

Calderdale Council's **disastrous** **unsustainable** Local plan

Briefing for councillors from Calderdale Friends of the Earth

February 2023

Summary of conclusions

The Council Local plan process, as approved by the Inspector, proposes that between 2018-33¹ Calderdale's population should increase by 19,320², that 10,318 new jobs be created³, and 14,950 new houses are provided⁴. In this summary these population, employment and housing numbers are referred to as 'targets'.

- The targets for population, employment and housing growth have been inflated by the Council's use of an inverted modelling sequence, which was not openly disclosed, and confused the relationship between input assumptions and outputs.
- The population and employment targets, and the intention to set them, were not included in the consultation version of the Local plan (August 2018), and therefore not disclosed to consultees. This is contrary to the requirements of NPPF para.155 that local plans should reflect 'a set of agreed priorities' on which 'a wide section of the community should be proactively engaged'.
- All three targets are unsoundly based: that for population ignores the reality that Calderdale's population has effectively stopped growing, whilst the working age population (and employment) is falling; that for employment is not supported by current Calderdale Council and WYCA policies, as claimed; that for housing requires a housing construction trajectory that cannot be achieved.
- Nonetheless the targets, inflated as a result of all these failings, have then been used to justify the existence of 'exceptional circumstances' to remove some 50 sites totalling 490 hectares from the Green Belt - the equivalent of 685 football pitches.
- In December 2022 the government announced its intention to abandon compulsory housing targets for local plans (which will henceforth be 'advisory' only), and that Green Belt boundaries should not be changed if that is the only way of achieving a council's housing target. This nullifies precisely how Calderdale Council prepared its Plan and is justifying the proposed Green Belt loss.
- Most of the Green Belt sites are not in sustainable urban locations and are inadequately served by public transport, so will be principally accessed by cars. The Plan is based on 'increasing road capacity' and 'next to motorway' principles. This will increase traffic on already congested local road networks and carbon emissions.
- Throughout the local plan preparation and examination process the Council refused to disclose what would be the changes to levels of road traffic across the local plan period, and as a result of its proposals including to increased road capacity. The inspector, having accepted that the Council should respond to this valid request, then failed to enforce it.
- The Council has not measured or modelled the carbon impacts of its Local plan proposals (despite being requested in 2015 by FOE to do so) so cannot know whether it is contributing to tackling climate change or alternatively worsening it. The council's two principal strategies - spatial and climate - are therefore disconnected from, rather than reinforcing, each other.
- The requirement of NPPF *paras.6-10* is that local plans must contribute positively to sustainable development (SD). It's unlikely however that any of the three targets, and their claimed economic benefits, will be achieved. The Plan doesn't actually tackle Calderdale's real housing problems: lack of affordability, and a failure to prioritise sustainable locations. However the environmental damage caused by the immediate loss of Green Belt sites' protected status will be permanent, whilst the NPPF stipulation that plans should 'shape places in ways that contribute to radical reductions in GHG emissions' has in practice been ignored. The inspector's attempted 'balancing' of the 3 'pillars' of SD is inadequate.
- Seeing that across the critical decade of the 2020s the district's real problems - particularly for climate, but also for housing - are not being resolved by the Local plan, but instead are being exacerbated by it, then it is reasonable to describe this as a **disaster for Calderdale**.

¹ Note that at the date of the Local plan's proposed adoption (March 2023), one third of the plan period will have already elapsed.

² [CC63b](#) table 1

³ [CC21](#) table 4.1

⁴ [CC39](#) table 1 and Inspector's report para.78

Foreword

'**Unsustainable**' is a word which is reasonably well understood. Contributing to the achievement of sustainable development (SD) is the principal requirement of the national planning policy framework (NPPF) which governs the entirety of the draft local plan. Whilst NPPF says that 'economic, social and environmental gains should be sought jointly and simultaneously through the planning system', Calderdale Council - as is typically the case - prepared a local plan focused on claimed economic gains but which failed to provide balancing social or environmental ones. Taking housing as a principle test: certainly there would be a large expansion of market housing, but little social benefit in terms of more affordable social housing, or an environmental benefit that would be created if new development were to be located primarily in sustainable urban locations rather than in the Green Belt. As this briefing will argue, the inspector has also not secured a proper balance between sustainable development's '3 pillars' - as required by NPPF - but instead has presided over an exercise primarily focused on allocating previously protected sites to developers.

But '**Disastrous**' is a strong word; can it be justified? Climate change is a huge threat, to the UK and the world, and as we know well also to Calderdale. In response, the Council in 2019 declared a 'climate emergency'. What this required was that Council's spatial strategy and its climate strategy should have been prepared as a single intertwined process, with in fact the former in support of the latter. Instead the Council has ended up in 2023 with those two strategies going in opposite directions: the climate action plan requiring reductions in carbon emissions of around 60% by the end of the local plan period in 2033, whilst the local plan continued on regardless prioritising new road capacity, near to motorway sites, and housing in unsustainable locations - and with no measurement at all of the Local plan's climate impacts. The inspector has chosen to treat NPPF's stipulation that the local plan should 'shape places to secure radical reductions in greenhouse gas emissions' as if this was a secondary or optional requirement.

If the local plan is adopted, this divergence between the top level spatial and climate strategies will be permanently and immovably embedded for the next decade when action on climate becomes fundamentally important. Isn't that a disaster for Calderdale?

Some other words also come to mind. '**Fictional**' would be one. As will be seen in the first part of this briefing the principal targets, and claimed benefits, which have been at the centre of the controversies surrounding the local plan - 15,000 new houses, 10,000 jobs, 19,000 increased population - have all been manufactured as outputs from the spurious modelling underpinning the local plan. They bear no relationship to facts and trends in the real world, and are not supported by the Council or West Yorkshire Combined Authority policies that they claim to be. They have resulted in a housing trajectory that is unachievable and, actually, a fantasy.

Therefore '**Pointless**' would be another one. Those fictional targets and claimed benefits won't actually be delivered in the real world. But the real damage to Calderdale's environment and biodiversity that the local plan will nonetheless inflict will still occur.

'**Undisclosed**' (or 'in secret') would be another. NPPF is explicitly clear: 'A wide section of the community should be proactively engaged, so that Local plans, as far as possible, reflect a collective vision and **a set of agreed priorities for the sustainable development of the area** ...' *NPPF 155* Yet the intention to set a target for increased population, or use the jobs target to inflate the housing target, was never disclosed to the Calderdale public or to councillors in the Plan's 2018 consultation version. Instead these were introduced afterwards in technically inaccessible documents and modelling. How could the Calderdale community be 'proactively engaged', and agree or disagree, with claimed priorities they knew nothing about? Councillors failed in their responsibility to adequately supervise how this set of 'agreed priorities' were inserted into the local plan process after the event, via the back door, and without consultation.

So who actually are the beneficiaries of this proposed local plan if it doesn't meet Calderdale's priority requirements and solves none of its pressing problems? Not the local communities who will be overwhelmed over by excessive market housing in the wrong places, thereby likely to cause increased traffic and congested local road networks. Won't the main beneficiaries be the principal housing and land developers who are to be gifted, free of charge by the Council, a huge increase in the value of their land banks when large swathes of Calderdale's Green Belt are transferred immediately out of their protected status, maybe never to return.

Anthony Rae
coordinator, Calderdale Friends of the Earth

Background to this briefing

1. Calderdale Friends of the Earth (FOE) has been making a constructive contribution to the development of Calderdale's draft Local Plan for more than a decade. We're just one of the environmental and community groups that rose to the challenge of examining and commenting on the huge quantity of technical detail associated with the preparation of a spatial plan. FOE submitted evidence and contributed to four sessions of the examination in public (EiP) between June 2019 and January 2022
2. However, in June 2022, after many years when we had requested that significant data be included in the Plan about what might be the consequential changes to the volume of future road traffic - which the council refused to provide, and the inspector failed to secure - we wrote to the inspector advising that **FOE were now withdrawing from the EiP and final stages of the Local plan assessment** because we were not prepared any longer to be associated with a process whose integrity had been damaged by a failure to disclose important information.
3. On 23rd January 2023 the inspector's report with its findings about the acceptability of the local plan was finally published, 3½ years after the EiP process began. The largest section of the report comprises a monotonous repetition - some 50 times - of a statement about sites that are at present in Calderdale's Green Belt, but for which the inspector now concludes that: 'overall, taking account of all factors, including identified housing need, I conclude that exceptional circumstances exist to release the site from the Green Belt'. Just two of those allocations amount to 2,700 houses, 1,257 at the Woodhouse site and 1,443 at Thornhills, both in Brighouse.
4. But in fact what really matters in the inspector's report - where the origins of the Local plan's failed sustainability lie, and which explains why so many of those Green Belt sites now face being lost - are to be found on just a few pages, and particularly between paragraphs 63-78 (pages 18-22). So that's what this briefing will mostly focus on, and then also on the crucial areas of road traffic *para.62*, and the response to our 'Climate Emergency' *para.68*.
5. As a result we hope councilors will be better informed about the substance, or lack of it, of the local plan they are about to be asked to adopt. This briefing was written in February 2023, before the Cabinet decision at its 2nd March meeting to recommend adoption, but because some of the statements made during that meeting are relevant to this text a small number of further comments have been added afterwards as footnotes.

The reality of Calderdale's real world population trends - ignored

6. It's easy to understand why the estimates of Calderdale's future population have to be the fundamental starting point for the local plan process. In general, if a district's population is forecast to rise, then more houses and more jobs will be needed. These three factors - **P**opulation, **E**mployment and **H**ousing growth - constitute the points of a triangle ('the **PEH** triangle') that dynamically interact with each other but in a way which needs to be unpacked and carefully assessed. That is what FOE did systematically in the evidence we submitted to the EiP.
7. By way of context, what councillors should understand is that the two decades preceding the local plan's preparation, and now extending to cover its life into the early 2030s, have also been ones where the UK, and many other parts of the world, have been going through a fundamental demographic transition: towards reducing fertility combined with population ageing. Did the local plan take this into account, we asked?
8. There's another important piece of background knowledge. In the decade of the 2000s the projections for the UK's future population prepared by the Office of National Statistics (ONS) went through an extraordinary surge upwards, before peaking and then beginning a progressive reduction, from the 2010-based projections onwards. We drew attention to this 'upwards then downwards' factor, as it affected the Calderdale population projections, in evidence FOE submitted to the local plan process in September 2018. This recorded the substantial reductions in each of the five most recent population projections available up to then, resulting in the estimated of Calderdale's future population at the end of the plan period in 2032/33 falling by some 21,000 - from 240,000 to 219,000.

Population projections: ONS 2016-based should be used; the consistent trend over the last five projections has been downwards, with a degree of certainty that this will continue at least during the first part of the plan period

Calderdale population in 2032 – 000s

2008 based	2010 based	2012 based	2014 based	2016 based
239.7	233	230	226	219

Extract from FOE evidence, 2018

9. At that time the ONS 2018-based projections were not available. When published in March 2020 its forecast for 2032 had reduced still further to 214,000; our assessment in 2018 that the falling projection trend would continue had proved correct. So in just a decade of population projections, Calderdale’s population forecast at the end of the local plan period had reduced from around **240,000** to **214,000**. By 2033, it would be barely 4,300 more than at the start in 2018. We were pointing this out in order to prevent a subsequent calculation of the number of new houses and jobs claimed to be required being inflated within the modelling by the use of out-of-date statistics.

10. And the population numbers have kept on coming down, so that by the time of the 2021 census it was revealed that the Calderdale population did not achieve what the 2018-based projection said it would be in 2021 - 211,387 - but was instead 206,600: around 4,800 smaller than the projection. Between the 2011 and 2021 censuses - so these are actual counts rather than statistical estimations - Calderdale’s population increased by just 2,800, from around 203,800 to 206,600. Of that increase, effectively all of it is in the 65+ age group which grew by +21%, compared to a decrease of 3% in people aged 15 to 64 years - i.e the working age population - and of 0.1% in children *censuses 2011-2021*.

11. Here is a clear starting point for the local plan’s proposals about all 3 points of the ‘PEH triangle’: population ageing and reducing fertility had reached Calderdale, like everywhere else.⁵ So what’s the disagreement with the Calderdale Council numbers? At first we were encouraged by the analysis of the publication version of the Local plan (August 2018), because the council was accepting the reality of the downward trend in the population projections that FOE was also observing. After all, if the local plan accepts that ‘as population and household numbers increase, the need for new dwellings will rise’ *LP para.2.60*, surely that same logic would apply in the opposite direction?

growth overall. In terms of local data, it shows that Calderdale’s population is projected to grow from 210,700 in 2018 to 219,300 by 2033, an overall increase of 8,600, or about 4%. This is a significant reduction in the growth projected in the previous Sub National Projections (2014) which indicated growth about 19,000 or 9%.

Table 2.4 Population Projections 2016 and 2014 Based

Year	2018	2020	2025	2030	2033	CHANGE	% CHANGE
Population (2016 Based)	210,700	212,300	215,800	218,200	219,300	8,600	4%
Population 2014 (Based)	211,671	213,946	219,333	223,896	226,385	19,009	9.1%

Source: ONS Sub National Projections 2016 Based and 2014 Based

2.43 These figures are projections, but the trend is obvious that the population is continuing to grow, but at a significantly slower rate than was indicated in previous projections, the growth is also projected to be slower than that of England as a whole. The implications of the revised population projections will be worked through by the

Calderdale Local plan publication draft August 2018 2.42-43

12. However councillors need to know that that these paragraphs were also the final statement about the size of Calderdale’s future population that the Council included when the local plan

⁵ **addition 10th March** At the Cabinet meeting on 2nd March, 2023 the Cabinet member for Planning (CMP) accepted this fundamental FOE demographic analysis: ‘The 2021 census ‘ [quoted in para.10 above] pretty well tells us that our population here in Calderdale is getting older and remaining stagnant in terms of number. Projections forward shows that Calderdale is not going to grow at all ...’ [webcast 12.40 mins](#) For the reference to ‘stagnation’, see footnote 13 below.

went out to public consultation in August 2018. The Plan itself did not contain any major proposals elsewhere in the document to the effect that the council, as a matter of policy, intended to make an unspecified major intervention in an attempt to somehow reverse this dominant population trend downwards. Instead this idea was introduced in technical documents produced during the EiP itself, so in practice inaccessible to members of the public and councillors alike.

7.15 There is an implicit assumption in the modelling of the policy-on scenario that Calderdale will see a larger net inflow of people than recorded on average historically, attracted by the creation of employment opportunities and accommodated by new homes. The 2019 Turley report (CC21) shows at Table 2.2 that under the policy-on scenario, the population of Calderdale would be expected to grow by 1,488 persons per annum on average, supported by net immigration of some 1,098 persons annually. The baseline scenario, in comparison,

Council evidence August 2020

13. FOE believes that this non-disclosure of fundamentally significant strategic objectives is contrary to the requirements of NPPF 155 which states that 'a wide section of the community should be proactively engaged, so that local plans, as far as possible, reflect a collective vision and **a set of agreed priorities** for the sustainable development of the area' *emphasis added*

14. So it was a matter of considerable surprise when in evidence submitted to the actual EIP it was revealed that the Council's own modelling for Calderdale's population - which would consequently also impact on both the number of houses and jobs required - was recommending that the district's population between 2018-33 should **increase by 19,320**. Unfortunately the CC63 documents recommending this increase did not identify the absolute population numbers for either 2018 or 2033, merely the increase between them; and this was typical of the inadequate presentation of such important numbers that FOE had to deal with. However, seeing that the 2018-based projection has the district's population in 2018 at around 210,000, it seems that the council was suggesting that it was now requiring that the population of Calderdale in 2033 needed to be around **229,400**; whereas in 2021 it was just 206,600 *Census*

15. Throughout the EiP the council never submitted any detailed demographic evidence that explicitly addressed how they believed the yawning gap between their population projections and aspirations, and the real world demographic trends would be closed: explaining how some **22,800 new inhabitants would manifest themselves in just 12 years** between 2021-33.

Flawed modelling: where the interaction between 'population', 'jobs' and 'housing' growth went so badly wrong

16. And that was just the beginning, and it was what the FOE analysis uncovered next which revealed exactly how the council's own population projection of Calderdale was more fiction than fact, and what the consequences for our environment would be. Initially it was not visible or explicitly stated in the council's technical modelling work how this population projection had been derived. But eventually FOE was able to work out how it had been done, namely by **inverting the modelling sequence**.

17. Normally the sequence would be: start with the population increase assumption, and from that model the number of increased houses and jobs that would necessarily be required in response. But what Calderdale had done instead was as follows: start with an estimate of the number of future jobs that might be created by the early 2030s and from that model the increase in population that would be required to fill those jobs, and of houses for the new employees to live in. It is this unorthodox approach to the modelling of the PEH triangle, never explicitly disclosed by the council, which then drives all the 'growth' numbers upwards.

18. You can immediately see all the problems with this approach. Let's begin with the obvious question: why would you want to base your local plan modelling on the provision of a major increase in new jobs when the August 2018 Publication version accepts that the working age population was even then already falling *in the situation where* that trend is generally prevalent all across the UK as well?

2.44 The rate of growth for different age groups within the overall population is not even. As shown in the table below, the largest growth is projected to be in the over 65's. By the end of the Plan period there are projected to be over 14,200 people over 65 year of age, with over 9,300 additional people over 75 years. Of significant concern must be the reduction in population between 25 and 64 amounting to 5,200 of the potential working age population.

Calderdale Local plan [publication draft August 2018](#) 2.44

19. So if the working age population isn't really increasing, then creating new jobs wouldn't necessarily be a first priority, let alone the one that is then also used to inflate the housing allocation. Instead economic growth should be achieved by other and more sustainable means e.g. increased productivity or labour market participation rates, both far more appropriate in the new era of universal population ageing. From where therefore did the Council derive its insistence on 'employment growth'? To understand where that came from you need to look at a crucial few words in paragraph 64 of the inspector's report.

64. The submitted Plan reflects the ambitions in the Leeds City Region Strategic Economic Plan and makes provision for above baseline economic growth, linked to the programme of economic interventions and strategic transport investment in the sub-region. The Strategic Economic Plan is in process of being replaced with the Strategic Economic Framework, but the initial Framework Vision document indicates that the broad ambitions for growth remain. The submitted Plan identifies a need for 73 hectares of new

[Inspector's report](#) para.64

20. It says that the local plan 'reflects the ambitions of the Leeds City Region Strategic Economic Plan' (SEP) and 'makes provision for above baseline economic growth'. Except that the local plan published in August 2018 didn't do that. There's just one reference to the SEP (para 14.7) which doesn't include support for whatever the SEP did say about employment numbers. In the 2018 Plan there's also no cross-reference to the policy-on jobs projection set out in the [2018 Strategic Housing Market Assessment](#) (SHMA) technical document, despite the fact that this had been published months earlier in order to provide the starting point for the council's inverted version of the 'PEH triangle' modelling. There *is* a forecast for employment growth included in the consultation version of the Plan - 8,295 FTE [LP table 6.8](#)⁶ - but this emerges almost as a secondary outcome of a process conducted for a different purpose: to calculate the amount of employment land claimed to be required [LP 6.14-25](#). That information was mishandled as well: 84% of the forecast employment increase would be in sectors not requiring a specific land allocation.

21. So, crucially, that jobs growth forecast in the 2018 Plan was presented as an output prepared in order to calculate an employment land allocation, and not as a policy-on modelling input and target that would then be used to drive not just the employment but also the population and housing numbers upwards. Its significance therefore for how it would be used in the SHMA-based modelling process was not disclosed for the 2018 consultation on the draft local plan; contrary again to the requirements of NPPF 155 that there must be community engagement around 'a set of agreed priorities' for the district - see [para.13 above](#).

22. In the EiP FOE submitted an extensive critique of using the LCR Strategic Economic Plan - with its headline ambition to deliver 'an extra 36,000 jobs' for the region - as a credible starting assumption for the modelling sequence of Calderdale's PEH triangle. We pointed out that the SEP was published in 2016, and as an update of the approach of the 2014 original. But, more importantly, that it had been replaced in September 2020 by a new approach - the 'Strategic Economic Framework' - which did **not** include an employment growth target. The SEF, quite correctly, now emphasised the priority to be attached instead to productivity growth, which has long been recognised as the structural weakness in UK economic performance and its low real wages. We advised the inspector in September 2020 that the LCR SEP was about to be replaced by the SEF ([FOE Matter 7 para.14 Sept 2020](#) and [WYCA](#) minutes 'That the Combined Authority agree that the SEP expires at the end of March 2021, and continues to be used for Growth Deal programmes until then.').

⁶ The local plan employment documentation actually uses 3 versions of the same number (in its policy-on scenario): 8,295 FTE; 10,318 total jobs created over the 15 years plan period; and 12,468 total jobs over a longer 19 years period. So the 8,295 number quoted in paragraph 20 is consistent with the 10,318 jobs 'target' referenced on the page 2 summary.

23. Consequently the inspector's statement in paragraph 64 (displayed above) that 'the strategic economic plan is in process of being replaced with the strategic economic framework' is factually incorrect. NPPF 158 is clear that information on such fundamental matters should be up-to-date, and in demonstration of this the inspector's report, published in January 2023, refers to decisions taken by the WY Combined Authority just one month earlier in December 2022 *Insp para.122*

24. And the misleading continues. The inspector's report *Insp 70* claims that the delivery of the 14,950 housing allocation 'would support the council's employment strategy'.

70. The figure of 997 dpa broadly aligns with the updated policy-on growth forecast of 999 dpa in CC63b. The delivery of 997 dpa (14,950 over the Plan period) would support the Council's employment strategy in the Plan and links with identified economic interventions and planned infrastructure investment in the

[Inspector's report para.70](#)

Except that the Council's actual employment strategy- the [Inclusive Economy Strategy](#) - contains no reference at all to quantified jobs growth, but instead - and again correctly - emphasises productivity growth and increased labour market participation, as FOE had done previously.

25. So where did the council's modelling derive its jobs growth target number of 10,318 from? It's from the modelling scenario termed 'Policy-on Plus Transport' which claimed that jobs would be created and boosted by the infrastructure investment funded by the West Yorkshire Combined Authority, primarily consisting of increased road capacity via the 'corridor improvement programmes'. Did the EiP ever consider or debate the question of whether increased road capacity would indeed lead to such jobs? It did not. This claimed link between economic growth and road infrastructure has long been contested and the latest summary finds that it is weak or non-existent.⁷ Additionally FOE were asking: 'if you're basing your employment and housing growth assumptions on increased road capacity, which would then lead to more road traffic, what about the carbon emissions that would also result?' *And see para.62 below about the problem with undisclosed traffic data.*

26. So the FOE submission to the EIP, contained in evidence repeatedly put in front of the inspector, was that the employment growth assumption inserted crucially right at the start of the council's modelling sequence was wrongly derived and incorrectly targeted, and consequently was inappropriate as a source from which to then derive both the subsequent population and housing growth numbers. The inspector on the other hand reaches a judgement that, more generally: 'The Council's evidence captures a wide range of recent data and incorporates **robust assumptions** relating to demographic and economic trends.' *Insp 69.*

69. Identifying housing needs is not an exact science and the links between housing and jobs growth are complex. Employment forecasting is also subject to some inherent uncertainties. However, having considered all of the evidence before me I consider that the policy-on employment forecasting and updated assessment work in CC63/63b provides a reasonable basis for informing Calderdale's housing needs over the Plan period. The Council's evidence captures a wide range of recent data and incorporates robust assumptions relating to demographic and economic trends. The policy-on modelling allows

[Inspector's report para.69](#)

But that paragraph is full of qualifications and equivocations - there are references to 'not an exact science', 'inherent uncertainties', 'difficult to predict and quantify', 'could be reasonably considered through future Plan reviews', etc - and FOE's assessment remains that the demographic and economic assumptions underpinning the local plan modelling are anything but 'robust'.

27. There's one final twist to this argument. If Calderdale announces its aspiration to create an additional 10,000 jobs by 2033 - which in turn requires population growth of 19,000 and housing growth 15,000 - then where is the economic strategy that will actually make those 10,000 jobs happen in the real world? Because the council does not have such a strategy, that is focused

⁷ See e.g evidence submitted by [Transport for Quality of Life](#) to Transport Select Committee inquiry into road investment, 2023

upon job creation, and nor does the local plan contain or cite one. That a council simply asserts that it would like 10,000 more jobs in the local economy doesn't make them actually appear. And what if, at another point of the PEH triangle, additional population has been attracted to Calderdale, but then the jobs growth in parallel does not occur; or the other way round: the jobs growth happens but not the housing growth? In both cases won't people just be commuting unsustainably from outside the district?

28. Let's connect back to the real world and ask what has actually happened to the number of jobs in Calderdale, now 5 years into the local plan period, compared to the numbers set out in the publication version in August 2018? It stated that the district's 97,200 jobs in 2016 were projected to grow to around 106,100 jobs in 2033; so an increase of around 9,000.

2.1 Calderdale has approximately 210,700 inhabitants (ONS 2016 - based sub-national projections) and possesses around 97,200 jobs (2016). The projections of population growth suggest that Calderdale could grow to over 219,300 by 2033 with around 106,100 jobs. Halifax is the main town and the focus for administrative services, employment,

Calderdale Local plan publication draft August 2018 2.1

29. Whilst it's not known what is the data source for the 2016 number (to make a consistent comparison) it's clear that all measures of employment have reduced in the period 2016-21: 'employees' down from 96,000 to 91,000 (including a marginal increase in part-time), and 'employment' from 99,000 to 94,000.⁸ This trend was also occurring pre-Covid. Surely what this shows is that the ambition to grow Calderdale's economy, and to increase the economic welfare of its inhabitants, should have been based in different strategies - to increase productivity, or labour participation rates in quality jobs - and not by 'increasing employment numbers'. That was the FOE position throughout, and is also that of the Council's own inclusive economy strategy (see para.24)!

30. So much for the 'employment growth' assumption. What about the 'population growth' and 'housing growth' outputs which the council's modelling then came out with as a consequence? We've already noted that the council's population growth assumption was completely at variance with the long-term trend of what was happening to Calderdale in the real world. In the EiP FOE accepted that such as the ONS projections can be a starting point for the refinement of a district-specific population and housing calculations, in order to take account of such as suppressed household formation etc.⁹ But that cannot be a justification for a modelling process that produces outputs that move so dramatically in the opposite direction to real world data and trends.

31. And FOE asked: where will this additional population come from? It turns out there are two answers to that question. The first is that the 'additional population' is in fact a figment of the Calderdale modelling, generated autonomously by its inbuilt assumptions: 'From 2018 onwards, population *changes to the extent that ... it is required* to support the specified level of annual employment growth ... A higher level of net internal migration is *assumed to occur* if there is insufficient population and resident labour force *within the model* to meet the forecast change in employment in a given year. The model therefore *makes its own assumptions* on internal migration flows into and out of Calderdale' *Appendix 1 'modelling assumptions' in CC21, emphasis added.*

32. The second is that (not surprisingly) the council never submitted its own demographic evidence to explain in detail how it intended to implement its proposal to artificially grow the Calderdale population. There was no apparent awareness as to the demographic feasibility of such an attempted policy intervention across the relatively short timescale of a local plan period. When asked by the inspector in September 2020 to explain 'Where will the necessary workers come from to achieve the 'policy-on' employment forecast?' - the Council revealed its intention to undertake what amounted to a 'Green Belt for additional population' swap whereby its deliberate allocation of quantities of Calderdale's Green Belt for housing development would be used to

⁸ So NB the point is not that jobs in Calderdale have reduced from the 97,200 level in 2016 recorded in the 2018 local plan; simply that they've reduced over the period 2016-21.

⁹ **addition 10th March** At the 2nd March Cabinet meeting the Cabinet member for Planning (CMP) referenced a housing association waiting list of 7,251 as one of the justifications for the housing allocation target [webcast 14.0 mins](#). But in practice policy HS6 Affordable Housing isn't particularly demanding so that, at the rate eventually accepted by the inspector - 224 affordable houses per annum [Main Modification 97](#) - it would take 32 years - until 2055! - to clear that waiting list.

attract population from our district's immediate neighbours or further afield [Council M7 paras.7.15-21](#) ¹⁰

33. A first question would be: how consistent is this with the West Yorkshire [Statement of Common Ground](#) (March 2020) where all the West, South and North Yorks authorities agreed to meet their own housing need 'within their own local authority boundaries', and in situation where 'based on current plan targets ... there is no housing shortfall or distribution of unmet need required'. So if 'housing allocation dumping' across district boundaries is ruled out, doesn't that also apply to 'population cohort poaching'?

34. And it's not sustainable development - the fundamental requirement of NPPF - but rather a direct trade off: 'economic growth at the expense of the environment'. Nor is it something that Calderdale Council said, openly and explicitly in the 2018 publication version, that it intended to do.

35. As to the [housing growth](#) number, during the EIP opening session (26 June-5 July 2019) FOE and the other groups made a major effort to present to the inspector that there were unresolved issues, as we've described above, within the modelling of the triangle of PEH numbers. We believe that it was this that prompted the inspector to write to the council on 16th July 2019 (with a request for an initial answer by 12th August), with this choice: 'I am concerned that the plans provision for housing would not adequately support the employment growth advanced by the plan, and could result in higher rates of in-commuting , or conversely impact on the ability of businesses to grow and develop. ... Or alternatively, the council may wish to revisit the economic strategy to better align with housing growth. [INS7](#) extract from para 12 ,

36. But what then angered FOE and the other groups was that, despite the fact that it was us who had prompted the inspector to raise this issue and offer that choice, the council chose to make an immediate response (on 29th July - just 8 working days later) without any public notice that it intended to do so, let alone consultation on the substance. This effectively closed off any genuine choice between the two options by prematurely decided in favour of a higher housing allocation.

4. Our first action has been to commission Turley (who prepared our 2015 and 2018 SHMAs) to carry out further analysis and updated modelling. This work will establish the labour-force growth, and by association job growth, that could be expected to occur where the housing requirement of 840 homes per annum is delivered. Turley will also re-model the housing growth needed to support the Baseline and Policy-on job forecasts presented in the 2018 SHMA, reflecting the references made to both scenarios in your letter. I expect to receive the draft report from Turley on 26 August 2019.

5. The Council recognises that an increased housing requirement would necessitate additional sites being allocated. Planning officers have therefore started considering how potential changes to housing requirements could be potentially accommodated through allocations;

[Council response](#) to post stage 1 hearing letter, 29th July 2019

37. It was this hasty decision in July which demonstrated an intention to set aside reasoned discussion around the evidence, and an unwillingness to respond to issues of great concern to communities across Calderdale that had been expressed in EIP stage 1. FOE believes that this was another breach of the spirit of the principles of NPPF paragraph 155 - about proactive engagement with the community 'so that Local plans , as far as possible, reflect a collective vision and a set of agreed priorities ...'.

38. And so in October, the Council increased its housing allocation, already unsoundly based, still further. As the inspector records it: 'Following the Stage 1 hearings the Council proposed in CC39

¹⁰ [addition 10th March](#) The CMP spoke about the potential problems associated with population decline and ageing - such as schools closing due to insufficient children, those children having to move away 'because there are no jobs', and a reduction in economic activity [webcast 13.10](#); there was also a reference to sustainable communities needing 'a mixed age structure'. It was as if there was no nuanced understanding of the complex issues that arise in this profound demographic transition - see this [ONS blog](#). But that article relates to the possible contribution that [international](#) migration might make in a situation of population ageing. The idea that Calderdale should attempt to solve *its* population ageing problem by a process of encouraging [internal](#) migration so as to 'poach' younger age cohorts from nearby cities [webcast 14.0 mins](#) - thus exacerbating *their* circumstances - is just demographically illiterate.

that the housing requirement in the Plan should be increased from 12,600 to 14,950 dwellings over the Plan period. The proposal to increase the housing requirement, rather than reduce employment growth, is a reasonable and justified response taking account of all factors.' *para 66*. FOE doesn't believe it was either 'reasonable' or 'justified' to set aside the issues described in the paragraphs above by ... simply ignoring them.

39. Instead in the October 2019 Cabinet report, the arguments submitted by FOE to the EiP were either misrepresented, or even caricatured. It was never, for example, the submission of FOE that economic growth should be 'restrained to baseline level or below'.

NPPF. Conversely it is considered that an approach that sought to restrain growth to baseline level or below would conflict with the NPPF and therefore be difficult to defend at the forthcoming hearings. Moreover, it could undermine the economic resilience of Calderdale at a time of uncertainty over the national economic outlook.

Plan. Therefore, aside from the planning policy conflicts of doing so, there is not in any case a straightforward option to reduce or restrain economic growth, without impacting on or having to extricate ourselves from existing programmes and projects that are already occurring beyond the Local Plan.

[*Report to Council Cabinet 19th October 2019*](#)

Instead we were asking the entirely reasonable question: what is the best and most sustainable way in which economic growth could be achieved? We had asked that the Regional Econometric Model (mentioned in *Insp para.411*) could be introduced in some way into the EiP to allow an exploration of these issues, but it never was.

40. Consequently the choice being offered by the inspector's letter had to be 'talked' into the October 2019 Cabinet meeting minutes by statements from Cllr Dan Sutherland (the previous chair of the Local Plan Working Party) and by FOE.

Councillor Sutherland addressed the Cabinet and highlighted a concern that consideration had only been given to one choice from the Inspector's letter, in relation to increased housing allocation; however a key part of the Plan was to revise economic growth and this was something which could be considered. There were not many opportunities for the Council to make decisions in Planning, and once greenbelt sites were built on, there would be no opportunities to change this which would have a lasting impact on Calderdale. In essence, what were the tangible benefits on these sites and how would these be balanced and tested?

Mr. Rae (Coordinator of Friends of the Earth) addressed the Cabinet and acknowledged the views of Councillor Sutherland. It was key that members of the public would be able to comment on housing proposals in the greenbelt and that reviewing the economic and employment strategy was an important part of the process. It was unclear whether all members of the public understood the option presented to them.

[*minutes of Cabinet meeting 19th October 2019*](#)

41. In the subsequent consultation document *CC 39* no reference was made to the inspector's second option 'to revisit the economic strategy to better align with housing growth' - so yet another example of nondisclosure - and therefore consultees were not even aware of its existence.

42. Finally, what has the inspector made of all the above FOE analysis relating to the modelling of this triangle of PEH assumptions? No one knows. During the EIP sessions the inspector made no comment whatsoever, positive or negative, about the FOE evidence, whilst the report *paras 64-73* also makes no mention of any these issues. Instead, the conclusion is asserted: 'the policy-on employment forecasting ... provides a reasonable basis for informing the council's housing needs'.

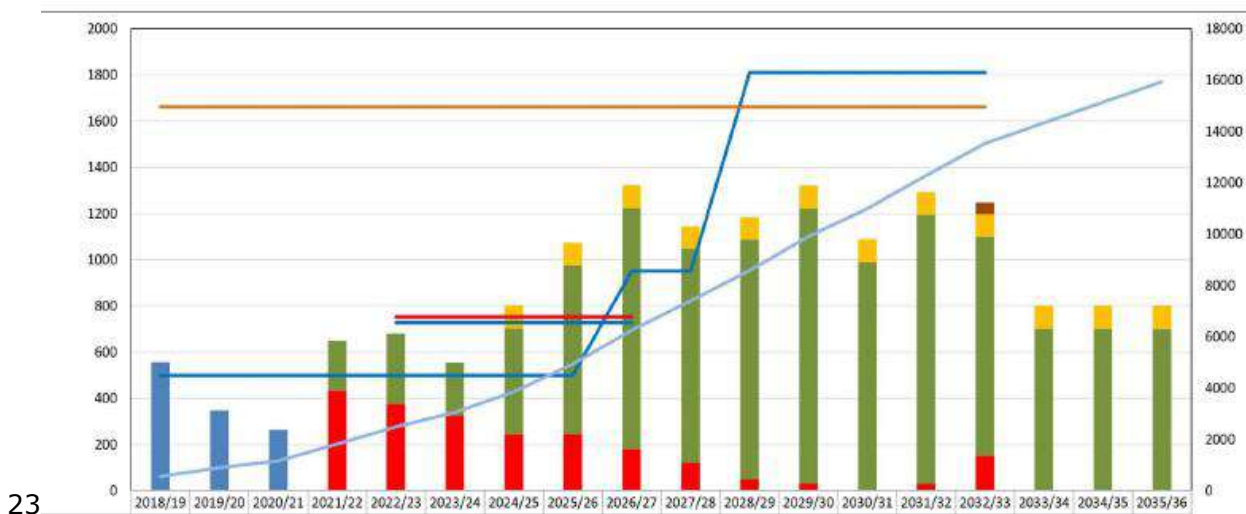
43. As a basic point about the transparency of the local plan process you have to ask: Is it appropriate for a local plan inspector to simply make no reference whatsoever to cogent and reasonable challenges, supported by detailed evidence, to the position proposed by the council and then accepted by that inspector? The inspector's disclaimer at *para.38* - that 'this report deals with these main issues. It does not respond to every point or issue raised by representors' *para.38, emphasis added*, a reference to the government's [Procedure Guide for Local plan](#)

[Examinations](#) - is an inadequate defence of this approach. By omitting any mention of our strategy-level challenges in even 1 of the report's 517 paragraphs - such that there is no public record that they were ever made - the inspector has presented only a partial account of the evidence submitted to and heard by the EIP and has thus opened up their report to legitimate criticism.

An unachievable housing trajectory

44. And on the most contentious issue of all: the number of new houses required to be built each year? Absurdly the council first asked for an increase in the housing allocation and then, as the EIP proceeded, suffered the humiliation of having to admit that it could not actually deliver that increased allocation within the local plan period!

45. That situation is illustrated in the extraordinary housing trajectory proposed by the council and accepted by the inspector (as below, but it needs to be viewed at full magnification in the [Main Modifications](#) document page 23 and then compared to the original trajectory on page 21).



Proposed local plan housing trajectory

46. The original trajectory, produced in the very first months of year 1 of the Plan period (August 2018) showed an immediate acceleration from the delivery trend rate over the last decade at or below 500 dwellings per annum (dpa), up to initially in excess of 1000dpa and then to methodically build for the rest of the plan period at a rate of between 800-1000dpa.

47. By contrast, the revised trajectory reached by the end of the EIP, and accepted by the inspector, shows ever dwindling delivery in the opening years of the Plan (the first 3 blue bars), partly due to the particular circumstances of Covid. This trend then continued in years 4 and 5 such that total completions up to 2022/23 - for the first third of the entire plan period - are likely to be around 2,100 only. Thus even the trajectory's reduced delivery rate averaging 500dpa in the initial 5 years to March 2023 has not been attained. After 8 years at 500dpa the planned completions rate is then meant to almost double to 950dpa for the two years 2026-28, before doubling again to 1810dpa for the remaining 5 years of the plan.

48. At the same time the housing trajectory itself (the bright blue line) is also somewhat fictional. The red/green/yellow bars in the trajectory diagram, which distinguish between the various sources of housing delivery (existing planning permissions, new allocations, and windfall) continue forward from 2026 at around 1,200dpa, so that by the end of the plan period in 2033, only 13,528 (out of 14,950) completions will have been delivered, with the remainder to be provided in years after 2033. Allowing for the completions shortfall in the first 5 years just mentioned, average delivery of new houses would need to average around 1,150 annually for the remaining 10 years of the plan. Is that really going to happen?

49. How do those elevated delivery rates compare to what has been achieved by Calderdale's housing developers in recent decades? In the two years 2006-8, at the heart of that decade's housing boom, Calderdale briefly recorded completions of around 1350 p.a - a situation

generated, as hindsight revealed, by excessively loose housing market financial conditions - before after the resultant slump completions collapsed to below 500dpa of the next decade in all but two years. This Calderdale-specific recent experience must throw major doubts on the credibility of the proposed local plan housing trajectory.

50. FOE regards it as bearing little relationship to what will actually happen in the real world. The inspector on the other hand states that it 'reflects step changes in the level of housing expected to be delivered' and as 'justified' *Insp 76*. On top of the trajectory the inspector is also of the view that 'there will be *large* windfall sites that come forward in the latter part of the Plan period which are not identified in the Plan, which could further increase supply' *Insp 446, emphasis added*

51. So is the credibility or not of this proposed housing trajectory - which has underperformed below its minimal expectations for the first third of the Plan period, then must double and double again, and maintain itself at that extraordinarily high rate for an extended period of 5 years - is that just a matter of an inspector's judgement? First of all, how can anyone know what the state of the housing market will be in the late 2020s-early 2030s? How can it be sensible to assume for strategic planning purposes that there will be ultra-favourable housing market conditions almost a decade into the future?

52. But the reality of what this extreme housing trajectory represents for Calderdale's housing provision over the next few years is much more serious, but also not disclosed in the inspector's report. It's proposing that a very large amount of attractive developable Green Belt land will be transferred out and released into the hands of developers immediately in 2023. The local plan's road infrastructure schemes are meant to be completing in the next few years¹¹, and the first wave of new job creation it's seeking to generate ought to be under way. But over that same period there will be little new housing being constructed, according to the approved delivery trajectory and the accepted lead-in times for site development *Insp 440* .

53. Could it be that the local plan housing trajectory and the inspector's report contain a **basic internal contradiction**: the growth agenda and the promotion of Calderdale's prospects have been **front ended**, at the same time as actually meeting those needs has been delayed and **back ended**? Isn't there a probability that housing need and lack of affordability, already exacerbated in recent years by rising house prices and the council's general promotion of Calderdale as an 'attractive place to live and work' could actually worsen still further?¹²

54. Is there a possibility that Calderdale is now caught in a 'stagnation trap' of the council's own making? According to the inspector's approved trajectory, Calderdale is still set to continue with its decade-long rate of low housing delivery until late into the 2020s. By then the fact that Calderdale's total and working age population is actually falling will have become apparent beyond argument in the official statistics. (Despite the inspector's attempt to argue that there is an absence of confirmed evidence for future household projections *Insp 68-69* the 2021 census demonstrated that household numbers in Calderdale grew just 1,879 since 2011; the 2.1% increase way below that of the other WY districts, Y&H region and the UK. Why ignore all the trend data?) And if that happens to population numbers then the mythical jobs growth won't have happened either, unless that is by increased and unsustainable in-commuting (as the inspector appears to recognise *Insp 71*). Even 'growth by promoted in-migration onto the Green Belt' - which is the council's policy - won't be taking place because the new housing won't be there to cater for the imaginary tide of new workers.¹³

¹¹ Although in December WYCA 'paused' a significant proportion of their predominantly road infrastructure schemes, a situation which is now being replicated [nationally](#).

¹² [addition 10th March](#) Cabinet member for Planning (CMP) : 'People who during the pandemic were in flats in Leeds, and who looked longingly over the boundary to places like Calderdale. And of course it's been on the TV and lots of people would like to move here and enjoy what we have.' [webcast 14.0 mins](#)

¹³ [addition 10th March](#) As previously stated this briefing was written in February, so before the Cabinet meeting on 2nd March. The CMP stated then - as the first answer to the question 'what problem is the local plan trying to solve' - the idea that Calderdale needed to respond to 'possible stagnation', principally demographic in origin [webcast 12.0 mins](#) The implication of that statement must have been that 'responding to stagnation' was the strategic intention of the local plan published in August 2018 [webcast 26.50 mins](#) But that's not the case. The word 'stagnation' (and analyses relating to it) doesn't appear in the Publication Draft, in supporting documents such as the 2018 SHMA or CC63, or in the Inspector's report either. The council did not utilise the concept in evidence in any of the EIP sessions. Introducing the 'stagnation' rationale now is an attempt to rewrite the purpose of the local plan in order to retrospectively find a justification - albeit one that still fails analytically - for where the local plan has ended up in March 2023. It's illegitimate for the council to mislead in this way.

55. By the second half of the 2020s Calderdale's real housing problem could be the same as it is now: unaffordability and the absence of new housing in sustainable urban locations; the tackling of which FOE consistently urged. The only way Calderdale could break out of this 'stagnation trap' would be if developers - having already immediately secured a massive boost to their land banks by the Green Belt transfers that follow local plan adoption¹⁴ - attempted to overturn the trajectory in some way; maybe to realise the financial value of the allocations gifted to them before they're taken away by a further change in national planning policy. But for that to happen would involve accepting that the trajectory now proposed to be adopted is indeed fictional.

And this was before the Government's December 2022 bombshell!

56. All the above disagreement about what should be the amount of additional new housing provided in the Calderdale LP was conducted within a technical framework - called the 'standard method' - for making such calculations which is imposed by central government: *Local housing need* is defined as 'the number of homes identified as being needed through the application of the standard method set out in national planning guidance'. The 2018 publication draft was prepared on the basis of the standard method, which was also referenced in the 2018 SHMA.

57. But then in December 2022 the government in its intended revision to NPPF (now out for consultation) proposed that the standard method should no longer be a requirement, rather simply an 'advisory starting point' for calculating the housing allocation number, thus offering local planning authorities greater freedom to choose whether a mechanically derived requirement really does best suit local circumstances and deliver sustainability. And this has happened at just the moment when **Calderdale can no longer make that choice anymore** because its EiP process has ended. The choice was offered in July 2019 but spurned, and now the resultant increased 14,950 allocation is embedded immovably within the local plan.

61. To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area (see

58. What does the government's proposed NPPF revision say about the special protection meant to be afforded to Green Belt land in constraining development pressures? One crucial sentence has been added.

142. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Green Belt boundaries are not required to be reviewed and altered if this would be the only means of meeting the objectively assessed need for housing over the plan period. Strategic policies 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

[Government proposed changes to NPPF December 2022](#)

59. FOE is not in a position to advise about how this latter revision should be definitively interpreted, and what it might mean for the particular circumstances in our district. But the sentence's implication seems clear: Green Belt boundaries should not be altered if doing so is the only way - that is, the principal way - being proposed to meet (in our case, inflated) housing growth numbers. But that's just what has happened in Calderdale.

60. If the Local plan is adopted, the choice made by the Council in 'betting' on an even higher housing number in July-October 2019 has gone spectacularly wrong. After an unprecedentedly long EiP - started in June 2019 and ended 43 months later, which consequently delayed and grossly distorted the housing trajectory - what's the outcome on the PEH triangle of 'growth'

¹⁴ addition 10th March At the 2nd March Cabinet meeting it was emphasised that local plan adoption is just the start of the process and that individual site allocations might still be refused when subsequent planning applications came to be considered. webcast 16.0 mins But this conveniently ignores the reality that the loss of Green Belt protection occurs irretrievably and immediately in 2023 on adoption.

issues? On **population** the real world numbers continue to in the opposite direction to that proposed by the Council. On the **employment** numbers it's the same . And on **housing** it's quite possible that the contradiction that the Council has managed to create within the housing trajectory - see paragraph 53 - will result in the real problems relating to affordability and availability actually getting worse.

61. *Aside* - FOE understands that it has been claimed by some councillors that the arguments being put forward by environmental and community groups against the housing allocation proposals of the Council is simply based on NIMBYism - an essentially selfish attempt to protect green fields and Green Belt in their immediate area, and in disregard of genuine housing need. FOE cannot speak for those other groups, but knows from experience that the arguments *they* have put forward against the council's PEH analysis are based on genuine concerns, expertly articulated. As for FOE's position it is hoped that the above analysis demonstrates that our opposition to these core underpinnings of the entire local plan are based on grounds that are far more substantial.

The Local plan's traffic impacts - not disclosed

62. For the entire decade that FOE has been working on the developing local plan, we knew that having information about what might be its consequences for the level of road traffic would be highly significant: across the district as a whole, and in specific communities where the topography and associated inability to expand road capacity should be setting constraints to the level of proposed development in that place. In 2010 the Council's then transport consultants SDG produced a study which displayed such impacts admirably (download [here](#); look at the figures between pages 26-49)

63. But then it became apparent, in versions of the local plan produced before the August 2018 publication draft, that this approach had been set aside. A section of the Plan entitled 'transport' had now been replaced by 'infrastructure & master planning', and indeed the local plan text had no quantified information at all about levels of road traffic. FOE made repeated requests for this information to be included. It never was, even when a council resolution was passed (and supported by the controlling Labour group) requiring that it should be [21st June 2018](#). Anomalously FOE was able to gain access to the output of the Calderdale Strategic Transport Model (this is the CSTM referred to in the inspectors report 113/127), and used that data in our own submissions. But that was never the point. Surely all local plan consultees, communities and councillors needed and had a right to know how the local plan and its proposals might affect the quantity of road traffic in their area, and its air quality, and the resulting carbon emissions? If they didn't, how could they contribute views and submissions that were informed by the facts? FOE was agnostic about what the data might show. We knew that, if available, 'policy-on' traffic forecasts might show an increase, or little change, even a reduction. But without the data being available, nobody would know.

64. So, on the very first day of the opening session of the EIP FOE pointed out to the inspector that participants and the wider public still didn't have access to future traffic forecasts, which was consequently hindering our ability to submit evidence and arguments on a range of significant topics. The inspector accepted the legitimacy of this point and requested the Council to prepare a note on this absence.

	Resolution to inspectors	
7	Produce a note on where traffic growth is concerned and where the data is provided. Within this note set out the reason why the Model was not open the public and not within the Examination Library	

And here's a revised version of the task produced in in March 2022, more than two and a half years later, by which time the note had still not been produced despite repeated reminders by FOE that it remained outstanding.

7	Produce a note on where traffic growth is concerned and where the data is provided. Within this note set out the reason why the Model was not open to the public and not within the Examination Library CMBC – since Stage 1 the Council has produced new modelling work (see CC62, CC62a and CC62b), and access to the model was provided for those who requested it. At the Stage 4 closing session, the Inspector agreed that this task has therefore been superseded.		
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Inspector's task list [2019](#) and [March 2022](#)

65. To explain the **bold letter** comments from CMBC: the 'new modelling work' referred to had been published in May 2020, and in the same inadequate format which led to FOE's original complaint because the district-wide impacts were not visible; 'access to the model was provided for those who requested it' means in practice to almost nobody, and none of the other environmental/ community groups had it; the 'stage 4 closing session', which may have taken place in January 2022 was in private, and no one had the courtesy to inform FOE that our request for this significant information had thus been summarily dismissed.

66. Not that it mattered anymore because by then all the public hearings, and all the evidence prepared by FOE and other groups had taken place without the quantified traffic data being available. FOE made one last attempt to secure it in May-June 2022, which made a little progress but then collapsed. At this point, FOE reached the conclusion that the integrity of the EiP process as a whole had been damaged by this failure to disclose critical information and so withdrew from participation in its final stage.

67. As set out in the task 7 note an explanation was never provided as to why the CSTM was not open to the public, and it's the case therefore that since the model was not available 'within the Examination Library' then it was not formally available for interrogation by EiP participants. And, from the published report it's not even clear whether even the inspector had access to the CSTM and its detailed data.

Last and apparently also least - how does the Local plan respond to the Climate Emergency?

68. And finally to climate change, where the inspector generously allocates a couple of paragraphs to the issue, and how a spatial development strategy might contribute to tackling it *Insp 451-2*. As you'd expect FOE had submitted comprehensive submissions on the subject. We introduced into evidence the findings of the highly significant carbon emissions reduction pathways (CERP) study undertaken by Element Energy for WYCA, and then later replicated separately for Calderdale itself. [FOE M24](#)

69. We pointed out that in 2015 - 5 years previously - we had asked Calderdale's Cabinet to commission a modelling and quantification of the local plan's carbon impacts. They declined to do so. And throughout that same period the council was also failing to disclose what would be the consequences in terms of the contribution of vehicle emissions as a result of possible changes to the level of road traffic, and of measures to increase road capacity proposed by the plan - as described in this briefing's previous section. So, in relation to the local plan's general carbon impacts and those specific to road traffic, the EiP had no quantified evidence whatsoever available to it.

70. By way of establishing a framework within which policy measures to reduce carbon emissions could be added to the draft local plan FOE:

i) highlighted the requirement of NPPF's paragraph 93 that a local plan 'should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions ...' We insisted that 'the lesson from the CERP study for Calderdale's local plan is that it is absolutely essential that every possible aspect and mechanism of the Plan must be utilised' ... so as to comply with NPPF 93.

ii) commented that the draft Plan did not include any policies requiring systematic carbon reduction on an annual basis, as is required in practice by the 2008 Climate Change Act and if the newly published CERP reduction pathway came to be implemented in West Yorkshire.

iii) argued that, in relation to Calderdale's largest emissions segment – transport: 'the local plan must be in a position where it has quantified the level of future road traffic in both a baseline

situation, and then as a result of policy-on proposals for additional infrastructure. And yet that is precisely the information that has not been provided' - as we noted in the previous section.

iv) provided the citations to the relevant 'best practice' guides published by the planning professional bodies TCPA/RTPI; and accompanied that by identifying specific and detailed model decarbonisation policies - including those pioneered in Greater Manchester, which had set a quantified reduction target and established 7 high-level measures to help achieve that - and for the energy efficiency of buildings as recommended by the UK Green Building Council.

71. All of these suggestions and recommendations were ignored by both the council and the inspector. In terms of the key NPPF 93 requirement, so obviously relevant to a spatial plan, the inspector's report makes no statement as to whether the Calderdale plan is compliant with this stipulation or not. Apparently some parts of NPPF are more important than others. The best that the report can manage is the comment that 'the council target is a borough wide aim and is not a specific local plan target. However it is key contextual information and appropriate new signposting to the local reduction target in the supporting text would assist the plan's effectiveness in tackling climate change' *Insp 452*

72. What the inspector appears to be referring to is the absence of a connection between the quantified Calderdale local reduction target set out in the accompanying text and the wording of the principal climate policy CC1 itself *MM40*. But FOE had drawn precisely this omission to the attention of the inspector with the request that it be rectified.

Adequacy of policy CC1, and of the general local plan approach to carbon reduction

25. This was the subject of comments raised in my responses [10988] to the Publication draft Lpp798 01/10/18 07:16 and Lpp799 01/10/18 07:17. At that stage FOE was arguing that 'The policy needs to include reference to the proposals of the local plan contributing to and being constrained by the local Calderdale carbon reduction target of 43.7% by 2032. The previous version of the target - a 40% reduction by 2020 - was adopted by Calderdale Council in 2012.'

26. But it's now clear with our state of knowledge as of July 2020, particularly with the data and findings of the ERP study, that the entire approach of this policy is no longer adequate. It will be

[FOE climate evidence August 2020](#)

73. The policy needed to be amended, we said, so that it would 'provide sufficient direction to other parts of the local plan' - as per our suggestions in paragraph 70 iv) above - so that the local plan would be 'able to discharge a fundamentally important role of steering the district along a pathway' to Net Zero. Both the council and the inspector should have responded positively to this request but did not do so.

74. Although the specific reason why Calderdale FOE withdrew from the local plan process last year related to the non-disclosure of traffic data, our more fundamental concern related to the situation, clearly evident even before the inspector's report was published, that instead of the council's climate strategy and spatial strategy supporting each other, with the latter effectively subordinate to the former, instead they were and are divergent from and contradicting each other. If the local plan is adopted, that fundamental flaw will now prevail, ruinously, for the next decade.

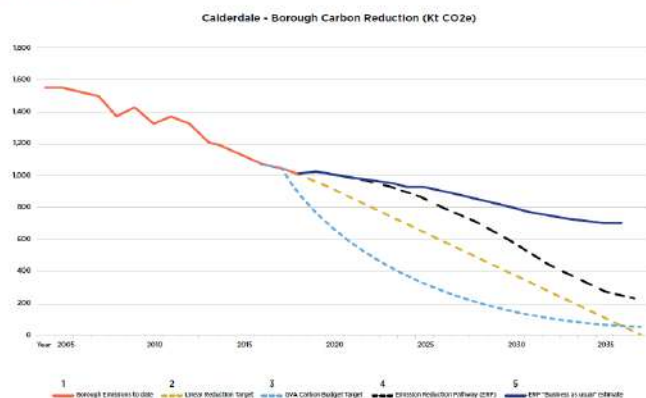
75. As a matter of important detail the Calderdale carbon reduction trajectory is described in a revised textual paragraph in the main modifications for the local plan *MM39*.

10.2 In 2021, an updated interim national target of achieving a 78% cut in carbon emissions by 2035 was set by the UK's Sixth Carbon Budget and enshrined in law. Calderdale Council, working with partners through the Climate Change Working Party, has adopted a specific science-based target for the Borough of net zero by 2038, with significant progress by 2030. This equates to a carbon reduction 'in the order of 85%' by the end of the Plan period based on the following calculation. The UK total GVA is compared to that of Calderdale from 2011 to 2016. The carbon budget (2018-2100) for Calderdale is then apportioned based on Calderdale's average proportion of UK GVA for the period 2011-2016. This can be used as an economic metric to apportion carbon budgets. This provides a carbon budget of 7,960 ktCO₂ for 2018-2100. To remain within this Carbon Budget and provide a net zero transitional period emissions have to be cut by 14% year on year and become net zero by 2038. Starting from a 2018 Calderdale annual emissions value of 1,039 ktCO₂ a reduction of 14% year on year will mean emissions have to fall to a residual 127 ktCO₂ by 2032 equating to an 87% cut in emissions.

[Main Modification to local plan climate text](#)

This implies that the Calderdale carbon budget will need to be cut 'by 14% year-on-year'; starting at a 2018 baseline of 1,039ktCO₂. When annual reductions are calculated at that percentage rate, it results in a fall to 311kt in 2025 and then to 146kt in 2030. This is approximately what is displayed in the graph in Calderdale's 2022 Climate Action Plan (dotted blue line 'GVA carbon budget target').

2.1 MEASURING PROGRESS



[Calderdale Climate Action Plan page 56](#)

76. Whilst it's true to say that the Action Plan does not actually choose between any of the 3 reduction pathways it displays, the GVA pathway's '14%p.a' methodology results in unequal and in practice unachievable annual reduction tranches, with 60% of the calculated reduction between 2018-33 having to be achieved in the first 5 years of the local plan period to 2023 – i.e by **now** – and 87% in the first 10 years to 2028. By contrast, the annual reductions to the pathway produced by the Element Energy Calderdale specific CERP study (the dotted black line) are more credible.

77. So even the textual description of the quantification of Calderdale's carbon reduction pathway set out in the Local plan is in practice incorrect and not utilisable for implementation purposes.

Sustainable Development: properly balanced or overturned?

78. Friends of the Earth is an organisation that understands and is dedicated to the promotion of 'sustainable development' (SD). This requires having regard to not just environmental issues but a proper integration and optimisation of all three sustainable development 'pillars': the economic, social and environmental. NPPF has the same approach: 'the purpose of the planning system is to contribute to the achievement of sustainable development' *paras. 6-10* and it includes other statements about the process by which SD should be demonstrated and tested within the local plan's assessment. So, right at the start of the EIP, we submitted evidence reminding the inspector about the obligation to do this [FOE M2 appendix](#) We particularly requested the inspector to check how all three pillars were being optimised with equal weight, and that 'disbenefits' were considered as well as 'benefits'. This was in anticipation of the usual practice where the 'economic' pillar is given greater weight, and disbenefits ignored.

79. The inspector's final report reaches this judgement: 'the vision, strategic objectives and spatial development strategy and policies in the Plan provide a positive and soundly based framework that will contribute to the delivery of sustainable development' *Insp 58*. The inspector's conclusions in relation to the sustainability appraisal (SA) of the Plan are typically routine: 'The SA results have fed into the development of the Plan along with technical work and a range of other evidence. ... Overall, I am satisfied that the Council's SA work is fit for purpose and provides a sufficiently robust high-level assessment, proportionate to Local plan preparation'.

80. This is not the place to review the technical ability of an SA process to target and achieve actual changes to unsustainable proposals within such as a local plan, to make sure they really effectively balance SD's 3 pillars, but FOE's experience is that this does not happen. There's no better example than, as noted in para.71, that the inspector has not tested whether the Plan is compliant with the requirement of NPPF 93 that the it 'should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions'. The assessment that the 2018

sustainability appraisal recorded is that: 'Overall the Climate Change policy recorded twelve positive impacts against the SA Objectives' and that 'There were no mitigation issues identified against the policy'. Testing for an objective to 'reduce the effect of traffic on the environment', it provides a positive score because 'a significant element of [the local plan] is encouraging sustainable travel which in turn would reduce traffic emissions, traffic growth and congestion'. But that assessment is qualitative, not quantitative, and it also demonstrates the level of superficiality of an SA exercise.

81. On the other hand, it's a matter of fact that the majority of the report is given over to an apparent demonstration as to why a large number of previously protected environmental sites should now be made available for development. So the huge environmental, social and economic disbenefits of inadequate decarbonisation have been pushed to the margins and instead been crowded out by giving overwhelming attention to a claimed interaction between housing growth and economic benefits, the case for which turns out to be deeply flawed.

82. Just two examples; there are many more. Is this a fair balance in between the 'economic' and 'environmental' pillars, with equal weight being given to disbenefits as well as claimed benefits? In FOE's judgement the inspector has failed to ensure that the application of sustainable development within the Calderdale local plan - the 'golden thread running through both plan-making and decision-taking' *NPPF 14* - has been demonstrably achieved.

83. In our evidence on climate we recommended that policy SD2 Sustainable Development *publication draft page 38pdf* should be amended to include in a priority position the words: 'All new development within Calderdale is expected to make a positive contribution to sustainable development by: 'shaping places in ways that contribute to radical reductions in greenhouse gas emissions, and support the transition to a low carbon future.' The inspector's response was peremptory: 'Policy SD2 sets out a series of sustainable principles but these are largely a repetition of the strategic objectives and are not intended to aid decision-makers. As such they are superfluous and not justified and should be deleted' *Insp 41* FOE does not believe the judgements made in that last sentence are correct. If it had been retained, policy SD2 could have been one of the ways to prevent the Calderdale's spatial and climate strategies going off in divergent directions.

Conclusions

84. In this briefing's pages councillors may have quickly found themselves lost in a maze of numbers and analyses about the basic underpinnings of the draft local plan, such that it no longer appears to make sense.

85. What Friends of the Earth has done is suggest that the Calderdale Plan is in fact built on quicksand, with all the resultant dangers. You appear to be walking on solid ground, and towards a welcoming mirage of 'more population, more jobs, and more houses'. But then, look again, and the vision of all those claimed benefits has disappeared. The local plan turns out to be a flawed analysis of the wrong problems therefore producing wrong solutions, which will never materialise.

86. Instead what remains are the **real** problems, still to be confronted: Calderdale's housing problem - unresolved! Town centres undermined by new development to be placed in unsustainable locations. Protected Green Belt sites to be handed over for the effective benefit only of developers. And above all an utterly inadequate response to climate change - in fact support for measures that could actually make it worse - permanently embedded until the 2030s.

87. Taken together **this is a disaster for Calderdale**. It's not 'nimbyism' if Friends of the Earth and other community and environmental groups have to point out all the structural and undisclosed failings in the local plan process that have led to this situation, about which communities should have been consulted but weren't.

88. Councillors have previously failed in their responsibility of adequately supervising the preparation of this local plan. They must now discharge their duty: to vote **not** to adopt it, or to approve it and bear the responsibility for all that follows.

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