 An important theme in consideration of the spatial distribution of housing development has been the relative merits of a larger number of more modest allocations ‘pepper-potted’ throughout the district versus a smaller number of large strategic allocations. This issue was explored at a number Local Plan Working Party meetings and at a series of public workshops in different locations around Calderdale.
- 1.2 The Garden Suburb approach to development is unprecedented in the history of Calderdale. In relation to this, the tightly drawn Green Belt boundaries, historically plentiful supply of previously developed land, and challenging topography have resulted in developments typically being smaller in scale. This has also enabled Calderdale to focus development into existing settlements and achieve a very high proportion of development on previously developed land.
- 1.3 Calderdale’s success has however resulted in its own challenges in terms of meeting our future housing requirements. In relation to these there are now relatively few deliverable and viable previously developed sites in sustainable locations that are capable of coming forward without public sector intervention (this is evidenced by our site assessments and the sequential approach that we have taken to site selection).
- 1.4 The preparation of the Local Plan has also resulted in particular concern about the need to coordinate the delivery of infrastructure effectively, and the challenges of managing the cumulative impact of smaller sites being brought forward.
- 1.5 In relation to this point, focusing development on a smaller number of strategic allocations is considered to offer a particular opportunity for sustainable development because such sites are of sufficient scale to provide a planned ‘garden village’ layout with enhanced local facilities and infrastructure. In this sense it is possible to manage and mitigate impacts in a more holistic manner.
- 1.6 Ultimately, it was concluded that Calderdale needs a balanced portfolio of sites in order to achieve an acceptable housing trajectory - smaller more straightforward sites that can deliver earlier; and larger, more transformational sites to achieve overall OANs and regeneration/infrastructure benefits.
- 1.7 The iteration of the Local Plan that Calderdale proposes to Publish includes two strategic housing allocations in Southeast Calderdale identified as the Thornhills and Woodhouse Garden Suburbs. The purpose of this document is to demonstrate the

rationale for this approach and explain why it has been concluded that these sites should progress rather than other options.

- 1.8 The merits of this approach have been explicitly recognised by paragraph 72 of the Revised National Planning Policy Framework (July 2018):

The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:

a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;

b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;

c) set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided;

d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations)³⁵; and

e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.

2. CONSIDERATION OF OPTIONS DURING REGULATION 18 STAGES

Potential Sites and Other Aspects of the Local Plan (2015) (PSOALP)

- 2.1 In the autumn of 2015 Calderdale undertook a Regulation 18 consultation on the PSOALP. For the purposes of potential housing allocations this consultation included sufficient land to provide in excess of 30,000 dwellings. At that stage in the process

the Council was deliberately casting a wide net in order to engage with stakeholders on a full range of different options.

- 2.2 The PSOALP consultation included what were at the time identified at 'Strategic Urban Extensions' (SUEs). Fourteen potential SUEs were identified, the locations of which are shown in Appendix 1 to this document. The site assessments are summarised below.

LP1451

Land between, Bradley Wood and Woodhouse Lane, Rastrick, Brighouse.

63.00 ha

PROPOSED ALLOCATION:

In 2016, the Council appointed consultants to undertake work to explore the potential of accommodating new homes in south eastern Calderdale. This involved identifying and considering constraints to development, and measures to mitigate these, including highways measures, provision of open space on site, protection of ecology, and provision of a new primary school to meet new and existing demand.

The work concluded that approximately 1223 new homes could be developed on this site. The Council's preferred use is therefore a 'Garden Suburb'.

LP1452

Land Between Dewsbury Road, Pinfold Land and New Hey Road, Rastrick

13.57ha

Site Filtered:

This is a gently undulating greenfield site within the Green Belt, close to the M62 motorway. It is adjacent to the urban area on its eastern side, and there is also a working farm adjacent on its western boundary.

The site has good access to a range of local facilities and services, although it is further than 400m to a bus stop with a service at least every 30 minutes.

It has been suggested by Highways England that development of the site does not commence until later in the Plan period, so that cumulative impacts on the highway network can be mitigated.

Where committed schemes do not mitigate the impact of the development of the site, the development scheme may have to contribute or deliver other schemes.

Highways Development Management has commented that the frontage along Dewsbury Road (B6114) could provide a new access and with widening, Pinfold Lane could also provide access (two accesses would be required for a site of this size). A Right Turn Lane junction is likely to be needed on B6114 Dewsbury Road and there appears to be sufficient frontage to achieve this.

The site does have some ecological value, the pond and hedgerows on site are UK Biodiversity Action Plan Priority Habitats. The developable area has been amended to remove the pond. Any development proposal will need to take into account the location of hedgerows and integrate into the layout and design of development, or integrated landscaping/public open space.

Given the size of the site, a Flood Risk Assessment would be required in order to assess any risk of flooding and propose mitigation measures to reduce such risks. In addition, as this is a greenfield site, its development could increase run off and reduce surface water infiltration. Consideration should be given to the integration of green infrastructure to minimise any adverse impacts.

Given the constraints set out above - the working farm, high voltage overhead powerlines, ecology

and the close proximity to the motorway (which would require an appropriate buffer), the site is filtered and will not be taken forward as a site allocation.

LP1453

Land off Lillands Lane, Brighouse

8.31ha

Site Filtered:

This is a gently sloping greenfield site within the Green Belt, adjacent to the urban area. It is close to the railway line and Strangstry Local Wildlife Site to the north, with other greenfield sites to the east and south. The site has good access to a range of services and facilities, and is within 2km of a railway station.

The site is within Flood Zone 1, however, given the size and the greenfield status of the site, a Flood Risk Assessment would be required in order to assess any risk of flooding and propose mitigation measures to reduce such risks. The Flooding and Drainage Section of the Council considers the site developable subject to evaluation of existing drainage network and mitigation being secured. The Flooding and Drainage Section recommends green and blue infrastructure including SuDS and green roofs to reduce the infiltration rate of precipitation as well as provide storage for storm water run-off.

Development of the site should not commence until later in the Plan period due to cumulative impacts of development across the district on the strategic highway network. Highways England has suggested that development of this site not be commenced until completion of the Road Investment Strategy schemes programmed to start in the current roads period (2015/16 – 2019/20). Schemes include M62 J20-J25 Smart Motorway.

Highways Development Management have advised that the site is landlocked in isolation and depends on sites LP1472 & LP0893 being developed to provide access of a reasonable standard. Some access could be provided along Lillands lane but this would need upgrading and surfacing to adoptable standards with footways providing.

An overall Masterplan for site is required including potential traffic distribution through Brighouse and potential impact upon A641, A644 and SRN including M62 J25.

The site is in close proximity to Strangstry Wood Local Wildlife Site, and therefore West Yorkshire Ecology recommends a buffer of 20m to be removed from the developable area which has been applied to ensure that any development minimises impact on this ecological asset. The Council's Conservation Section (Ecology) recommends a further 10m buffer from the Wildlife Habitat Network to the South West and North East boundary of the site. The Ecology section indicates that there is likely to be adverse impact due to increased recreation on nearby LWSs.

However, it is likely that adverse ecological impacts can be mitigated through planting all buffers with locally native species rich neutral grassland and allow to naturally regenerate to woodland and providing mitigation for the increased recreational pressure on nearby LWSs. A SuDS scheme should take account of existing biodiversity and take the form of fen, marsh, wet grassland and standing water in basins.

The site is designated open space and the original boundary of the site included playing fields used by Rastrick High School. At the time of the 'Local Plan – Initial Draft' consultation the Calderdale Playing Pitch Strategy and Action

Plan 2017 found that there is some spare capacity at this site but that some facilities at the school are of poor quality. The Playing Pitches leased to Rastrick High School have been taken out of the potential allocation and developable area boundary to safeguard their continued use.

There are no impacts on heritage or archaeological assets.

The site falls within the Mineral Safeguarding Area for coal and stone, therefore, non mineral

development will be expected to investigate the potential for extraction of the mineral resource prior to development taking place. This is a requirement of Local Plan policy.

Environmental Health has commented that a stand off between the schools and housing would be required. They also state that some land contamination exists on site; therefore, Any development should be accompanied by an appropriate contaminated land assessment, with any mitigation measures identified. There could be a possible negative impact on Brighouse AQMA. Regard should be given to the West Yorkshire Low Emission Strategy which has been adopted by the Council. This gives guidance on good practice for mitigating air quality impacts.

The Green Belt parcel the site is located in performed well in the Green Belt Review satisfying 3-5 Green Belt purposes. However, when the site specific review was carried out the site scored poorly satisfying only 0-2 Green Belt purposes.

However, given the constraints, specifically site access and ecology, and having regard to the Council's housing need, the Local Plan's spatial strategy, the supply of more suitable and available sites elsewhere and the need to protect the Green Belt as far as possible, this site has been filtered.

LP1454

Land to the West of Elland Bridge, Elland
6.62ha

Site Filtered:

This is a relatively flat greenfield site, within the Green Belt close to Elland Bridge. It is located on an island surrounded by water courses. Existing access through employment uses would be unsuitable for a residential use.

Removal of the site from the Local Plan process has been recommended on both flooding and ecology grounds.

It is therefore filtered and will not be taken forward as a site allocation.

LP1455

Land at, Exley Lane, Halifax.
60.09 ha

Site filtered:

The development of this site would result in the merging of Elland and Halifax. Smaller areas of land making up this large site have been considered separately. This site is filtered and will not be taken forward as a potential site allocation.

LP1456

Land Between Rochdale Road and Dean Lane, Sowerby Bridge
21.19ha

Site Filtered:

This site was considered for allocation as a Sustainable Urban Extension in the 'Potential Sites and Other Aspects of the Local Plan' consultation in 2015, along with 13 other areas identified as potential urban extensions.

The balance of evidence indicates that Brighouse and Rastrick will be the key focal points for new residential development. This is due to the availability of land and their relative sustainability, with fewer potential impacts on the important environmental designations in the west of the District.

Brighouse and Rastrick are close to the M62 and the border with Bradford and Kirklees. Brighouse as

a town is also likely to benefit from capacity improvements to the A641, A644 and potentially also a new M62 junction 24a which could all be delivered through the West Yorkshire + Transport Fund.

LP1457

Land Between Burnley Road, Newland Road and Water Hill Lane, Warley, Halifax

58.72ha

Site Filtered:

This site was considered for allocation as a Sustainable Urban Extension in the 'Potential Sites and Other Aspects of the Local Plan' consultation in 2015, along with 13 other areas identified as potential urban extensions. The balance of evidence indicates that Brighouse and Rastrick will be the key focal points for new residential development. This is due to the availability of land and their relative sustainability, with fewer potential impacts on the important environmental designations in the west of the District. Brighouse and Rastrick are close to the M62 and the border with Bradford and Kirklees. Brighouse as a town is also likely to benefit from capacity improvements to the A641, A644 and potentially also a new M62 junction 24a which could all be delivered through the West Yorkshire + Transport Fund. In addition, it is considered that development in this part of the Borough would lead to significant adverse impacts on Warley Conservation Area and other listed assets.

LP1458

Land at Highroad Well Moor, Off Heath Hill Road, Highroad Well, Halifax.

95.41 ha

Site filtered:

Large area of predominantly greenfield land currently situated within the designated green belt. The majority of the urban extension contains parcels which perform poorly when assessed against the five green belt purposes. Part of the land to the north west is however outside the green belt area of search, due to its remote location.

A large part of this area of relatively unimproved acid grassland/heath is included within the Wildlife Habitat Network. This includes parts of the golf course, which have additional scrub and woodland habitats. West Yorkshire Ecology has therefore removed these areas from the proposed allocation. The extension also contains a large area of open space including amenity green space and outdoor sports facilities which have been retained in the Open Space Study. The remainder of the land is West End Golf Course, an open and well used facility which, apart from LP0968 in the south east corner of the extension, has not been proposed as a site to consider.

For the above reasons it is considered that this urban extension should be removed from the process.

LP1459

Land between Moor End Road, Hebble Vale Drive and Larch Close, Wheatley, Halifax

47.47ha

Site Filtered:

This site was considered for allocation as a Sustainable Urban Extension in the 'Potential Sites and Other Aspects of the Local Plan' consultation in 2015, along with 13 other areas identified as potential urban extensions.

The balance of evidence indicates that Brighouse and Rastrick will be the key focal points for new residential development. This is due to the availability of land and their relative sustainability, with fewer potential impacts on the important environmental designations in the west of the District. Brighouse and Rastrick are close to the M62 and the border with Bradford and Kirklees. Brighouse as a town is also likely to benefit from capacity improvements to the A641, A644 and potentially also a new M62 junction 24a which could all be delivered through the West Yorkshire + Transport Fund.

LP1460

Land between Shay Lane, Queensbury Road and Churn Milk Lane, Holmfild, Halifax

11.21ha

Site Filtered:

This is a predominantly greenfield site located to the east of the Ovenden and within the Green Belt. The Green Belt parcel the site lies within fulfils 3-5 Green Belt purposes. Access to services is good, although the site lies further than 400m to a bus stop with a high frequency service, and further than 600m to a public open space.

The majority of the site lies within Flood Zone 1 but is at risk from surface water flooding, therefore a Flood Risk Assessment is required. There have been a couple of land drainage issues in the past in the close vicinity of the site, but development is considered suitable after a Flood Risk Assessment has been undertaken and investigations of the existing drainage network.

Development of the site is not considered to have an adverse impact on the strategic road network, however, Development Management Section have commented that site access is unachievable due to the topography of the site. They would require the landowner to demonstrate an access through a topographical survey and feasible layout drawing of access/junction.

The site falls within the Wildlife Habitat Network, and West Yorkshire Ecology have commented that the site provides good opportunities for connecting more species rich grassland to the north and south. They have recommended the retention of this link, with the western side probably less critical than that to the east, and therefore suggested that some land is removed from the developable area.

Development of the site is unlikely to have adverse impacts on heritage assets, however, there is an archaeological asset within the site. West Yorkshire Archaeological Advisory Service have therefore recommended that a predetermination archaeological evaluation is undertaken.

The site lies within the Mineral Safeguarding Area for both stone and coal. Non mineral development will be expected to investigate the potential for extraction of the mineral resource prior to development taking place. This is a requirement of Local Plan policy.

Although a number of constraints can be overcome through mitigation, the topography of the site means site access is not achievable. Highways Development Management have recommended that the site is filtered. It will therefore not be taken forward as a site allocation.

LP1461

Land north of, Field Head Lane, Green Lane and Riley Lane, Illingworth, Halifax.

82.86 ha

Site filtered:

The Council's Ecology Officer raises concerns that the site lies close to the SPA/SAC and a development of this size is likely to result in a significant increased disturbance due to recreation on

the designated features of the SPA/SAC.

This site includes a number of Grade II Listed Buildings including Scausby Hall, North Scausby Farmhouse and its adjacent barn and there is, in addition, a large group of Listed Buildings to the south of this area including Holdsworth House which is a Grade II* Listed Building. The rural historic setting of these listed buildings is especially important.

Environmental Health raise concerns about noise from the several wind turbines in the area.

For this area to have progressed as an urban extension masterplanning would be required in order to address, amongst other matters, the issues above and the overall design and scale of development. It has therefore been determined that while the individual sites might come forward, this urban extension is less suitable than those that have been explored in the south east of the borough.

Therefore the site will not be put forward as a preferred urban extension.

LP1462

Land between, Stanage Lane and Cooper Lane, Shelf, Halifax

36.29 ha

Site filtered:

There are several wind turbines which may cause noise nuisance.

Non mains drainage and land contamination may be an issue on parts of the site and any working farm maybe affected.

Rights of Way cross the site and it is in a bat alert area.

Highways England point out that there is a risk that a capacity problem to M606 may emerge later in the Plan period; and if this proves to be the case, this site may need to fund or contribute to any necessary mitigation scheme.

Highways Development Management state that a significant masterplan with a site access strategy would be needed before progressing with any applications.

Concern has been expressed about the quantum of potential development in Shelf relative the size of the existing community, and the resultant impact on the character and identity of the village.

Therefore the site will not be put forward as a preferred urban extension.

LP1463

Land between, Highmoor Lane and Bradford Road, Brighouse.

140.66 ha

PROPOSED ALLOCATION:

In 2016, the Council appointed consultants to undertake work to explore the potential of accommodating new homes in south eastern Calderdale. This involved identifying and considering constraints to development, and measures to mitigate these, including highways measures, provision of open space on site, provision of green routes, protection of ecology, and provision of a new primary school and secondary school to meet new and existing demand.

The work concluded that approximately 1926 new homes could be developed on this site. The Council's preferred use is therefore a 'Garden Suburb'.

LP1464**Land off Stoney Royd Lane, Todmorden****1.62ha****Site Filtered:**

This is a greenfield site within Todmorden and is designated as Open Space and Wildlife corridors in the RCUDP.

This site was considered for allocation as a Sustainable Urban Extension in the 'Potential Sites and Other Aspects of the Local Plan' consultation in 2015, along with 13 other areas identified as potential urban extensions. The balance of evidence indicates that Brighouse and Rastrick will be the key focal points for new residential development. This is due to the availability of land and their relative sustainability, with fewer potential impacts on the important environmental designations in the west of the District. Brighouse and Rastrick are close to the M62 and the border with Bradford and Kirklees. Brighouse as a town is also likely to benefit from capacity improvements to the A641, A644 and potentially also a new M62 junction 24a which could all be delivered through the West Yorkshire Transport Fund. Notwithstanding this, sites located within proposed urban extensions will be assessed on their individual merits.

West Yorkshire Ecology recommends that a proportion of the site be removed from the developable area since this site is close to the SAC/SPA and lies within the wildlife habitat network for grassland. Over 23% of the site falls within Flood Zone 3b, 12% within 3a and 13% in Flood Zone 2. The site also has 13% within a 1 in 30 year surface water flooding area. JBA has recommended that the site be withdrawn due to the overall flood risk.

Given the fluvial and pluvial floodrisk, it is recommended that the site is filtered and is not taken forward in the Local Plan. As a result, the site will not be allocated as a Sustainable Urban Extension.

Strategic Vision for Southeast Calderdale (2016)

- 2.3 The balance of evidence indicates that Brighouse and Rastrick will be the key focal points for new residential development. This is due to the availability of land and their relative sustainability, with fewer potential impacts on the important environmental designations in the west of the District. Brighouse and Rastrick are close to the M62 and the border with Bradford and Kirklees. Kirklees also has aspirations for significant residential and employment development immediately to the south of Calderdale's administrative boundary (at Bradley Hall and Cooper Bridge respectively). Brighouse as a town is also likely to benefit from capacity improvements to the A641, A644 and potentially also a new M62 junction 24a which could all be delivered through the West Yorkshire + Transport Fund.
- 2.4 LP1463 known as 'Thornhills Garden Suburb' and LP1451 known as 'Woodhouse Garden Suburb' were identified as the preferred options because they performed acceptably through the site assessment process and had the best relationship to the transport infrastructure improvements and employment development proposed at the Clifton Enterprise Zone. As indicated above consultants were commissioned to prepare the Strategic Vision for Southeast Calderdale (SVSEC).

- 2.5 The SVSEC set out a proposition for what could be achieved quantitatively and qualitatively on the Garden Suburbs. It also explored in more detail how the Garden Suburbs could relate to other emerging projects such as the A641 corridor improvements and the Clifton Enterprise Zone. The SVSEC also looked at how the requirement for school places could be met, and to this end space is identified that could accommodate secondary and primary schools in Thornhills Garden Suburb and a primary school in Woodhouse Garden Suburb.
- 2.6 Overall, the SVSEC exercise has provided the Council with reassurance that the Southeast Calderdale Garden Suburb approach is a deliverable and sustainable way to proceed.

3. Initial Draft of Calderdale Local Plan

- 3.1 The two Southeast Calderdale Garden Suburbs were included in the Initial Draft of the Local Plan, which was subject to public consultation between August and October 2017. Whilst there was debate about the merits of the proposals during and after this consultation, strong evidence was not brought forward to suggest that the approach was ill-founded.

4. Cross-boundary planning

- 4.1 According to the Government:

Effective working across local authority boundaries is essential to plan for the delivery of housing, infrastructure and other strategic needs of communities; particularly where there is high housing pressure and areas are heavily constrained. Joint working is a statutory requirement under the duty to cooperate, introduced through the Localism Act in 2011, and the Government has recently consulted on the introduction of a statement of common ground to further encourage more and better joint working. Support under this section of the prospectus is offered to create additional capacity in local authorities for joint working to help achieve their ambitions for growth. (Planning Delivery Fund – Supporting joint working, high quality design and innovation, DCLG, December 2017)

- 4.2 Junction 25 of the M62 that serves Brighouse is of strategic importance to both Calderdale and Kirklees Councils. In addition to the development identified in Calderdale, Kirklees Council is progressing a number of strategic housing and employment allocations on the South side of the M62. The two Councils believe that their respective aspirations for growth are complementary, and that the ultimate goal should be a Leeds City Region Spatial Priority Area centred on junction 25. To this end the Councils have been working together closely.

4.3 In March 2018 it was confirmed by the Ministry of Housing Communities and Local Government that a joint bid by Calderdale and Kirklees Councils to the Planning Delivery Fund for increased capacity to support joint planning had been successful. This will provide £170,000 to enable the councils to work together to develop further plans for infrastructure delivery across the South East Calderdale/North Huddersfield area.

4.4 The Southeast Calderdale Garden Suburbs should therefore be seen as part of an ambitious initiative by two Councils to deliver transformational growth and regeneration. Furthermore it can be seen that this approach is aligned with the Government's direction of travel on joint working.

5. Infrastructure, Master Planning and Delivery

5.1 The Council's Infrastructure Delivery Plan (2018) includes an Appendix (5) that amplifies the infrastructure requirements for Southeast Calderdale. Furthermore separate papers have been/are being prepared relating to Health and Wellbeing, and Education infrastructure. The second two papers relate to the whole of Calderdale.

5.2 Policy IM7 of the Calderdale Local Plan Publication Draft (2018) sets out the requirements for the master planning of Strategic Sites (i.e. the two Garden Suburbs). The expectations of the policy are set out below:

- an indicative development layout and phasing and implementation plan;
- high standards of design that respect the character of the landscape, heritage, adjacent and nearby settlements and built development, reflecting the urban to rural transition with appropriate boundary treatment;
- make effective use of the site through the application of appropriate densities in terms of scale, height and massing, and its relationship to adjoining buildings and landscape;
- create a strong sense of place, ensuring the proposed development makes a positive contribution to local character and distinctiveness;
- plan for integrated development, providing for a mix of housing that addresses the range of local housing needs, and encourages community cohesion;
- reduce the need for car use and encourage sustainable modes of travel, including provision for public transport, cycle routes, footpaths and bridleways, including the roll-out of 20mph zones across the
- Borough;

- a network of permeable and interconnected streets and public spaces which also contributes to the security of the site through appropriate design;
- measures to mitigate the traffic impacts of the proposed development on the strategic and local road networks;
- An assessment of the impact of the development on existing and planned infrastructure, and identification of new infrastructure requirements resulting from the development;
- Measures to ensure timely delivery of new and improved infrastructure
- appropriate employment provision and community facilities to serve the new development (including local shops, community halls, schools and health facilities);
- accessible open space to meet identified local needs and/or increase accessibility to existing open spaces;
- a green infrastructure strategy, providing an integrated network of green spaces and space for water and associated habitat and biodiversity;
- facilitate opportunities for local/community led food production either through the provision of dedicated spaces such as allotments, growing space within dwelling curtilages or food based communal landscaping;
- appropriate measures to mitigate flood risk and ensure that the development is resilient to the potential impacts of climate change;
- assessment of the potential for energy efficient design including renewable energy schemes;
- demonstration of a good understanding and respect for the natural environment, its heritage assets and their setting both within the site and in the wider locality, whether designated or not, and include details of how the natural environment and heritage assets will be conserved and enhanced;
- a management plan should be produced as part of the master-planning process to demonstrate how infrastructure and community assets will be maintained and managed following completion of development;
- the Council will expect master-plans to demonstrate how the design will achieve enhanced public access to high quality open space.

6. Compliance with Revised National Planning Policy Framework (July 2018)

- 6.1 Paragraph 72 of the Revised National Planning Policy Framework sets out five criteria for consideration of larger scale developments (i.e. such as the proposed Garden Suburbs). Each criterion is considered below in order to provide a basic check list against national policy:

i. Opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;

Southeast Calderdale is subject to transport investment through the West Yorkshire Plus Transport Fund. The Transport Fund will deliver the following benefits:

- Deliver significant journey time reliability benefits;
- Improve accessibility to key growth areas for housing and employment and facilitating economic development in the three districts (Calderdale, Kirklees and Bradford);
- Reduce congestion and improve journey time reliability on the A641/A644 for all modes to facilitate economic development;
- Increase the availability and use of sustainable transport modes (bus, cycle, walk);
- Improve public transport facilities and priorities;
- Safeguard and enhance the natural and built environment; and
- Delivered in cooperation with the adjacent investment projects managed by both Kirklees Council and Bradford Council.

In terms of progress, the Council are currently in the pre-feasibility prioritisation (scoping) stage of the project to identify the range, type and location of interventions required along the corridor in order to achieve the potential benefits.

ii. Their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;

The Garden Suburbs are well related to the thriving town centre of Brighouse; however, they will also provide the critical mass and scale to enable comprehensive master planning of community infrastructure. Brighouse and the wider Southeast Calderdale area is a key strategic location for employment. Most significantly in the context of the Local Plan, the Clifton Enterprise Zone is in very close proximity to the Thornhills site.

iii. Set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided;

The Garden Suburbs will be master planned along the lines established through the Garden City principles. This is evident through the Council's Strategic Vision for Southeast Calderdale and the requirements of Policy IM7.

- iv. *make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations);***

The Council has worked closely with the site promoters and used empirical evidence to inform the trajectory for delivery of development.

- v. *consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.***

The Council has completed a Green Belt review in connection with the preparation of the Local Plan. On adoption a new Green Belt boundary will be established around the Garden Suburbs.

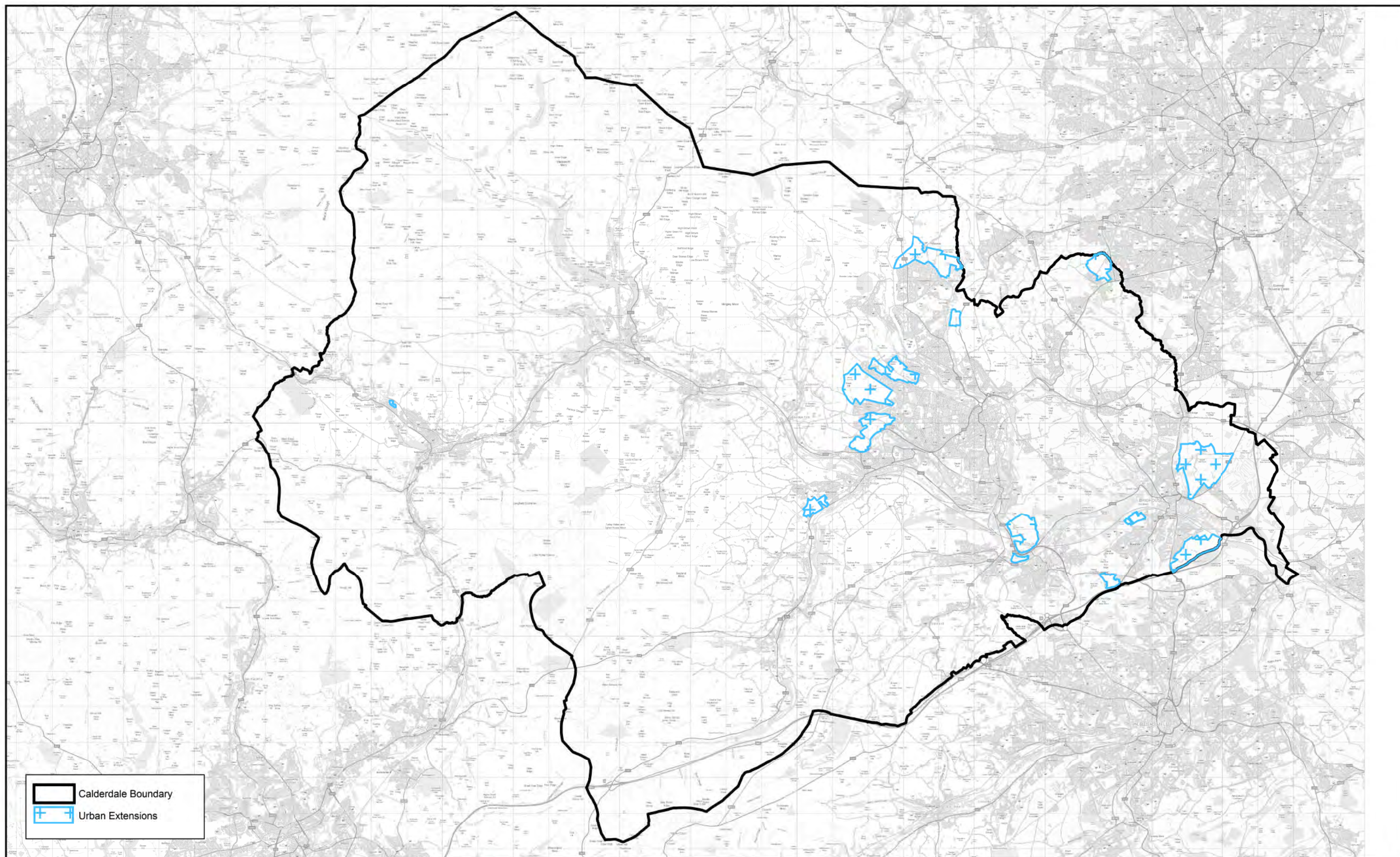
- 6.2 It can be seen from comments above that the proposed Garden Suburbs are entirely consistent in principle with the Revised NPPF.



7. Economic Viability, Affordable Housing and CIL

- 7.1 The economic appraisal supporting the Local Plan establishes that the Garden Suburbs are economically viable propositions. Furthermore, discussions with parties promoting the sites indicate that there is an intention to meet the full affordable housing requirement of 25% (the commercial attraction of affordable housing is that enables a developer to sell a block of units to a single buyer).
- 7.2 The issue of CIL needs to be considered in the context of all infrastructure that is required to support the development, and the various mechanisms for providing that infrastructure. Through the IDP and related work the Council has a clear appreciation of infrastructure requirements and programs for its delivery are at various stages of development. In terms of funding, contributions will be made by the developers, funds such as the West Yorkshire plus Transport Fund, and the capital programs of statutory undertakers.
- 7.3 Funding from developers can be channelled through the CIL, Section 106 agreements, or indirectly through the requirements of planning conditions. Ultimately it is premature and unnecessary to come to a final conclusion on precisely which route or combination thereof is most appropriate; however, it is sufficient to say that developers will be expected to contribute to infrastructure at a rate that is at least equivalent to the full requirement of CIL. For this reason it is not proposed at this stage to set a different CIL rate for the Garden Suburbs.

8 Conclusion

- 8.1 This document outlines the rationale for the Garden Suburb approach and explains why the two sites in Southeast Calderdale have been identified as the favoured options. Not only are these sites capable of being delivered in a manner that is acceptable from a planning policy perspective, but in addition they present unique opportunities for transformational growth and regeneration. Furthermore it can be seen that the approach the Council has taken is consistent with National Planning Policy.



	Calderdale Boundary
	Urban Extensions