

# Core Strategy Refined Issues and Options Consultation Feedback

August 2011





<b>1 Introduction</b>	<b>5</b>
<b>2 Awareness Raising</b>	<b>6</b>
<b>3 Consultation Methods</b>	<b>8</b>

## Documents

<b>4 Core Strategy</b>	<b>10</b>
Big Idea (Vision and role of places)	16
Objectives	22
Possible Approaches	24
Ten Areas	29
Elland/Greetland/Holywell Green/Stainland	31
Brighouse/Rastrick	36
Sowerby Bridge	39
Northowram/Shelf/Hipperholme	41
Halifax	45
Todmorden	47
Hebden Bridge	49
Mytholmroyd/Luddendenfoot	50
Ripponden/Rishworth/Barkisland	52
Protected Moorland Areas	53
<b>5 Objectives and Policy Options</b>	<b>54</b>

# Contents

SO1 - Sustainable Development .....	54
SO2 - Climate Change .....	55
SO3 - Economy and Enterprise .....	64
SO4 - Housing .....	70
SO5 - Green Infrastructure and the Natural Environment .....	76
SO6 - Historic Environment and Design .....	81
SO7 - Transport .....	83
SO8 - Communities and Narrowing the Gap .....	85
<b>6 Minerals and Waste Policy Options .....</b>	<b>87</b>
SO9 - Minerals .....	87
SO10 - Waste .....	95

## Events

<b>7 Young People .....</b>	<b>108</b>
Young Inspectors .....	108
Schools .....	109
<b>8 Planning Aid .....</b>	<b>115</b>
Tenants and Residents Association .....	115
Boothtown Residents .....	116
Illingworth Residents .....	117
Mixenden Residents .....	117

Sowerby Bridge Residents .....	118
Calderdale College .....	120
Over 50s Workshop .....	123
BME Network .....	126
<b>9 Public Information Sessions and other meetings .....</b>	<b>128</b>
Brighouse .....	128
Todmorden .....	128
Halifax .....	129
Hebden Bridge Joint Town and Parish Councils .....	130
Ward Forums .....	130
Calderdale Disability Forum .....	130
 <b>Workshops</b>	
<b>10 Workshops .....</b>	<b>131</b>
Elland/Greetland/Holywell Green/Stainland Workshop .....	131
Brighouse Workshop .....	132
Sowerby Bridge Workshop .....	132
Northowram/Shelf/Hipperholme Workshop .....	133
Halifax Workshop .....	134
Todmorden Workshop .....	134
Hebden Bridge Workshop .....	136

# Contents

Mytholmroyd/Luddendenfoot Workshop .....	136
Ripponden/Rishworth/Barkisland Workshop .....	137
Calderdale Wide Workshop .....	138
Workshop Summary .....	140
<b>11 Lessons Learnt .....</b>	<b>143</b>

## 1 Introduction

**1.1** This document provides a summary of the Core Strategy Refined Issues and Options Consultation which took place between 21st January 2011 and 26th May 2011.

**1.2** The consultation was undertaken in two parts; a general consultation between 21st January 2011 and 25th March 2011 and a series of 10 creative workshops which took place between 29th March 2011 and 26th May 2011.

**1.3** This document has been split into several different sections representing the different types of consultation undertaken. In addition summaries of the key messages emerging from the consultation and actions arising from the comments have been highlighted as follows;

**Box containing summary of key points.**

**Box containing key actions for consideration as the Core Strategy progresses.**

**1.4** Whilst this document captures most of the themes and issues raised not every comment is directly represented. Those issues and themes which do not have any direct relation to planning, or those which cannot be considered as part of the Core Strategy, have not been included. However all comments made including reports from workshops can be viewed on the Calderdale Council website [www.calderdale.gov.uk](http://www.calderdale.gov.uk).

Picture 1.1 Halifax Town Hall





# 6 Awareness Raising

## 2 Awareness Raising

2

Calderdale MBC - September 11 Refined Issues and Options Feedback

**2.1** Raising awareness of the consultation is important to ensure the public become engaged in the consultation process. The methods used to raise awareness included articles in the press, posters, letters and e-mails, notices in the press and on the Calderdale Council website and discussions with various groups.

Picture 2.1 Halifax Courier



Picture 2.2 Press Notice



Table 2.1 Awareness raising methods

Method	Details	Location
Press releases	Press releases and information were sent out through the Councils Corporate Communications Officer	The Halifax Courier, Todmorden News, Brighouse Echo and Hebden Bridge Times all ran articles on the

Method	Details	Location
		consultation.
Press adverts	Adverts were placed in the press announcing the consultation period, where to view documents and details of public information sessions.	Adverts were placed in Halifax Courier, Hebden Bridge Times, Brighouse Echo, Todmorden News, Valley Life Magazine and Huddersfield Examiner
Posters	Posters informing people of the consultation and how to get involved.	Posters were placed in; <ul style="list-style-type: none"> <li>Planning reception</li> <li>Libraries</li> <li>Customer 1<sup>st</sup></li> <li>Other Council buildings as appropriate</li> </ul>
Letters/e-mails	Letters and e-mails were sent informing people of the consultation.	Letters or emails were sent to; <ul style="list-style-type: none"> <li>All 1900+ registered on the LDF database.</li> <li>Letters sent through the schools pack</li> </ul>
LDF newsletter	Quarterly newsletter to provide general information on LDF work and consultation. First newsletter to go out prior to consultation commencing.	<ul style="list-style-type: none"> <li>All 1900+ registered on the LDF database.</li> </ul>
Calderdale website	Information provided on main page of Calderdale web-site	<ul style="list-style-type: none"> <li>Web-site</li> </ul>
E-Call	Council-wide email to provide staff and Councillors with a link to the consultation material and how to get involved.	<ul style="list-style-type: none"> <li>Council email system</li> </ul>



Method	Details	Location
Leaflets	Summary leaflets of the 10 different areas identified in the Core Strategy.	<ul style="list-style-type: none"> <li>Leaflets were placed in;</li> <li>• Planning reception</li> <li>• Libraries</li> <li>• Customer 1<sup>st</sup></li> <li>• Other Council buildings as appropriate</li> </ul>
Ward Forums	Item on ward forums to sign-post the public to the consultation.	<ul style="list-style-type: none"> <li>• Ward forum meetings</li> </ul>
Councillor Briefing Sessions	Two briefing sessions were held for Calderdale Councillors on 19th January 2011 to inform members about the consultation	<ul style="list-style-type: none"> <li>• Calderdale MBC Councillors</li> </ul>
Parish and Town Councils	Letters sent to all Parish and Town Councils informing them of the consultation and the offer of a visit.	<ul style="list-style-type: none"> <li>• Calderdale Parish and Town Councils</li> </ul>
Halifax Town Team	Briefing to Halifax Town Team on 13th January 2011	<ul style="list-style-type: none"> <li>• Halifax Town Team members</li> </ul>
Calderdale Disability Partnership	Briefing to the partnership on 19th August 2010 and 22nd March 2011	<ul style="list-style-type: none"> <li>• Calderdale Disability Partnership</li> </ul>
Housing and Environment Service	Presentation to Housing and Environment Service	<ul style="list-style-type: none"> <li>• Calderdale MBC Housing and Environment Service</li> </ul>

Picture 2.3 Consultation Event



## 3 Consultation Methods

3

Calderdale MBC - September 11 Refined Issues and Options Feedback

**3.1** A wide variety of techniques were used working in partnership with several organisations including Planning Aid, Schools and various groups and forums. The methods included on-line and hard copy consultation documents, leaflets, workshops and public information sessions.

**3.2** The three documents generated over 1250 direct comments from over 170 individuals, agents, groups or organisations. These comments were made either on-line, by e-mail or by letter.

**Table 3.1 Comments on the documents**

Document	Total Comments	Consultees
Core Strategy Refined Issues and Options	643	117
Minerals and Waste Objectives and Policy Options	165	28
Objectives and Policy Options	445	60

**3.3** In addition in excess of 800 individuals, groups and organisations attended various events and workshops. The comments and questions from these events have been considered as part of the feedback to the consultation.

**Table 3.2 Methods of consultation used**

Event	Method	Date	No. of attendees
Halifax Civic Society	Discussion	7/2/11	9
Planning Aid: Sowerby Bridge Residents	Workshop	14/2/11	13

Event	Method	Date	No. of attendees
Brighouse Public Information Session	Presentation and discussion	16/2/11	46
Planning Aid: Illingworth Residents	Workshop	16/2/11	10
Ripponden Parish Council Meeting	Discussion	17/2/11	12
Planning Aid: Mixenden Residents	Workshop	23/2/11	19
Planning Aid: Tenants and Residents Associations	Workshop	24/2/11	14
Parkinson Lane School Council	Discussion	28/2/11	15
Rastrick High School Open Day	Discussion	1/3/11	Unknown
Todmorden Public Information Session	Presentation and discussion	1/3/11	37
Planning Aid: Calderdale College	Workshop	2/3/11	39
Planning Aid: Ovenden & Boothtown Residents	Workshop	2/3/11	9
Hebden Royd Town Council	Discussion	2/3/11	Unknown
Ling Bob School Council	Discussion	3/3/11	8
Ling Bob School class discussions	Discussions	Various	Over 120

Event	Method	Date	No. of attendees
Planning Aid: Calderdale College (2)	Workshop	4/3/11	24
Hebden Bridge Joint Parish and Town Councils Public Information Session	Presentation and discussion	8/3/11	36
United Brighouse	Discussion	8/3/11	Unknown
Planning Aid: BME Network	Workshop	9/3/11	18
Halifax Public Information Session	Presentation and discussion	9/3/11	19
Planning Aid: Over 50s	Workshop	10/3/11	13
White Hill School	Discussion and workshop	14/3/11	11
Castle Hill School	Discussion and workshop	15/3/11	10
Holywell Green School	Discussion and workshop	21/3/11	7
Northowram and Shibden Valley Village Societies	Discussion	21/3/11	8
Calderdale Disability Partnership	Presentation and discussion	22/3/11	Unknown
Scout Road School	Discussion and workshop	25/3/11	29
Calderdale Young Inspectors	Various	Various	91

Event	Method	Date	No. of attendees
Rastrick High School Student Leadership	Discussion	Unknown	Unknown
Calderdale Disabled Youth Forum	Discussion	Unknown	12
Elland, Greetland, Holywell Green & Stainland Area Workshop	Creative workshop	29/3/11	22
Brighouse & Rastrick Area Workshop	Creative workshop	31/3/11	17
Sowerby Bridge Area Workshop	Creative workshop	6/4/11	14
Northowram, Shelf & Hipperholme Area Workshop	Creative workshop	8/4/11	14
Halifax Area Workshop	Creative workshop	11/4/11	11
Todmorden Area Workshop	Creative workshop	15/4/11	19
Hebden Bridge Area Workshop	Creative workshop	3/5/11	18
Mytholmroyd & Luddendenfoot Area Workshop	Creative workshop	10/5/11	13
Ripponden, Rishworth & Barkisland Area Workshop	Creative workshop	11/5/11	11
Calderdale Wide Workshop	Creative workshop	26/5/11	24

## 4 Core Strategy

**4.1** The main document available for consultation was the 'Core Strategy Refined Issues and Options' document. This looked at the big issues within Calderdale including a vision of the future, possible approaches to locating development and the role of different parts of the district.



**4.2** There were 643 separate comments made directly to this document from a range of individuals, groups and agents. The comments were wide-ranging with many conflicting views. The remainder of this chapter looks at the main themes and considerations for the Core Strategy from the comments received to this document.

### Section 1 - Setting the Scene

**4.3** This section set the background to the Local Development Framework (LDF) and the process for preparing it including the role of national and regional planning guidance and Sustainability Appraisal. It

also provided a snapshot of the district in relation to its demography, housing, deprivation and health issues, economy, transport, climate change issues, heritage, minerals and waste matters and infrastructure planning. Whilst this was intended to be a background section representations were received in relation to the topics covered and these are summarised below.

### General Comments

**4.4** A number of comments related to the overall structure of the consultation documents suggesting that a single document would have been easier to navigate. Overarching comments were also made about the Core Strategy in relation to particular issues.

### Core Strategy Key Themes 1

- Demonstrate mechanisms used to fulfil duty to cooperate and move to presumption in favour of sustainable development;
- More information should be provided on any green belt changes required;
- Concerns Council may reduce housing numbers. Should not be reducing housing requirement but supporting housing and economic growth;
- Role of LDFs is to enable, not restrict, growth;
- Opportunities to collaborate with Kirklees should be pursued but not to reduce housing requirement;
- Copley Valley scheme should be dropped (as subject to flooding) and replaced by Nature Reserve;
- Who controls how and when documents can be changed and will there be public consultation?
- Role of town centres fundamental;
- Welcome recognition of importance of landscape as part of attractiveness of district and encouragement for tourism;
- Other than land filling, methods of dealing with waste should be within urban areas and not the countryside.

### Evidence

**4.5** Comments centred around the need to present evidence early in accordance with the front loading approach and the fact the Strategic Housing Market Assessment (SHMA) was not complete at the time of consultation. Reference was also made to the Strategic Housing Land Availability Assessment (SHLAA) although this was available, the annual review was being completed at the time of consultation. The evidence needs to be current and some organisations such as the Highways Agency will assist in updating evidence using their transport models.

## Core Strategy Key Themes 2

- Frontloading approach and various advice on LDF preparation requires early production of evidence;
- Some of evidence prepared some time ago when economic climate different;
- Should have SHMA and SHLAA available when consulting;
- Calderdale Traffic Model Forecasting Report not on website or electronically accessible;
- Transport study shows that whilst areas like Hipperholme are at capacity further development will not significantly increase this problem and this is a cause for concern;
- Highways Agency will use their models to illustrate impact of proposed development.

## Key Actions 1

- Ensure evidence kept up-to-date;
- Ensure all evidence completed;
- Where practicable ensure evidence on website (technical difficulties occasionally preclude this);
- Utilise organisations such as the Highways Agency to provide relevant evidence.

## National and Regional Planning Policy and Sustainability Appraisal

**4.6** A number of representations re-iterated both national and regional planning guidance along with more recent ministerial statements inferring that if the Council did not adhere to these the Core Strategy would not be found sound at examination. Views were also expressed about the current status of the Regional Spatial Strategy (RSS) and how the Council should respond. Many of the comments in relation to the RSS centred around

concerns that a new housing requirement figure may be lower than that in RSS with references to approaches being undertaken in surrounding districts. Issues around joint working with neighbouring authorities also featured, particularly in relation to housing requirement figures. Support was expressed that Sustainability Appraisal of the Core Strategy was to be undertaken.

## Core Strategy Key Themes 3

### National Planning Guidance

- National planning guidance and recent changes summarised to illustrate what the Council must do;
- Reflect updates to Planning Policy Statements;
- Joint working must be demonstrated.

### Regional Planning Guidance

- Review of housing targets welcomed;
- RSS approach for housing numbers and core approach supported but any change must be based on sound and robust evidence and take account of PPS3 and the Planning Officers Society advice note (provides advice on how to proceed in relation to RSS at the current time);
- Coalition Government wants an increase in housing according to what Ministers are saying and reducing housing numbers is therefore wrong approach;
- The RSS Update indicated that the housing requirement figure would increase;
- RSS remains an important document forming basis for housing and employment requirements. This should be updated with latest ONS forecasts;
- Would like opportunity to comment on future methodology for arriving at housing requirement figure;



- Latent housing demand currently due to recession but this undersupply will need to be compensated for in future, particularly if pressures of affordable housing are to be reduced;
- Must not go it alone but make any changes to housing numbers in conjunction with other local authorities in Leeds City Region;
- Concern over some local authorities seeking to reduce housing requirement figures with implications for affordable housing and economic growth;
- Duty to co-operate in Localism Bill not met and therefore Core Strategies in Leeds City Region could lack coherence and be unsound;
- RSS requires Calderdale to concentrate growth in east in settlements such as Brighouse ;
- Strengthen references to growth in Core Strategy bearing in mind RSS and new PPS4;
- Support importance of liaising with Leeds City Region and Manchester City Region Local Enterprise Partnerships and dealing with issues on regional and cross-boundary level;
- Strategic Road Network linking Calderdale to Leeds and Manchester congested and any increase in commuting should be catered for in a sustainable way through spatial planning and investment in public transport routes.

## Sustainability Appraisal

- Trees lost through development should be replaced;
- Publicly owned greenspaces should be maintained and enhanced;
- Developing on flood plain between Sowerby Bridge and Copley Valley not in accordance with objectives of sustainable development.

## Key Actions 2

- In determining a new housing requirement figure ensure that this is adequately justified and tested and meets the requirements of current planning guidance;
- Clearly undertake and demonstrate joint working both with other local authorities in the Leeds City Region but also with those in the Manchester City Region (including with the respective Local Enterprise Partnerships);
- Ensure information relating to planning policy advice is kept up-to-date;
- Undertake Sustainability Appraisal of the Core Strategy (statutory requirement).

## Snapshot of Calderdale

**4.7** This section provided background factual information about the district. Comments were received both specifically in relation to this information and also to issues under the same headings, particularly in relation to housing and transportation matters.

## Demographic and Housing Issues

**4.8** Concern was expressed about the reliability of projections as a sound basis for planning housing growth. Other comments concerned the types of houses to be provided in relation to the districts needs with varying views put forward. Some who made comments supported housing growth including the New Growth Point (NGP) whilst others objected for a number of reasons, including the associated traffic growth and congestion making housing growth not sustainable. Need as opposed to desire is what should be planned for in terms of housing provision. Other issues mentioned included the New Homes Bonus and Community Infrastructure Levy and the need to take advantage of these opportunities to obtain additional funding. Empty homes should be used to reduce the need to build. Family

homes rather than apartments and town houses should be provided and the consequential increase in land take planned for. Again the housing requirement was mentioned with concerns expressed that the review of the RSS figure may lead to a lower housing requirement figure as appears to be the case in neighbouring authorities.

### Core Strategy Key Themes 4

- Base housing targets on actual population change and do not be so reliant on projections;
- Housing need should be met rather than individual desires;
- Not currently clear what housing requirement will be;
- Support approach to follow RSS and New Growth Point and need to plan now for increase in housing requirement for next 20 to 25 years;
- Providing more dwellings than households supported as provides choice and assists affordability;
- Intention to re-use long term empty homes welcomed - details of how this is to be achieved and its impact on housing figures would strengthen Core Strategy;
- Already consequences of unrestrained housebuilding being seen and New Growth Point proposal not realistic nor is not sustainable;
- A58 congestion - cannot resolve without destroying what is there - will not be sufficient funding to compensate for what is lost;
- Housing targets unrealistic given infrastructure and topographical constraints (report by EKOS for Leeds City Region quoted to illustrate point);
- Advantage should be taken of initiatives such as New Homes Bonus and Community Infrastructure Levy but latter will have to be set at viable level and development be on a scale to obtain sufficient funding for infrastructure;

- Need to move away from smaller dwellings such as flats and town houses to more appropriate mix including demand for family homes with associated implications for land take;
- Demographics demonstrate acres of large family houses which housebuilders provide are not needed. Small affordable social housing should be provided in sustainable locations whilst protecting countryside;
- Need to include policies for older persons housing including Lifetime Homes and Sheltered Housing - can predict numbers in this group more accurately than other age groups;
- Provide bungalows for elderly and thereby free up housing;
- Measures should be in place to ensure developers provide the affordable housing agreed when planning applications are determined;
- Urban sprawl over green fields will create new areas of deprivation.

### Key Actions 3

- When determining the housing requirement reflect the types of dwellings required;
- Explain how the strategy will bring long term empty homes back into use;
- Determine the future of the New Growth Point;
- Progress work on the Community Infrastructure Levy.

### Economic Issues

**4.9** A number of comments related to the need to balance housing and employment in order to reduce the amount of out commuting from the district, particularly given the sustainability implications. The negative impact of supermarkets on the local economy was also recognised.



## Core Strategy Key Themes 5

- Balance between housing and employment important to reduce out commuting and address consequential sustainability and social exclusion issues. Need to provide new housing close to employment areas in district and also in locations close to adjoining local authorities;
- A number of Todmorden residents work in Burnley and beyond;
- More employment opportunities supported as will reduce traffic congestion and CO2 levels;
- Manufacturing role to play but needs support whilst distribution will not provide many jobs
- Incentives should be offered to attract employers to the district;
- If the distribution, hotel and restaurant sector is to be the fastest growth sector then it needs unencumbered access via M62 and retention of a pleasant and attractive environment, this will not be helped if the green fields around Junction 25 are developed;
- Supermarkets take money out of the local economy and also cause net job losses, several quoted studies;
- Support given for additional convenience and comparison floorspace.

## Key Actions 4

- Use the Core Strategy to provide assistance to employers to increase the number of jobs in the district both to reduce out commuting and to improve the local economy;
- Where employment opportunities in neighbouring districts provide employment for Calderdale residents continue to identify these.

## Transport Issues

**4.10** Of particular concern were issues around congestion including the health effects. A more holistic approach to transport was advocated reflecting various modes. Also the capacity of the M62 is seen as a major issue, particularly if developments go ahead in both Calderdale and Kirklees although the Highways Agency state that works are proposed to increase its capacity.

## Core Strategy Key Themes 6

- Take a holistic approach to transport;
- Narrow valleys limit opportunities for commuting improvements particularly for private car, limited parking at stations;
- Need for separate cycle routes;
- Promote walking;
- Role of waterway and canal networks should be recognised including the role of towpaths for pedestrians and cyclists;
- Station at Hipperholme/Lightcliffe supported but will need parking and unlikely to reduce local congestion, buses better if frequent and not too expensive;
- More local jobs and facilities will aid reducing congestion;
- Congestion is already an issue on the M62 and will be made worse by developments in the Brighouse area as will congestion in Brighouse itself;
- Assessment of conditions on M62 basically correct. Managed motorway proposals are to be introduced with construction commencing by 2015. Will improve capacity to less than 85% of capacity. Demand management required in proposals to address trip generation onto the Strategic Road Network and at the interface with local primary roads. Locations where capacity constraints on local primary road network have knock on effects on operation of motorway and its junctions;

- Locations of particular concern to Highways Agency in Table 1.11 include Ainley Top, Brighouse Town Centre and Cooper Bridge where traffic queueing back to the motorway and to get off the motorway is expected to become a problem, particularly if development proposals in Calderdale and Kirklees go ahead. Also Junction 26 is expected to have capacity problems and any additional development in Hipperholme and eastern Calderdale will exacerbate this;
- Take account of current levels of congestion (e.g. Shibden Valley);
- Health risks from congestion particularly in narrow valleys such as Hebden Bridge should not be ignored.

## Key Actions 5

- Continue to develop a holistic transport policy ensuring the Core Strategy promotes alternatives to the private car including facilitating the provision of new rail stations;
- Use spatial planning to reduce the need to travel.

## Climate Change Issues

**4.11** A number of points were made specifically in relation to climate change and covering initiatives already being undertaken by the Council or included in work on the Core Strategy.

## Core Strategy Key Themes 7

- If trees are to be removed such actions need adequate consideration;

- Look at energy efficiency of existing housing stock and particularly where not suitable for cavity wall insulation;
- Flood risk needs full and proper consideration in the preferred option, PPS25 must be fully complied with and sequential approach applied. SFRA should be updated to include most up to date information;
- Level 2 SFRAs should be undertaken in Sowerby Bridge and Halifax along with Surface Water Management Plans in Brighouse and Sowerby Bridge;
- Robust network of ecological habitats needed that can adapt to change and loss brought about by climate change;
- Sustainable modes of transport will not only ameliorate effects of climate change but also reduce traffic congestion;
- Energy storage using heat from composting/waste incineration to increase efficiency should be explored.

## Key Actions 6

- Ensure SFRA up-to-date and extend evidence on surface water management;
- Ensure potential to improve energy efficiency of all buildings is reflected in Core Strategy;
- Ensure opportunities to further increase and improve natural habitats are reflected in Core Strategy;

## Heritage

**4.12** A few comments were received in relation to the background section on heritage. One suggested Grade II listed buildings be allowed to benefit from renewable energy and energy efficiency measures as these are the buildings that are difficult and expensive to heat. English Heritage are keen that the Council seek to preserve class II archaeological sites. Others

consider that Table 1.12 should include conservation areas.

**Key Actions 7**

- Ensure preservation of Class II archaeological sites covered in Core Strategy;
- Add conservation areas to list of heritage assets;
- Seek to address issues of energy efficiency and renewable energy in respect of Grade II Listed Buildings.

Infrastructure Planning

**4.13** A limited number of responses addressed the Infrastructure Delivery Plan (IDP) but useful factual information was received from the National Grid, the Civil Aviation Authority and the Highways Agency. The latter expressed their wish to be involved in the IDP, particularly in relation to the Strategic Road Network and its junctions with the local primary road network and in assessing the feasibility of any proposals in the Core Strategy.

**Core Strategy Key Themes 8**

- List of National Grid assets provided (electricity and gas);
- Consider needs of aerodromes in relation to new development including masts;
- Highways Agency wish to be involved in IDP.

**Key Actions 8**

- Engage the relevant organisations in the preparation of the IDP and proposals included in the Core Strategy.

Big Idea (Vision and role of places)

The Proposed Vision

**4.14** This section of the document explained the background to the proposed vision including the influence of other strategies. It then set out a proposed vision for Calderdale and asked for comments on this vision.

**4.15** There was general support for the vision although some of this was qualified and subject to amendments or a change in emphasis. Some comments referred more to the implementation of the vision as opposed to the actual vision itself. Concerns were expressed that the various elements of the vision were incompatible and tensions between these would make it difficult to deliver the vision, particularly if the scale of change was great. The potential outcomes from the various variables therefore need modelling to ascertain the scale of change and the interactions between the variables.

**4.16** One contributor raised a series of questions about exactly what the Local Strategic Partnership was and how it was constituted given that the consultation document refers to the Sustainable Community Strategy it produced.

**4.17** In relation to other Council and Partner Strategies one contributor questioned why the Leeds City Region should have influence (given the localism agenda initiated by the Coalition Government) whilst another supported the approach of drawing on other Council and Partner Strategies.

**4.18** The comments suggested amendments and additions to the proposed vision and are summarised below with reference to the relevant bullet point (BP) where applicable:

**Core Strategy Key Themes 9**

**General Comments on Vision**

- Must be grounded in reality and not an unrealisable wish list;
- Technology moves on quickly and technological infrastructure such as broadband needed as many people now work from home, yet 'black spots' for broadband access in Upper Valley;
- Reflect importance of Elland and strategic scale of development proposed in the vision;
- Vision too detailed, should be clear, shorter and have a clear spatial focus. Some of the bullets should instead be included in policy;
- Vision too generic - needs central core belief such as commitment to localism, e.g. local needs for employment and training opportunities for working population in Calderdale are a priority;
- Validity of SCS vision now questioned given approach of Coalition Government of local strategies for growth led by private sector - without a Local Strategy Statement Core Strategy vision should be consistent with intentions of Local Enterprise Partnership;
- Strong links with other strategies essential;
- Given speed at which shape of services is changing vision needs to be as up-to-date as possible at the point it is finalised;
- Acknowledge importance of inland waterway and canal network (transport, recreational, ecological, heritage and tourism asset);
- In 2026 Calderdale will be a place that has retail developments of a scale which do not create significant adverse effects (e.g. supermarkets adding to traffic flows and congestion and causing decline of existing facilities).

### Coherence of Vision

- If scale of change relatively small may be possible to encompass and balance any contrary tensions in interactions between individual trends;
- Given size of e.g. housing numbers it appears on evidence currently available that those aspects of vision relating to

sustainability and protecting the environmental character of the district (BP10) and open space (BP12) are not deliverable;

- Elements of vision supported (e.g. BP1, 2 and 4) but all elements of the vision taken together suggest that there are incompatibilities which will prevent its realisation.

### BP2 Climate Change

- Re-word to either '**Has responded to the causes of climate change**' or '**Has responded to the causes and adapted to the impacts of climate change**'
- In 2026 Calderdale will be a place that generates renewable energy without degenerating the environment.

### BP3 Housing

- Meet housing needs across district including urban and rural;
- Developing more homes in appropriate locations supported;
- Reference to incentives should be omitted as this details a means by which development may be achieved and is not therefore a vision;
- Should refer to community and be clear providing houses for Calderdale residents and not Leeds City Region;
- Reference to increasing and diversifying the community is superfluous unless the Council wants to commit Calderdale to increasing and diversifying the community;
- Establish need for homes and types required in appropriate locations;
- Could read: '**Build homes appropriate to the needs of the community**';
- Refer to incentives (not incentive) as there are likely to be others in the future.

### BP4 Transportation

- No mention of objectives in Local Transport Plan 3;

- Public transport improvements in Upper Valley including more parking at rail stations;
- Existing subsidy to bus service for the hilltops needs preserving.

## BP6 Benefits to Community

- Should read: '**Ensure that new developments are to the benefit of the whole community**'
- Benefits for the community should be given priority over any development, the wishes of the community should come first;
- Quality of life for local residents should always predominate;
- Assumption communities may want to benefit from incentives may be incorrect as they may wish homes not to be built rather than accept Government Funds;
- Community referendum to be held for major developments;
- Community needs and desires as perceived by the community to take priority.

## BP7 Conserving and preserving towns and settlements

- Too negative suggesting no change will take place whereas places should be encouraged to evolve and adapt.

## BP8 Economy/Role of centres

- Vision for Todmorden unrealistic as growth restricted by topography, road infrastructure, unstable hillsides, flooding in valley, limitations to drinking water supply and sewerage capacity;
- Focusing more residential development in Todmorden not sustainable given its relative separation from other settlements and lack of employment opportunities;
- Objection to reference to enhanced role of Todmorden as this pre-empts the outcome of this consultation and this option may not be taken forward;

- Proposed enhanced role of Halifax town centre supported but any changes need to be carefully managed to avoid negative impacts;
- Proposed role of town centres supported;
- Further emphasis on growth;
- Reference to Leeds City Region should be removed as this indicates subservience to the Leeds City Region whereas the Coalition Government has signalled its intention for decision making to be more democratic and local to the communities they effect.

## BP9 Infrastructure

- All development to be in place to support a development before it commences.

## BP11 Protecting natural resources

- Natural England welcomed references to the natural environment but consider emphasis should be on enhancement of natural environment as well as protection. Re-word: 'Has innovative ways of protecting **and enhancing** natural resources .....natural habitat and biodiversity, views and our landscape'
- Reflect need to protect hilltops from invasive development which would change face of our environment.

## BP12 Open Space/Green Infrastructure

- Re-word to show emphasis is on protection of open spaces and not secondary to delivering major developments: 'Protects open space **as part of the process of delivering major development projects** and provides accessible green infrastructure where there is deficiency'



- Re-word: 'Protects **and enhances** open space and Green Infrastructure and provides a net gain in Green Infrastructure where there is a deficiency.....'
- Support for parts of vision relating to conservation of environmental assets and reinforcement of the distinctive character of settlements and landscapes.

### BP13 Cultural heritage

- Greater emphasis on conserving, preserving and enhancing distinctive local historic environment (including all its assets) for future generations.

### BP14 Standards

- In 2026 Calderdale will be a place with administrative offices spread around its territory, and which holds council and committee meetings in various locations, especially when dealing with matters important to a particular locality.

### BP15 Inequality and deprivation

- Re-word to emphasise not all change is of benefit and any change should be of benefit to the community and if not it should be resisted: ***'Recognises and embraces change which benefits the community, to ensure that economic and social change supports the development of a diverse, balanced economy addressing inequality and deprivation across the district'***
- A list of the things of concern to young people was submitted, presumably to be reflected in the vision;
- BP15 should give explicit mention to the 'Narrowing the Gap' agenda;
- Include education and training provision, health and social care, social cohesion/integration.

### Key Actions 9

- Re-write the Vision taking account of the comments received making it more focused and coherent and adding in additional elements suggested where appropriate and relevant.
- In re-writing the Vision reflect the changing priorities of the Coalition Government and the current relevance of other quoted visions.

### The role of our places

**4.19** This section explained the role and function of the settlements in Calderdale based on the Settlement Hierarchy Study. Question 2 asked whether or not people agreed with the roles of the different places and whether the roles of any particular places should change.

**4.20** Views varied as to whether any changes were required to the proposed roles for settlements across the district. The Clifton Action Group questioned the rationale behind proposing Brighouse as a Principal Town and the implications of this designation. They suggest this designation does not accord with the vision of the people of Brighouse. The need for intervention was questioned and organic growth suggested instead. Others support the idea of Brighouse as a Principal Town and suggest that the role of Brighouse be explained in terms of not only of how it serves Calderdale but also its function for the adjoining parts of Kirklees in terms of jobs and services. Others whilst supporting the role advocated for Brighouse also emphasise the role of Hipperholme within this area through the re-allocation of some employment sites.

**4.21** It was considered unclear as to whether provision of new retail and employment is to be directed towards Brighouse town or the Brighouse area including the smaller centres within it. Clarity is required in relation to the position of the smaller centres in the retail hierarchy in accordance with PPS4. Promoting centres to function at a higher level in the hierarchy

will enable growth to be accommodated and avoid an over concentration of facilities in Brighouse. It was suggested the former Clifton Mills site in Bailiff Bridge could beneficially accommodate a mixed retail and employment development to the benefit of other facilities already here if this were defined as a local centre. Bullet Point 3 for Brighouse in Table 2.2 should be re-worded as follows (bold italics are suggested additions).

'Significant growth in commercial floorspace and improvements in the scale and type of leisure retail and cultural facilities and services within Brighouse Town Centre, **and growth in retail and community facilities and services within the defined local centres of Bailiff Bridge, Hipperholme, Hove Edge, Lightcliffe and Rastrick.**'

**4.22** Due to some settlements in the Settlement Hierarchy being amalgamated it was considered difficult to determine how development will be aimed at the most sustainable centres. It was suggested clarity on the roles of areas would be enhanced if all settlements were listed in full for each tier.

**4.23** Natural England consider Table 2.2 could be improved if the role and function of existing open space and green infrastructure assets were considered as this would inform decision making about open space and help target particular areas for improvements. Green Infrastructure should be an integral part of the functions of settlements and should also be considered alongside traditional infrastructure and facilities to ensure residents have access to multi-functional open space close to where they live.

## Core Strategy Key Themes 10

### General Comments

- Object to Hebden Bridge and Todmorden being in different tiers. Both are equivalent Local Centres and Todmorden is equally deserving of conservation and preservation as Hebden Bridge.

- Service centres should be distributed across Calderdale based on the natural groupings of communities;
- Role and function of existing open space and green infrastructure assets should be included in Table 2.2 as this would inform decision making about open space and help target particular areas for improvements;
- Clarity required in relation to position of smaller centres in the retail hierarchy;
- Improved public transport with real quality public transport options.

### Tier 1 - Sub-Regional Town

- Support Halifax as primary focus for cultural activities. Glossary should contain description of term cultural facilities. Strategy should state that planning permission involving loss of buildings for community and cultural uses should only be granted where the applicant can demonstrate no need for their existing use or a replacement facility is to be provided elsewhere.

### Tier 2 - Principal Town

- Support role and function of settlements and agree with Hipperholme and Lightcliffe being within geographical area of Brighouse. Highlight opportunities in Hipperholme through re-allocation of existing employment opportunities in enhancing Brighouse's role as a principal town;
- Hipperholme should be a Local Centre (as opposed to being subsumed under Brighouse) being freestanding, having a fairly wide range of shops and the largest centre in the Hipperholme/Northowram/Shelf sub area.



**Tier 3 - Local Town**

- Growth of Elland supported and should not be in the same tier as Todmorden and Sowerby Bridge as it has potential for an enhanced role. It should be given this enhanced role.
- Stating role is to accommodate housing development to meet needs of towns and surrounding lower order settlements too limited - local towns need to have their role and function amended to allow them to help meet wider strategy objectives.
- Role of local towns in relation to growth needs to be clearer as these will play a role in accommodating levels of development proposed.
- Objection to concept that Todmorden's function is to service Hebden Bridge.
- Transport links to higher order centres from Todmorden are not good. Many rail users in Hebden Bridge drive to Todmorden rail station as there is more car parking here.
- Enhancing role of Todmorden may reduce the status of Hebden Bridge and in time if more services and facilities were to be located in Todmorden this would be a major inconvenience for people living in other parts of the Upper Valley.
- Hebden Bridge and Todmorden should be protected for their characteristics of outstanding natural beauty and development should be sensitive to the characteristics of each area.

**Tier 4 - Local Centres**

- Housing growth may be better located in local centres which may be more sustainable than attempting to accommodate all growth in higher order centres. This would provide for a proper range and balance of sites across the district;
- Stainland and Holywell Green not correctly classified as amalgamated and settlement scores added together. Need to be classified correctly to ensure matters including identity and sustainability recognised;

- Stainland and Holywell Green - re-classify as Neighbourhood/Small Rural Centres as individually this reflects their real sustainability levels. Services in Stainland reduced over last 10 years. Together and classed as a Local Centre they are in the same category as Hebden Bridge but do not have the same level of facilities and services. The sustainability grid square analysis for Stainland and Holywell Green is below the level of those in other local centres;
- Support identification of Ripponden and Rishworth as a Local Centre;
- Northowram only has a few shops, is a lower order centre and should not be a Local Centre but a Neighbourhood /Small Rural Centre.

**Tier 5 - Neighbourhood/Small Rural Centres**

- Role and function too tightly drawn and does not acknowledge types of small scale development appropriate to this tier of settlement (e.g. small scale residential or economic development proposals involving change of use and infill).

**Key Actions 10**

- Re-assess role and function of settlements to determine whether they should change category and specifically Elland, Hebden Bridge and Todmorden;
- List all settlements under higher order settlements and their roles;
- Separate out smaller settlements where amalgamated.

**Schematic Diagram of the 10 Calderdale LDF Areas**

**4.24** This section introduced the idea of sub-dividing Calderdale into 10 sub areas and presented these as a schematic diagram Map 4.1 'Schematic

diagram of the Calderdale LDF areas'. This section is closely linked to the Map 4.2 'The 10 areas'. The comments are therefore included together in that part of this document.

**Map 4.1 Schematic diagram of the Calderdale LDF areas**



## Objectives

**4.25** This section introduced the Strategic Objectives and asked for comments on the objectives including whether there were others that should be added.

**4.26** The detail of the objectives and their sub-objectives is contained in the Strategic Objectives and Policy Options consultation document published at the same time as the Refined Issues and Options Consultation document.

**4.27** Generally the Strategic Objectives were supported whilst a few more detailed comments were made regarding specific objectives. Those agencies responsible for particular matters (e.g. Environment Agency) generally supported the relevant objectives. Regarding SO4 many of the same comments to housing issues, particularly the housing requirement figure, were made as to those made in respect of housing issues in other parts of the document. Further comments made specifically in relation to the Strategic Objectives and Policy Options consultation document are covered in 5 'Objectives and Policy Options'.

## Core Strategy Key Themes 11

### General

- Consider updating Objectives to reflect Coalition Government's emerging changes to planning system including to deliver economic growth, reflection of presumption in favour of sustainable development and approach to general power of competence and duty to co-operate;
- Support sustainable development;
- Greater acknowledgement of role inland waterways can play in meeting objectives;
- Make objectives more locally distinctive.

### SO1 Sustainable Development

- Review once Government published its definition of sustainable development;
- Principles of sustainable development should be applied across all activities of spatial planning and not only to new or refurbished development but also include environmental assets. Add to end of Objective 6- '**....and in the management of its environmental assets**'.

### SO3 Economy and Enterprise

- Support re-allocation of surplus employment allocations for housing or other uses which accords with RSS, Government's intentions to increase housing supply and guidance in PPS4;
- Support need for additional retail floorspace as identified in the Retail Study and this should be reflected in areas of proven need and expected significant growth such as Hipperholme (identified as a Growth Point);
- Emphasise local elements such as enhanced training so local workforce has skills and knowledge needed;
- Promote more businesses of different types and sizes in all parts of Calderdale including urban and rural areas (will also help in meeting targets for reduction of carbon dioxide and other greenhouse gases);
- Too introverted and does not reflect RSS and PPS4 - needs to reflect role of Calderdale in wider City Region economy.

### SO4 Housing

- Some recognition could be made of the need to deliver affordable housing;
- No reliance should be placed on RSS for determining the level of housing required;
- Some conflict between delivering RSS housing requirement and intention to reconsider the requirement;
- Refer to NGP status and responsibility to deliver 20% above the RSS requirement between 2011 and 2016;
- Support approach of providing for higher number than requirement particularly as Hipperholme with its Growth Point status will enable this;
- Amend SO4 to reflect situation where RSS does not form part of development plan: 'To meet the housing needs of all by delivering the RSS **[or an alternative figure arrived at as a result of a thorough methodological assessment and which**

**is tested and found to be sound]** housing requirement through the provision of a range of good quality dwellings.....'

- Will have to be amended given Council intends to review housing requirement;
- Should also reflect future Government housing initiatives;
- Reference to 'sustainable building methods' should be changed to 'appropriate building standards';
- RSS target unrealistic - residential growth in Upper Valley should be organic;
- Remove reference to 'delivering the RSS housing requirement' as cannot base target on one already resolved to abandon and currently unrealistic yet adherence will result in serious and irreparable damage to district. Would read: 'To meet the housing needs of all... **[Delete]**...through the provision of a range of good quality dwellings.....'

### SO5 Green Infrastructure and the Natural Environment

- Recognition and preservation be given to Wildlife Corridors (aid joining of green infrastructure network, help preserve biodiversity habitats and preserve biodiversity and highlight presence of protected species);
- Targets for this objective incompatible with proposed housing expansion in SO4.

### SO6 Historic Environment and Design

- Refurbished as well as new development should have intention of retaining and strengthening district's distinctive heritage;
- Reflect advancing understanding of significance of heritage assets (PPS5 Policy 12.3);
- Amend to more closely reflect advice in PPS1 (promotion and reinforcement of local distinctiveness), language of PPS5 and acknowledge positive role heritage assets can play in assisting regeneration and delivery of other objectives of Core Strategy by re-wording: '**To conserve the District's heritage assets and**

*maximise the contribution which they can make towards the delivery of the wider economic and social objectives of the community and to ensure that new development through high-quality inclusive design, helps to improve and reinforce the local character and identity of Calderdale's communities'*

- Heritage assets in Todmorden being demolished for a supermarket with inference being need joined up approach;
- Green Infrastructure and the natural environment should be 2 objectives in order to clearly promote all aspects of the natural environment. Would assist in protecting natural assets (eg protecting and designating nature conservation sites);
- Need reference to matters such as local distinctiveness and to setting a positive framework for the protection and enhancement of the landscape character of the district.

## SO7 Transport

- Amend to include reference to harmful effects transportation can have: '.....which reduces the need to travel **and minimises the adverse effects upon the environment and communities'**

## SO8 Communities and Narrowing the Gap

- Amend wording to make clearer - does it mean community and cultural facilities and opportunities will be improved for the benefit of all residents and visitors?

## SO9 Minerals

- Calderdale's role is to contribute to the national supply of minerals and not to be self sufficient in minerals. Amend to read: '**To contribute towards** a sufficient and sustainable supply of minerals.....'

## SO10 Waste

- Seek to reduce amounts of construction and demolition waste by encouraging re-use or adaptation of existing buildings. Only allow demolition where not most sustainable approach or impracticable. Amend Objective: '**To assist in reducing the amount of waste generated** and to plan for sufficient waste management facilities.....'

## Key Actions 11

- Ensure the Strategic Objectives reflect the Coalition Government's emerging changes to the planning system;
- Re-assess the Strategic Objectives to ensure they are locally distinctive where appropriate;
- Re-asses and amend the Strategic Objectives taking into account the comments above.

## Possible Approaches

**4.28** Four approaches to the distribution of new development were suggested in the Core Strategy briefly these were;

1. **Focus on Eastern Calderdale** - Halifax, Brighouse, Elland and Northowram/Shelf would be the focus for development and infrastructure improvements. Eastern Calderdale's proximity to the M62 would be used to encourage business growth, there would be limited growth elsewhere.
2. **Enhance the role of Todmorden** - Whilst Halifax and Brighouse would still be a focus for growth, Todmorden would ease pressure on eastern Calderdale taking significant growth in housing,

employment and services. Todmorden would become the main service centre for the Upper Valley.

3. **Enhance the role of Elland** - Whilst Halifax and Brighouse would still be a focus of growth, Elland would have significant growth in housing, employment and services. Building upon Elland's success as a business location could provide regeneration for the town centre, and build a case for a new rail station.
4. **Current role and function** - Development would be spread across Calderdale taking account of the current level of services in each place. The amount of development would be based upon the settlements ability to cope.

**4.29** The approaches raised significant discussion with conflicting comments; however there was support and objection to all four approaches.

### General Comments Made

**4.30** Many comments did not relate to any specific approach but rather suggested criteria for a 'Preferred Option'. The criteria were wide-ranging and often conflicting.

## Core Strategy Key Themes 12

### Development Location

Some wanted development focused on larger settlements (Halifax, Brighouse and the M62 corridor towns). In contrast others suggest development should be more widely spread.

A lot of comments wanted to protect the green belt and focus development within urban areas and/or on brownfield sites. In contrast others wanted a flexible approach to development in the green belt. Other comments suggest development should be focused on areas where regeneration was required.

The role of Brighouse was discussed with suggestions ranging from;

its strategic location means it should play a greater role than the approaches suggest; to minimised or stop growth in the town.

### Infrastructure

Concerns were raised over the ability of existing infrastructure, particularly roads and schools, to cope with new development. In addition the ability of the Core Strategy to deliver the required infrastructure in the current economic climate was questioned. Public transport was thought to be key by some with the need to improve the railways (including the stations), provide bus priority and quality bus corridors all mentioned.

### Existing RCUDP Allocations

The role of undeveloped RCUDP employment allocations was questioned with suggestions some sites should become green belt; and others wanting a flexible approach to such sites allowing housing development where sustainable.

### Other Issues

The need to work closely with neighbouring authorities for strategic opportunities was generally supported. In addition retaining the character and setting of our towns/villages and countryside was considered important.

### Approach 1: Focus on Eastern Calderdale

**4.31** This approach created significant discussion with comments received of both support and objection.

- Those supporting the approach consider it would be the most sustainable approach, focusing development in Calderdale's main urban centres and making the most of the strategic transport network, particularly the M62 and main railway stations. In addition the



- possibility of working with Kirklees MC on their strategic proposals for employment at Cooper Bridge were generally supported.
- The main objections to this approach were it would constitute 'over-development' of eastern Calderdale, particular concern was raised over Northowram and Shelf being a significant area of growth and impacts upon green belt boundaries. Other comments suggested the approach would be unsustainable as it would promote commuting particularly with regard to the M62. There were also concerns that it would effectively 'down-grade' Todmorden.

## Core Strategy Key Themes 13

### Sustainable Development

Several comments suggest this to be the most sustainable approach as it would focus development on our main urban areas and would make the most of the transport connections to Leeds, Manchester and beyond. However others comment that this proximity to the M62 would encourage people to live in the area but work outside it, making it an unsustainable option.

### Infrastructure

There was support for new rail stations at Elland and Hipperholme but some viewed this with caution as it may not be possible to deliver until 2019 at the earliest. There was concern over congestion in general but specific comment was made of Brighouse, and the need to upgrade the A644 to access Kirklees MC Cooper Bridge proposals.

The Highways Agency whilst neither supporting or objecting note this approach would impact upon the M62 but would not increase the stress on any link of the M62 above 85% - the point at which the agency becomes concerned over stress levels.

Some commented that this option would focus development on the areas with the greatest facilities, services and access to employment.

### Areas for Growth

Northowram and Shelf - were commonly referred to in the comments with many expressing concern over significant growth of these settlements. These issues raised were a loss of character for the settlements, impact upon the green belt and environment in the area, congestion and road safety and a lack of services/facilities.

In contrast the role of Todmorden was questioned as it would lead to less development within the town and effectively 'down-grade' its role.

### Cross boundary issues

This option was considered to compliment the work of neighbouring authorities by promoting development at Cooper Bridge (Kirklees MC) and along the Halifax to Bradford Corridor.

## Approach 2: Enhance the role of Todmorden

**4.32** This approach received comments of both support and objection. Whilst many did not rule out some development the majority were not in favour of the role of Todmorden being enhanced.

- Those supporting the option considered it would support regeneration and act as a catalyst for growth, providing additional infrastructure and support existing services and facilities.
- Objections considered this approach unsustainable, effecting the character of Todmorden, increasing congestion and a lack of available land.

## Core Strategy Key Themes 14

### Sustainable Development

Several comments suggest that significant development in Todmorden

as well as Halifax and Brighouse would be unsustainable promoting commuting along the Calder Valley or to centres outside of Calderdale. Others suggest Todmorden is too remote from existing centres with limited services and facilities to become a viable focus for growth. However access to the rail network and the possibility of creating a hub for digital/creative industries was considered by some to make Todmorden a sustainable location.

### Infrastructure

The reinstatement of the Todmorden Curve allowing direct access between Manchester and Burnley was supported.

Some argue current infrastructure provision in Todmorden will be unable to cope with the additional development suggested under this approach. In addition there was concern that raising the status of Todmorden may not bring the required transport improvements. Others considered expanding Todmorden would protect existing services and facilities in the town and act as a catalyst for growth.

The Highways Agency whilst neither supporting or objecting note the impact on the motorway network as a whole is similar to approach 1, but crucially it is likely to create additional stress at junctions 26 & 27.

### Areas for Growth

The majority of comments on this option focused upon the impact upon Todmorden. The main concerns were that the topography of the area meant the levels of growth could not be accommodated. A further concern was that significant development would have a negative impact upon the character of the town as well as the surrounding countryside.

### Other Issues

Whilst there appeared some appetite for modest growth some thought this should build upon the ideas of sustainable local food production

encapsulated in 'Incredible Edible'.

### Approach 3 - Enhance the role of Elland

**4.33** Again this approach received comments of both support and objection, however of those commenting a significant proportion could see benefits to enhancing the role of Elland.

- Those supporting this approach consider Elland possesses significant areas of brownfield land in a sustainable location near other large urban areas. It was also thought this approach could help regenerate the town through inward investment and bring more services and facilities.
- Objectors to this approach consider it would require significant greenfield development, threat to the green belt and the proposed rail station may not materialise.

## Core Strategy Key Themes 15

### Sustainable Development

Many consider Elland to be in a sustainable location due to existing services, employment opportunities and proximity to other towns. In addition it would focus the majority of development on our main urban areas and would make the most of the transport connections to Leeds, Manchester and beyond. However there are concerns that concentrating development near the M62 would encourage people to live in the area but work outside it, making it an unsustainable option.

### Infrastructure

The possibility of a new railway station for Elland was widely supported, although some question the deliverability of this. The



opportunities to access the strategic transport infrastructure including the M62 are considered a major benefit of this option.

The Highways Agency whilst neither supporting or objecting note it would impact upon the M62 but would not increase the stress on any link of the M62 above 85% - the point at which the agency becomes concerned over stress levels.

## Areas for Growth

The majority of comments on this option focused upon Elland with some suggesting the town needs substantial inward investment which this option could facilitate. Others note they would only support this option if the infrastructure improvements to Elland were viable. Comments suggest areas to the south west of the town as possible locations for growth. There were, however, concerns over the amount of development and impact upon the green belt in the area.

## Cross boundary issues

This option was considered to compliment the work of other neighbouring authorities by promoting development at Ainley Top (Kirklees MC).

## Approach 4 - Current role and function

**4.34** Like all of the other approaches this approach received comments of both support and objection, however it is notable that the majority of the comments did not support this approach.

- Those in support of this option considered it would preserve the current character of some settlements.
- The majority commenting objected on the basis it doesn't allow proper planning of the area and is not sustainable.

## Core Strategy Key Themes 16

### Sustainable Development

A number of comments indicate this approach would not provide the opportunity to address sustainability or regeneration issues as it would simply continue previous patterns of development in a dispersed manner.

### Infrastructure

The comments suggest this option would enable new transport infrastructure to be properly planned. In addition the Highways Agency whilst neither supporting or objecting note the impact of this approach is slightly higher than other approaches due to the distribution in traffic meaning stress on junctions 26 & 27.

### Other Approaches

**4.35** The comments suggested an alternative approach was a combination of approaches 1 and 3 to provide growth in Halifax, Brighouse, Elland to compliment proposals within Kirklees. Other variations on this included proportionate growth in Halifax, Brighouse, Elland, Sowerby Bridge, Todmorden, Northowram and Shelf with limited development elsewhere.

### Conclusions

**4.36** The comments on the four possible approaches provided many conflicting comments. It is however apparent that a number of over-arching principles for development together with elements of the different options require further investigation for possible inclusion in the next stage of consultation on the Core Strategy.

## Key Actions 12

### Development Principles for Core Strategy 'Preferred Option'

- Concentrate development on urban brownfield sites with incursions into the green belt only in exceptional circumstances;
- Our larger settlements should take the majority of growth;
- Consider locating development where regeneration is required;
- The infrastructure required for the option needs to be viable (including transport);
- Retain the character of the district and our towns/villages; and
- Need to work strategically with neighbouring authorities.

### Possible elements from existing approaches to build upon

- The focus upon Halifax, Brighouse and Elland has generally been supported (although not completely) as the main growth locations to aid regeneration, inward investment and infrastructure provision;
- The role of other towns such as Sowerby Bridge and Todmorden should be supported and apportioned growth as appropriate; and
- Limited growth in other settlements.

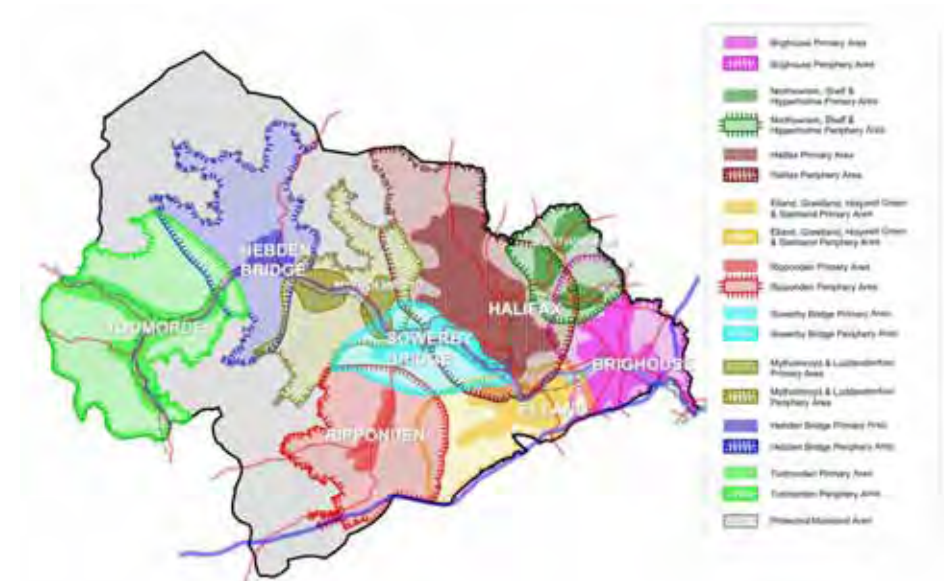
## Ten Areas

**4.37** The 'Introduction to our towns' section of the Core Strategy Refined Issues and Options identified 10 functional areas across Calderdale. It also introduced the idea that each of the 10 areas would have its own vision, complimenting a Calderdale wide vision and a 'primary' and 'periphery' area. The primary area generally related to the boundaries of the existing urban area and would be where development was concentrated. The periphery area related to the areas surrounding the

urban areas (usually rural/semi-rural in nature) which rely on the primary area for its services.

**4.38** A number of comments were received on the over-arching principles of identifying the 10 areas including the ideas surrounding a distinction between the primary and periphery of each area.

Map 4.2 The 10 areas



### Identification of the 10 areas

**4.39** There was broad agreement for the identification of the 10 areas across Calderdale. It was considered this approach recognised the 'Coalition Government's localism agenda which champions the importance of enabling local residents, communities and other interested parties to have greater influence on development in their communities' (Homes & Communities Agency). However there were a few concerns about reflecting

sensitivities at a detailed level.

**4.40** There were comments about the boundaries of individual areas, particularly the relationship of Northowram, Shelf and Hipperholme. Some agreed with the identification of Northowram, Shelf and Hipperholme as a separate area linked to Halifax and Brighouse (via the overlaps with these areas). Others whilst agreeing with the area suggested it should not be linked with Halifax and Brighouse as it can function separately with Hipperholme being its main centre. Finally others suggested Hipperholme should be part of the Brighouse area and separate to Northowram and Shelf.

**4.41** The Elland area also created discussion with suggestions that Stainland and Holywell Green should not be included in the Elland area but should be separate due to the differences in characteristics.

**4.42** There were concerns there appears to be a lack of a defined relationship between the Settlement Hierarchy and the 10 areas. Hipperholme was indicated as a case in point, the Settlement Hierarchy identifies the settlement as part of greater Brighouse but the Core Strategy identifies it as being in a separate area but still influenced by Brighouse.

**4.43** There were comments regarding green infrastructure (open spaces, rivers, moorland etc.) and the need to recognise its importance within all 10 functional areas and not just the Protected Moorland Area. This was because it provides opportunities for health, recreation, biodiversity and sustainable travel through walking and cycling.

## Vision

**4.44** Little comment was given to the principle of each area having its own vision, complimenting that of Calderdale. The only comment received focused on which vision would take primacy when decisions were made (Area or Calderdale).

## Primary/Periphery

**4.45** The identification of a primary and periphery for each area created conflicting views with some supporting the idea, others considering it divisive, some thought it unduly complicated, others that each area should be considered individually and others simply reserving judgement until more details were known.

**4.46** In terms of the boundaries between primary and periphery areas these were left intentionally vague within the consultation document, as it was the theory being tested not the detailed areas. However, a number of comments stated detailed boundaries were required to make the ideas work. Comment was also made that all semi-rural areas should be reclassified as periphery areas, Stainland and Holywell Green were suggested as places currently identified in a primary area which should be reclassified as periphery due to their semi-rural nature and lack of services. Hebden Royd Town Council also stated the Hebden Royd area of Hebden Bridge, Mytholmroyd and Cragg Vale should be viewed as a single cohesive area.

**4.47** An alternative to the primary and periphery was that criteria based policies should be applied to the areas regarding where development should take place.

## Core Strategy Key Themes 17

The comments upon the over-arching ideas for the 10 areas indicate;

- A general support for the idea of having separate areas within Calderdale;
- Some debate over the areas identified and grouped together; (Particularly Northowram/Shelf/Hipperholme and Elland/Greetland/Stainland/Holywell Green areas);
- Be sensitive to the roles of Hebden Bridge and Todmorden, promoting independent retailers;

- Purpose of the 10 areas and how they 'fit' with the Settlement Hierarchy needs clarification;
- The role of the vision needs to be clarified;
- Conflicting thoughts on the benefits of having a primary and periphery area.

## Conclusions

**4.48** The comments on over-arching principles for the 10 areas indicate a number of common themes which require further investigation before the next stage of consultation on the Core Strategy.

### Key Actions 13

- Provide additional clarity on the rationale for the 10 areas;
- Re-consider whether Hebden Royd should be a single area;
- Re-consider whether Hipperholme should be in the same area as Brighouse or Northowram and Shelf;
- The inclusion of Holywell Green and Stainland in the Elland Area should be reconsidered;
- The identification of the areas should take further account of the Settlement Hierarchy and the role of Green Infrastructure within all the areas;
- The relationship between the Calderdale wide vision and the area vision needs to be better defined;
- More information on the implications of the primary and periphery for each area needs to be provided and consideration of whether this should be replaced by a criteria based policy; and
- The boundaries of the primary and periphery for each area should be more clearly identified and consideration of whether they are currently correct.

**4.49** A summary of the comments received for each of the 10 individual areas is contained in the remainder of this chapter.

### Elland/Greetland/Holywell Green/Stainland

**4.50** Some 45 comments from around 20 different individuals/organisations were received. Support for the proposed vision was more explicit from developers but generally the comments concerned the current issues facing the area.

**4.51** A key feature of the responses is that they generally relate to specific settlements within the area, the majority of comments concerning either Elland or Stainland. Retaining the identity of individual settlements was a key issue as was avoiding amalgamating settlements since this could give a misleading view of their role and function. Interest was expressed in seeing the information on population by age group (Table 10.1) and housing completions (Table 10.2) by village. The need to balance new development and improve the economic prosperity of the area with protecting the existing character of this area, large parts of which are semi-rural, was a theme that came through clearly. Views ranged from wanting more development such as housing and a supermarket which was seen as helping to provide a more positive future for Elland restricting new development to supporting the existing community and respecting the character of settlements such as Stainland.

**4.52** Transport was a concern ranging from traffic which should be using the by-pass using local roads to a limited bus service in the Stainland area. As regards the need for a rail station in Elland support came from a number of quarters.

**4.53** The current lack of services and facilities in some settlements such as Stainland and Holywell Green is a concern, particularly as these have been reducing and they do not cater for existing residents, let alone any new developments that may be proposed. A number of examples of facilities that have been lost were quoted by residents e.g. Sowood School, Stainland Post Office etc.



**4.54** The issue of a supermarket in Elland generated a range of views from support for this facility and the benefits it would bring to the town to resistance since supermarkets would undermine existing retail outlets and the independent retailers should be supported.

**4.55** The glut of flat/apartment housing was quoted to illustrate the point that no more is required. It was recognised that there are brownfield sites in the area suitable for housing. High quality housing should be encouraged in Elland to encourage more of the 11,000 employees of Lowfields to live in Elland.

**4.56** Some viewed Elland's location as making it the most suitable area to host industrial, commercial and housing given road access to the M62. The Highways Agency support the strategic approach of working with Kirklees for a new employment area at Ainley Top providing employment opportunities for residents of Calderdale and Kirklees. A number of potential development opportunities were quoted, sometimes by those with an interest in these sites. An example of a site submitted in the 'Call for Sites' exercise and lying in a policy constrained area but locationally attractive, was put forward as an opportunity to test how serious the Council is about economic development.

**4.57** Concerns were raised about the way the 'primary area' is shown in Map 10.1 giving the impression that Stainland, Holywell Green and Elland are one continuous urban area even though parts of this area lie within the green belt. This was considered to be inconsistent with the Settlement Hierarchy Study and the Green Belt Review document and the settlement boundaries need to be correctly shown in order that urban sprawl can be identified.

**4.58** The issue of amalgamating the grid square scores from the Settlement Hierarchy study for Stainland and Holywell Green again came to the fore as it did in the comments made in relation to the section on the 'Role of our places' in Section 2. This approach is leading the two settlements together to be classified as a Local Centre when in fact they should be lower order centres. This was considered to be reinforced by the fact that under the retail hierarchy they are undesignated centres.

**Map 4.3 Elland/Greetland/Holywell Green/Stainland Area**



**4.59** The importance and benefits of Elland's heritage assets was recognised including by English Heritage who supported the vision for this area, especially those elements relating to protection of the area's heritage assets and its distinctive character.

## Core Strategy Key Themes 18

### Stainland and Holywell Green

- Stainland and Holywell Green should be recognised independently with their sustainability scores reflecting this approach and classified as lower order centres than a Local Centre (i.e. Neighbourhood/Small Rural Centres);
- Primary Area notation (Map 10.1) needs amending to avoid giving the impression that Stainland, Holywell Green and Elland are one continuous urban area, even though parts of this area lie within the green belt;
- Useful to see information on population by age group (Table 10.1) and housing completions (Table 10.2) by village.

### Elland

- Most suitable area that could host industrial, commercial and housing given road access to M62 and high quality housing should be encouraged to encourage more of the 11,000 employees of Lowfields to live in Elland;
- Support for strategic approach of working with Kirklees for new employment area at Ainley Top;
- Need for a competitive superstore as residents disadvantaged by lack of competitive pricing
- Large supermarket not needed as stores in Brighouse and Huddersfield near enough. Independent retailers in Elland and West Vale should be supported;

- Rail station desperately needed and efforts made to achieve this in order that the town can progress as well as for associated sustainability benefits;
- Historic settlement and archaeological evidence in historic core - should be archaeologically investigated and recorded in advance of development;
- English Heritage endorse need to reinvigorate town centre - historic core identified in 'Heritage at Risk' register as being one of conservation areas most at risk within the Region. Also many undesignated heritage assets.

### Likes and Dislikes

**4.60** Features liked included a sense of community, opportunities for local shopping and the good links to other places provided by bus services. Specifically in relation to Stainland its setting in a rural or semi-rural landscape was liked along with the fact it has a good primary school and a library. Dislikes included the height of the flats in Elland in relation to surrounding buildings and traffic congestion. Traffic volumes were also an issue in Stainland along with limited bus services. Here the lack of local facilities which have reduced in recent years was a concern. New houses were often large and beyond the price range of locals and also out of character with the village.

### What people would change and their hopes

**4.61** In terms of changes people would like to see, some wanted more housing around Elland where the agricultural land was of poor quality. Elland being the third largest town and well located makes it more sustainable to develop than Todmorden or Sowerby Bridge which have limited areas of influence and are not attractive locations for inward investment. Specific facilities required in Stainland included a community centre and more allotments.

**4.62** People's hopes for the area included retaining the character and

identity of settlements, protecting the green belt, more people working the land and recognition of the importance of agriculture and local food production. An increase in manufacturing and facilities such as a supermarket and a better shopping experience than that currently offered by Southgate were also mentioned along with the need for a rail station and small bus station.

## Barriers to hopes being met

**4.63** Barriers to achieving what people wished to see included a lack of investment in Elland along with the conflicts between the differing aspirations such as new housing eroding the character of settlements. Infrastructure deficient in relation to current developments, particularly as level of services have reduced, and so how can further development be supported. Lack of engagement with the community was also seen as an obstacle to realising people's hopes.

## Key Actions

**4.64** Key actions to make hopes a reality included engaging with all communities, including the smaller communities, as they are best placed to understand the implications of any decisions. Improvements to Elland require good marketing, more houses to the west of the town and using funding from developments to overcome highway problems arising from the development of the employment opportunities at Ainley Top. The LDF must recognise Stainland's distinctive and semi-rural character and the fact it contains few services and facilities. The LDF must also address improvements for the elderly. Other key actions include promotion of local produce and allotment provision.

## Core Strategy Key Themes 19

### Likes

- Community and local shopping;
- Good links via bus services;

- Traffic free road radiating from centre of Elland;
- Open Spaces, Green Fields, Living in countryside;
- Stainland's traditional setting in rural landscape;
- Good primary school, local library, wildlife and allotment provision (Stainland);
- Peacefulness of Stainland.

### Dislikes

- Flats in Elland too tall;
- Traffic congestion (particularly from traffic that should use by-pass);
- No community centre or local shop (Stainland);
- Limited public transport (Stainland);
- New houses, especially larger ones, outpricing locals and not in keeping with character of Stainland.

### What people would change and hopes

- Houses on land of little agricultural value surrounding Elland (land at Blackley Road/Hammerstones Leach Lane suggested);
- Increased levels of development as 3rd largest town and well located making it more sustainable to develop than Todmorden or Sowerby Bridge;
- Needs of elderly met including enabling them to continue living in Stainland;
- Reduced traffic volumes and additional bus shelter (Stainland);
- Community centre (Stainland);
- More allotment provision (Stainland);
- Green spaces retained;
- Separation of settlements (including protecting green belt) and identity of communities retained;
- Swimming baths retained;
- New rail station and small bus station;
- Increased manufacturing;



- Improved shopping experience from that currently experienced on Southgate;
- Supermarket;
- Land being worked properly demonstrating importance of agriculture to community, more dairy cows and more people growing own food.

#### Barriers to hopes being met

- Insufficient money spent on Elland;
- New housing would prevent retention of character around Stainland;
- More Supermarkets would erode character;
- Not using locally purchased produce;
- Lack of engagement with small communities;
- Infrastructure inadequate (Stainland).

#### Key Actions

- Engage each community and encourage village groups to participate;
- Market Elland well;
- Develop 2 large areas of land on Dewsbury Road and Huddersfield Road - residential elements will bring more people into the town and result in positive changes;
- Bold decisions from Planning Department;
- More houses to west of Elland (given constraints to east and south);
- Obtain developer contributions to fund improvements at Ainley Top and Junction 24;
- LDF to recognise distinctive and semi-rural character of Stainland;
- LDF to recognise needs of elderly;
- Consider effects of supermarkets on local shops - promote importance of local produce

- Prioritise allotment provision;
- Recognise importance of retaining Mechanics Institute (Stainland) as community centre.

#### Key Actions 14

- Make purpose of primary area designations clearer;
- Ensure clear recognition of role and function of smaller settlements within the sub-areas;
- Via Infrastructure Delivery Plan deliver infrastructure to meet current community needs and those generated by development and working with relevant agencies;
- Encourage reuse of vacant 'historic' buildings in Elland;
- Involve all communities in preparation of 'Draft Plan';
- Balance need for development against necessity to protect character, identity and setting of settlements throughout the area;
- Consider how the Core Strategy can address the more detailed aspects of some of the comments through the use of spatial planning.

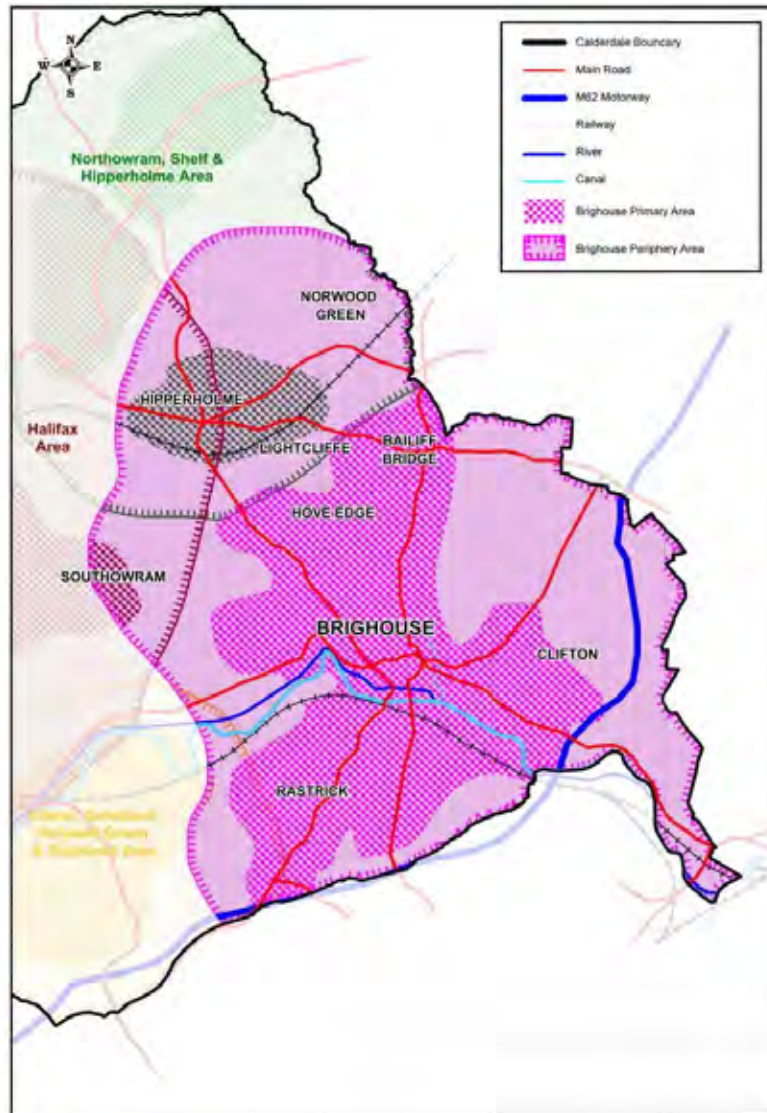
View of Elland



## Brighouse/Rastrick

4

Map 4.4 Map of Brighouse/Rastrick Area



**4.65** Nearly 80 comments were received from just over 20 different contributors. Broadly speaking the responses can be divided into those representing the interests of landowners in the area and those from local residents including community organisations. The former generally support those aspects of the section relating to the role of Brighouse as a principal town and its role of accommodating growth with reference to sites (often former employment sites) that will help achieve this growth. Comments from the latter category centre around wanting improvements to the vitality of Brighouse and transport, particularly bus and rail services, but without harming the environmental and historic character of the area. Specific and helpful comments were made by statutory consultees in respect of their own areas of responsibility.

### Proposed broad areas/sites for development

**4.66** These comments largely represent the views of landowners or their agents.

**4.67** Sites suggested in broad terms by landowners or their agents include the site of the former Clifton Mills, Bailiff Bridge, land adjoining the golf course and fronting Whitehill Road, Lightcliffe, land within the Rastrick area and considered able to satisfy the shortage of land for large industrial units identified in the Employment Land Review (2008), the Lightcliffe Works site at Hipperholme (could be redeveloped for mixed uses including housing which would unlock the potential of the area by providing funding for a solution to the highway problems in the area) and land around the William Henry Smith School, Rastrick.

**4.68** Housing was supported at the southern end of Rastrick which should avoid going into areas of higher quality green belt in terms of landscape value and agricultural use. Proximity of some of this land to the M62 may determine how much can be used for housing.

**4.69** A suggestion was made that in identifying broad areas for growth the following wording be employed in the Core Strategy:

*"An area of search for new housing will be to the south and west of*

*Rastrick, this will include a review of green belt boundaries to deliver sufficient land for housing for the Core Strategy period and with a view to securing longer term green belt boundaries an area of land will be identified which will be reserved for future development."*

**4.70** Focusing development on the main urban areas will encourage regeneration and the use of brownfield sites in areas that are already well related to existing employment opportunities, services and facilities and is in line with New Growth Point status.

**4.71** The Brighouse (and Elland) areas were seen by landowners/developers to represent the most attractive and accessible employment zones and the Core Strategy should build on this. The Core Strategy should provide the positive framework which enables local businesses to grow. Existing large scale employment areas should be retained for employment use but sufficient flexibility allowed to enable uses which generate economic growth (as advocated in PPS4). A new retail centre in Hipperholme away from the crossroads was supported in order to deliver sustainable development.

**4.72** Increasing the population in this area was supported but this provision should be for more family housing rather than apartments. More housing should take place in the Brighouse area and in one case this should be for more than that in the 4 overall spatial options set out earlier in the document. The fact that this can be largely integrated with the fabric of the existing settlement and round of settlements as opposed to extending into open countryside as suggested in the document was welcomed. Whilst supporting a new rail station at Hipperholme and its role in focusing growth in the east of the district, it was not considered essential in order that significantly more housing development could take place in the area. Increases in bus services and improvements to the crossroads in Hipperholme could improve the accessibility and sustainability of this area.

**4.73** Joint working with Kirklees in relation to employment provision was supported but it was also considered important to generate employment and provide houses locally. However, working in partnership with Kirklees would represent an appropriate level of co-operation between

the two districts assisting with the soundness of the Core Strategy.

**4.74** Support was expressed for Vision 1 but there was also recognition that the final vision may be a mix of the two suggested visions for this area.

### Concerns about growth

**4.75** These views were largely put forward by the local community and statutory consultees.

**4.76** The statutory consultees generally support those parts of the proposed vision relevant to their areas of interest whilst highlighting relevant issues. West Yorkshire Archaeological Advisory Service, for example, highlight the historic core of Brighouse whilst English Heritage are concerned about the poor state of repair of the listed buildings at Kirklees Priory. Concerns were also expressed regarding the proposed scale of development around Cooper Bridge in the Kirklees Core Strategy and its impact on the landscape setting of the settlements involved and the district's environmental assets. These include numerous designated heritage sites including those associated with Kirklees Priory.

**4.77** The Highways Agency expressed concerns that development proposals in both Calderdale and Kirklees together will result in a lack of capacity at junctions on the local road network leading to long traffic queues in peak periods that cause problems at M62 Junction 25 with traffic on the exit slip roads queuing back on the motorway. A joint investigation of possible ways forward by both districts in partnership with the Highways Agency is required.

**4.78** The fields below Clifton should be protected from employment development due to the inadequacy of the road infrastructure which already results in numerous problems and these would be made worse by development. Access to and from the M62 needs improving. Cooper Bridge in Kirklees has funding whereas the site at Clifton does not and so should be abandoned in favour of the Kirklees site. Instead of following the Employment Land Review which was prepared in conjunction with developers this latter group should be told where they can develop

otherwise the Upper Valley Areas will suffer.

**4.79** The future of Pond Quarry and its implications for the Lightcliffe Road/ Granny Hall Lane area was raised with numerous concerns listed including infrastructure deficits and the effects on the amenity of residents.

**4.80** The Sugdens Mill site in Brighouse needs a development of quality and imagination with an employment use suggested although lack of finance may get in the way of such improvements taking place.

**4.81** Traffic congestion was raised as a major issue with there being a need to improve the road network before more housing developments take place. Brookfoot Lane and Hipperholme Crossroads were mentioned as specific examples of where highway improvements are required. There was support for Hipperholme station as this would help the business case for improvements to the Caldervale line and any modal shift away from the car will reduce pressure on the road network. An integrated transport strategy is needed and since people will not give up their cars car parking needs factoring into developments. The effect of congestion on local businesses was also pointed out. However, the likelihood of road improvements in the current financial climate was questioned.

**4.82** Brighouse Civic Trust wish to see improvements to Brighouse ensuring a vibrant town with improved rail links but do not wish to see it develop as a commuter town or be over-developed ruining its character. Other views included only supporting development in Brighouse if it had unique development potential not available elsewhere along with the view that Brighouse just needs a bit of modernising and improvements to bus and rail services. No more houses should be built in Clifton. There was support for the development of brownfield sites in order that green belt sites be protected whilst concerns were expressed that the sites identified through the 'Call for Sites' exercise identified sites, which if developed, would have a major impact on the green belt and existing facilities and services. A view was also submitted that the decline in manufacturing was being helped by encouraging brownfield sites which are often former employment sites to be developed for housing. Given the current recession which will go on for a number of years people will not be able to buy houses

that are built. Brighouse should be allowed to grow organically in order to meet the community's need for housing having adequately calculated that need. Brighouse should not be given the status of a Principal Town. Allowing Tesco had led to the demise of the town centre, particularly as it was now classified as being within the town centre.

**4.83** Regarding the vision for Brighouse having to fit in with the overall district wide vision, this should be replaced with the latter being a composite of the area visions.

## Core Strategy Key Themes 20

- A number of sites and broad locations were suggested by landowners or their agents and recognising the locational advantages of this part of the district including the New Growth Point;
- The joint working with Kirklees was supported but the need to provide for economic growth and for housing within the district also has to be recognised;
- Whilst a review of green belt boundaries was considered essential this should be done so as not to harm those parts of the green belt of higher landscape, wildlife and agricultural value;
- A new rail station at Hipperholme/Lightcliffe was supported for the focus it would provide for the eastern part of the district but was not seen as essential to allow significantly more housing development;
- Brighouse has an historic core and there will be below ground archaeological remains which should be investigated and recorded as per PPS5;
- Historic assets such as Kirklees Priory must be protected including their setting;
- Highway congestion is a major issue and proposed developments in both Calderdale and Kirklees will exacerbate this;



- The green belt must be protected with brownfield sites used for new development;
- Measures leading to improved vibrancy in Brighouse including improved public transport links are supported but it should not suffer from loss of character due to over-development or becoming a commuter town;
- A number of specific locations where local residents have concerns include Pond Quarry, Sugdens Mill and RCUDP Allocation EM42 at Clifton.

### Key Actions 15

- Analyse the areas suggested for growth both in terms of overall development potential but also for specific forms of development (e.g. the need to retain employment sites);
- Re-assess the level of housing provision for the Brighouse/Rastrick Area;
- Further explore the opportunities for economic growth in the Brighouse/Rastrick Area and word policies to help achieve economic growth;
- Ensure any proposals properly reflect the need to protect historic and environmental assets including their setting;
- Continue discussion with the Highways Agency over the implications of any development proposals on the highway network;
- Full account of the infrastructure needs arising from development to be considered and reflected in the Infrastructure Delivery Plan;
- In planning for the future of Brighouse ensure its character is respected and any development respects its sense of place;
- Prioritise the use of brownfield sites including taking on board the comments received in respect of specific sites and the need to retain employment sites.

## Sowerby Bridge

### General Comments

**4.84** In terms of the comments received on Sowerby Bridge, the main concerns surrounded environmental constraints, the vision, employment levels, Holmes Road and the wider Copley Valley Scheme, the station, public transport, congestion, types of housing, and Green Infrastructure assets such as the River.

### Environmental Constraints

**4.85** Some consultees requested that Scheduled Ancient Monuments (such as Castle Hill) should be considered as a 'hard' environmental constraint, and that archaeological remains will need investigating and recording in advance of development, and therefore these should be included as a soft constraint.

### Vision

**4.86** There was some support for the Vision, although it was suggested a reference to the Upper Calder Valley Renaissance emphasis on the distinctive character of the area was included, as following "*Visitor numbers will have increased attracted by the area's distinctive character, it's town centre and the leisure opportunities offered by...Etc*".

### Opportunities that exist

**4.87** Because of the shortage of flat, accessible employment land (with a specific reference to the Sterne Mill site), such sites should be developed for employment instead of housing, as there is a need for more jobs rather than more housing. There was also a suggestion that the Holmes Road scheme and the Sowerby Bridge /Copley Valley scheme be ditched entirely. Others felt the Copley Valley Scheme would fail to support the objectives for the Holmes Road area, although if they were to go ahead, the Holmes Road scheme needs to be in place first, otherwise the opportunities would be sterilised due to the larger scheme congesting the available highway



capacity.

**4.88** There was support for maintaining and enhancing the railway, and a recommendation that any development growth was in line with local needs and could be accommodated by sustainable transport modes, particularly bus and rail. Other comments cast doubt on the opportunity for rail improvements to support additional housing.

**4.89** The final question asked for peoples likes, dislikes, changes, hopes, barriers to those hopes, and key actions in relation to the area. Whilst not all parts of the question were commented on, there were a number of general comments made.



**4.90** There was an objection to any more development in Sowerby Bridge that adds to congestion, and an end to the development of large houses, with a need for considerate development. A request was made for additional allotments to be provided, as long as these did not occupy industrial sites. Traffic studies had shown the development of large sites in the Sowerby Bridge /Copley Valley would have an adverse impact on the M62 at Ainley Top, and any development on these sites would therefore require a travel plan and financial contributions for improvement works at the motorway junction. The river and canal corridors were seen as important Green Infrastructure assets and the waterside environment should be enhanced for people and wildlife. Other consultees agreed with the need to improve access to the station for cyclists and pedestrians, to allow integrated rail / cycle journeys and to link with bus services as well.

## Core Strategy Key Themes 21

The comments on the Sowerby Bridge section of the Core Strategy indicate a clear message that:

- Scheduled Ancient Monuments and Archaeological remains should be added to the Environmental Constraints;
- The vision should include reference to the distinctive character of the area;
- There is a shortage of flat, accessible land for employment;
- There is a need for more jobs rather than more housing;
- Development should meet local needs;
- Objections to the Copley Valley /Sowerby Bridge development;
- Objections to any development that adds to congestion;
- Large development sites should provide funding for improvements to junctions;
- The Holmes Road scheme would fail if the Copley Valley scheme went ahead first;
- Support for maintaining and enhancing the railway;
- Agree that access to the station needs improving;
- The River and Canal corridors are valuable assets.

## Key Actions 16

- Consider adding to the environmental constraints;
- Refer to the distinctive character of the area in the Vision;
- Further work on matching employment and housing land to local needs;
- Protect and enhance Green Infrastructure such as the river and canal;
- Carry out further work on policies that support public transport.

## Northowram/Shelf/Hipperholme

### General comments

**4.91** The main themes from comments received were the re-opening of the railway station, traffic congestion at Hipperholme crossroads and elsewhere, the character of the villages, the need to avoid merging into one larger settlement or into the Bradford urban area, questioning the need for additional housing, potential for a new local centre in Hipperholme, the pressure on existing infrastructure, hard and soft environmental constraints, additional Conservation Area Appraisals, and the need to protect the green belt. Others referred to a poor public transport service, and Shibden Valley was highlighted as an asset that needed protection. It was suggested that development would be best accommodated in the larger towns as opposed to the smaller settlements, and a lack of jobs for both existing residents and potential new ones was also emphasised.

### Role of Place / Services and Facilities

**4.92** It was suggested that Hipperholme merits its place as a 'Local Centre' whereas Shelf and Northowram should be 'Rural Centres', in addition, since both Hipperholme and Northowram have more facilities than Shelf, any further residential development in Shelf should be kept to a minimum. Some comments pointed to a lack of suitable facilities for young or old in Shelf, and doubts were cast as to whether opportunities to improve the retail capacity existed. A knock on effect would be the increased car use by any new residents in Shelf due to this lack of facilities. Northowram was suggested by some to have 'everything it needs for the community' and there was no need for more houses, and resulting loss of green fields, since the existing village infrastructure would not be able to cope.

### Employment Issues

**4.93** Comment was made concerning the potential for empty business premises to be brought back into commercial use. The unsuitability of the current road network in Northowram for industry was mentioned, which

led to traffic problems relating to existing employers in Northowram. The LDF needs to ensure that improvements to road and rail infrastructure in the area are secured in order to encourage economic development. Questions were asked concerning the impact on existing businesses in Hipperholme if a new district centre was developed.

### Social Issues

**4.94** A comment was made concerning the need to direct any resources for redevelopment towards those areas of deprivation. Additional development would increase pressure on school places, with those who had lived in the village for a long time already struggling to get places for their children in the school. The well being of existing residents would also be affected by extra housing.

### Housing Issues

**4.95** The role that the Council could play in bringing empty houses back into use and therefore reduce the need to build new ones was mentioned, in addition, the impact of the buy to let market and the ability of first time buyers to purchase a house should be acknowledged. Emphasis should be placed on the design of housing, and while there is a need for social housing, these should be delivered through local authority controlled housing associations, rather than the small numbers often delivered by private housing associations. In addition, a comment highlighted the need to avoid losing local history to enable such development. Some clarification of the status of SHLAA sites was requested. Some support was evident for building new homes on brownfield sites close to a potential station.

### Transport

**4.96** Problems concerning both the Hipperholme Junction and the bus stop at the crossroads need to be resolved once and for all. The opportunity to re-open Hipperholme railway station was considered by some to be an excellent solution to reducing congestion at the crossroads, and some support was evident for building homes on brownfield sites near to the station, although others felt justifying a new station through developing

additional housing was wrong, as these will be in the wrong place to support the needs of the industrial regeneration. Other comments advised a redesign of the Hipperholme junction due to the high number of road accidents, and altering the sequencing of lights. The loss of local employment and facilities along with more people working unsociable hours, has increased car travel and therefore congestion. Traffic lights at Stump Cross were identified as causing congestion in Northowram and Shelf, any additional housing in Northowram would just add to this. Congestion was not just confined to Hipperholme or Stump Cross, and new developments elsewhere had the potential to cause problems. Any improvement to the Halifax - Bradford corridor was seen as problematical due to the ribbon nature of Shelf. Some responses indicated the areas roads are used by people trying to bypass Bradford when travelling towards Keighley and Skipton. There were few complaints about public transport, although the bus service to Hipperholme and Brighouse from Shelf was considered to be poor.

## Heritage

**4.97** Comments referred to the need to avoid destroying the character of the villages, and the number of Listed Buildings in Shelf was suggested as a reason for a Conservation Area Appraisal, especially following the recent award of a Conservation Area in Northowram. It was emphasised that environmental constraints are exactly the reason why the area is a popular and enjoyable place to live, and therefore need protecting. With the historic nature of the area, archaeological remains will need investigating and recording in advance of development, and it was requested these be included as a soft constraint.

## Environmental Constraints

**4.98** Further explanation of the 'hard' and 'soft' constraints was needed, with concern expressed about the difference between statutory designations and 'infrastructure inconveniences'. There was some support for considering green belt as a 'soft' constraint, as some felt that it was constraining businesses located in the green belt. Others felt the green belt is important in order to retain settlements identity, stopping Calderdale's

and Bradford's urban areas merging, providing leisure opportunities, and offering protection and enhancement for biodiversity. Conservation Areas, Listed Buildings, and Tree Preservation Orders were not to be considered 'soft' constraints, and should therefore not be up for negotiation. Losing green belt round the village(s) will change the outlook forever, and it was suggested there are sufficient sites identified outside of the green belt for development. There was concern that Special Landscape Areas did not appear as a constraint, and a request that Shibden Hall should be identified as a hard constraint.

## Vision

**4.99** The vision was supported by some consultees, but some considered there should be more emphasis on the need to deliver more housing in this area of Calderdale, and suggested there was potential for growth in all three settlements. There was support for a new district centre in Hipperholme as part of the growth of the area, whilst others considered further residential development in Shelf unsustainable given the lack of employment, schools and shops. The vision should refer to Shibden Hall and its Registered Park, as it is a key tourist asset in the area.

## Opportunities

**4.100** Support was expressed for a comprehensive redevelopment of the area to the South of Hipperholme crossroads, whilst developing brownfield sites are opportunities which need to be seriously considered. A new railway station was considered to be an excellent solution to traffic congestion at Hipperholme, and some felt that any development affecting the crossroads should make a financial contribution towards a new station and other sustainable transport improvements. Other suggestions supported the railway station as part of the new growth point proposals for housing development, which would also support a new centre in Hipperholme. Another view questioned the feasibility of re-opening the old station, since there are no facilities for car parking, and disabled access would be a problem. A high amount of investment would be required and employment opportunities would need to be improved to justify the new station. Existing financial commitments by Metro would also restrict

potential, as would the increased journey time resulting from extra stations. Others felt that it is realistic to downplay the potential for rail improvements to support new housing development.

### District Wide Spatial Options.

**4.101** Some of those favouring Option 1 supported development in all three areas, referring to potential development sites in and around the three settlements, as well as Northowram's location in relation to the Leeds City Region, its role as a Local Centre, and its accessibility. Some felt that Hipperholme has an important role to play in enhancing the role of Brighouse as a Principal town by delivering housing and some retail growth. Comments also expressed the view that Option 1 would encourage development of urban brownfield sites and sites in areas that have existing employment opportunities and services and facilities, delivering houses in the most sustainable locations in the district.

**4.102** Alternatively, those objecting to development in the area pointed to the lack of connection to the City Region from all three settlements. Some consultees objected to a new centre for Hipperholme, stating that this would be significantly more inconvenient for most residents, and considered the information relating to empty shops in Hipperholme very misleading, listing the facilities that exist in Hipperholme. On the other hand, there was support for a new retail centre away from the crossroads, with this particular area considered an opportunity to develop sites in a sustainable manner and location without encroaching into the green belt.

**4.103** There was support for Option 4, providing that Shelf would maintain its present role and character, and only small scale development that meets the needs of the village being permitted after full local consultation. In order to provide funding to enable junction improvements, it was indicated that schemes would need to be housing led, with a new retail centre alongside employment and service facilities.

**4.104** Comments stated that the area is home to a large number of employers operating in the green belt, and the retention and growth of these continues to provide employment and innovation. It was pointed out

that due to the nature of some of the employers, their isolated location in the green belt minimises any adverse amenity impacts on the areas residents, and the LDF should encourage their growth and development, especially those in the waste management and renewable energy sectors, with an associated aim to provide renewable energy for all homes in the area. Any section 106 monies secured through employment development in the area should be used to improve the road network.

**4.105** Question 8 asked about peoples likes, dislikes, changes, hopes, barriers to those hopes and key actions in relation to the area. The following section summarises these comments.

### Likes

**4.106** Part of the appeal of this area is considered to be the scattered groups of buildings in open countryside, and living in historic village locations surrounded by green belt. The scenic quality of the Shibden Valley was highlighted, as was the accessibility to open countryside and the distinctive nature of the three settlements. It was also considered that Northowram has adequate facilities for daily needs and the proximity to Halifax means there is access to a wider range of services and facilities.

### Dislikes

**4.107** It was felt that large developments have diluted the character of the area. Comments also related to the unsustainable nature of the amount of large houses, suggesting instead the approach should be to develop more safe spaces to roam in and for children to play in. The impact of commercial activity on the periphery of Shibden Valley and the associated rat running rush hour traffic was also referred to.

### Changes

**4.108** The re-opening of the railway station at Hipperholme was a popular comment, with other comments relating to limiting traffic levels, and enhancing the existing footpath network.



## Hopes

**4.109** Some hoped the area would become home to small places that each had a stronger identity, with suggestions that each small hamlet could accommodate a few houses, at the same time avoiding any major development which has been difficult to absorb and attracted opposition. Some of the poor quality land could be developed for housing or employment, with a focus on brownfield sites. Support was expressed for bringing redundant agricultural buildings back into use for employment, providing local job opportunities, in turn reducing traffic. It was hoped the Council would support lower density development to ensure the area retains its attractiveness. Others expressed hope that sustainable public transport would be supported, along with manufacturing, but only on appropriate sites and not in the Green Belt. Community facilities should be supported, but the need for further retail was questioned, unless it was strictly proven this was the case. Any major development would need to be of a sustainable nature with good transport links. It was hoped the plan would protect the green belt and Special Landscape Areas, and the peaceful rural character of Shibden Valley would be retained, alongside the enhancement of the Conservation Area in Northowram.

**4.110** Certain locations, for example between Halifax and Queensbury, where existing activities such as quarrying, tipping and waste operations take place could provide opportunities and focus for employment developments that need large areas of land away from other uses, especially as there are few similar sites in Calderdale. It was suggested such an area could be designated as Enterprise zones.

**4.111** Other comments focused on the hopes that the area would be protected from development, with no development encroaching on the green belt, with some making a specific reference to the historical area around Westercroft Lane, Northowram. Any industrial units developed here would disfigure the landscape and views. Although the idea of a new playing field was not objected to, it was pointed out the fields are some of the best agricultural land in Northowram, and home to historic stone walling and ancient foot pathways. The area is a very important green space for the village of Northowram, and also forms a natural corridor for wildlife.

## Barriers

**4.112** Some thought green belt and green field restrictions on development were too restrictive, and the LDF would need to have a more flexible policy, suggesting that a series of small developments is unlikely to create as much opposition as large scale developments, an example given was the strong feeling in Northowram that the village has been swamped by development. Another set of comments suggested that new housing in Northowram is in excess of local need for the elderly, expressed concerns over the major expansion of commercial premises, and the possible impact of wind farms on the plateau between Shibden and Halifax. Other comments suggested that rather than congestion or accessibility, the main reason for businesses not locating to Calderdale was the lack of financial incentives or grants.

## Key Actions

**4.113** It was felt the LDF should make it clear that as development of all types is required, it would be fairer if development was spread out and shared over the area. The green belt should be pulled back to allow for small scale development, with good design the key requirement for such developments, secured through design competitions. The larger employment sites in the green belt should be given a specific policy that allows for extensions and improvements, in order to give confidence to investors, as competition with other districts that have higher quality industrial land is a real danger to the local economy. Some other consultees referred to the need to make public transport and other sustainable forms of travel more a more competitive alternative to car commuting.

**4.114** There was concern that development in Hipperholme would increase the pressure on the M62 at Chain Bar, but on the other hand should local highway improvements actually make the route more attractive to additional traffic, this could place yet more pressure on the Chain Bar junction. Another consultee felt the way to make their hopes for the area a reality was through appropriate policies in the LDF and a consistent application of them through both development management together with enforcement action, and adequate resources to apply this approach.



## Core Strategy Key Themes 22

The comments on the Northowram Shelf and Hipperholme section of the Core Strategy indicate a clear message that:

- Road and Rail infrastructure needs improving;
- Pressure on existing infrastructure;
- Support for re-opening Hipperholme station;
- Congestion is a real problem, at Hipperholme, Stump Cross and elsewhere;
- The character of the Villages needs protecting;
- Shibden Valley and Shibden Hall / Park are important assets;
- Mixed views on additional housing;
- Mixed views on a new centre for Hipperholme;
- Good design is important;
- Important to retain the Green belt;
- Additional environmental constraints should be applied;
- Important to recognise employers needs in the green belt;
- Consider small scale development in the villages;
- The LDF policies need to be applied in a consistent manner.

## Key Actions 17

- Consider how to deliver improved infrastructure;
- Consider additions to environmental constraints;
- Ensure policies encourage good design;
- Protect the character of the villages;
- Consider views of both residents and employers in the Green Belt;
- Consider views on a new centre for Hipperholme;

- Carry out further work on the potential for a new station;
- Consider the ability of the villages to accommodate further housing and employment development following comments made.

## Halifax

**4.115** The Halifax section of the Core Strategy document attracted a number of comments through the consultation. The majority related to either the town centre or North Halifax where the possibility of an 'urban village' of up to 2000 new homes in a mixed use development had been suggested.

**4.116** Comments on Halifax were also made during separate events, particularly the 8 'Planning Aid' and 7 'Young People' events. These can be seen in the relevant sections of this document or on the Council website.

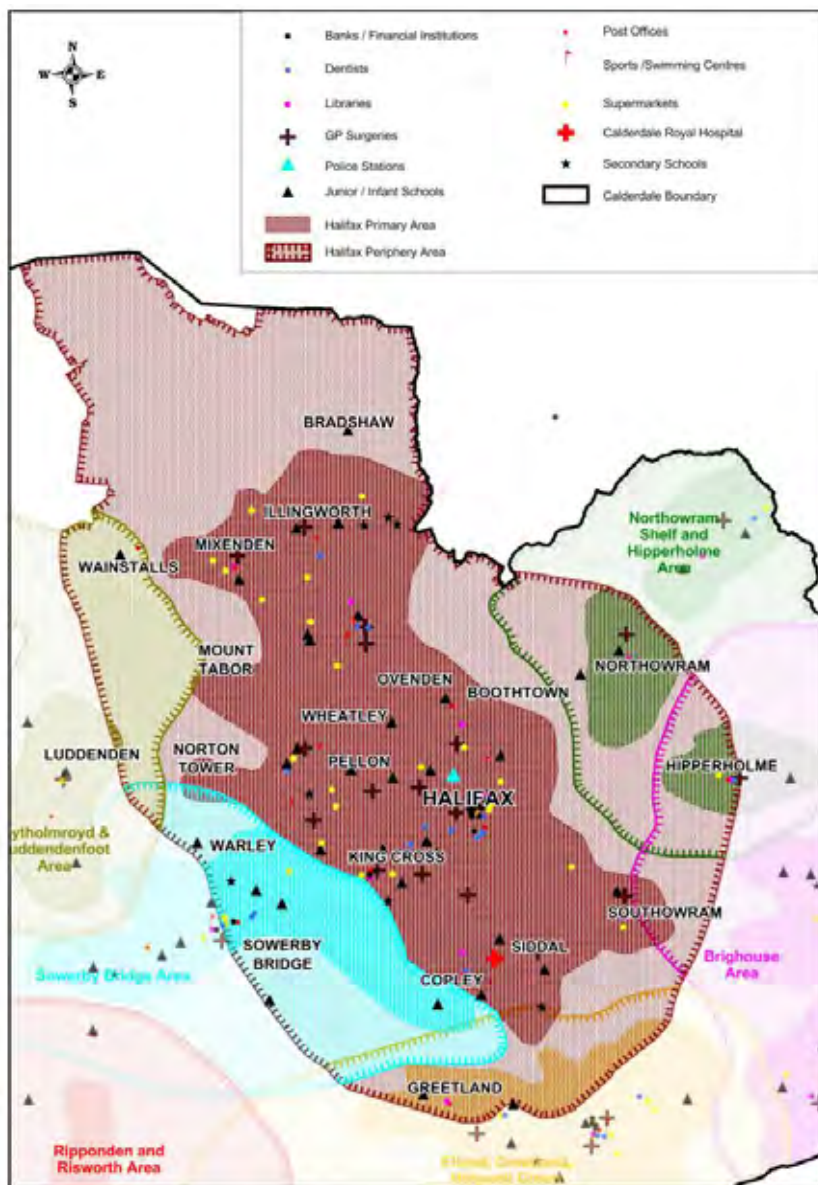
## General comments

**4.117** It has been suggested the Halifax area should be amended to exclude Northowram and Hipperholme from its periphery. Other comments were received suggesting that if Northowram and parts of Hipperholme are included in the Halifax periphery area they would be well placed to assist in contributing to the housing needs of Halifax.

## Halifax



Map 4.5 Map of Halifax area



## Environmental constraints

**4.118** It was suggested that registered parks and gardens and scheduled ancient monuments such as People's Park, Shibden Hall and the Gibbet Platform should be identified as 'hard constraints' to development. The Refined Issues and Options consultation did include these features as 'hard constraints' however, future consultations on the Core Strategy will ensure that it is clear these are protected.

**4.119** Concerns were expressed that the green belt was considered a 'soft constraint' and that the green belt around Halifax town centre should be protected. Other comments on the Halifax area have suggested that green belt restrictions should be relaxed for businesses near deprived areas. The general issue of green belt raised a number of often conflicting comments throughout the Core Strategy document, particularly in the 'Possible Approaches' section.

## An Emerging Vision

**4.120** A number of comments were made specifically on the emerging vision for Halifax which took as its starting point the visioning work undertaken in 2004 through 'Halifax: Streets Ahead!' and the work on the Halifax Masterplan in 2009. The draft vision for Halifax was supported by those commenting upon it, particularly the Piece Hall being at the hub of the town centre, providing it is well connected to other areas. The role of Dean Clough was queried as it was suggested it is peripheral to the town centre. In addition some respondents thought the role of the Shibden Valley should be reflected in the vision.

## Opportunities that exist

**4.121** There were a number of comments regarding the two main opportunity areas identified in Halifax.

- **Halifax Town Centre and Northern Hebble Valley**

**4.122** The comments for Halifax town centre focused upon improvements

to the shops, restaurants, leisure attractions and safety of the town centre particularly from Young People (more detail can be read in the section 7 'Young People'). There was support for re-opening the Hebble Brook, comments that the Piece Hall should be the priority for regeneration and that Market Street should be pedestrianised. It was also suggested that the town needs to be better connected, particularly with the bus and train stations.

**4.123** The economic profile of the town was also considered to be poor with comments received suggesting it needed to raise its profile through new high quality housing and employment sites.

**4.124** There was concern that the proposals set out within 'Halifax: Streets Ahead!' and the Masterplan should not be followed without reconsideration of the options for the town centre, although there was support for an enhanced town centre provision in Halifax.

#### • North Halifax

**4.125** Concern was raised over the potential for an 'urban village' of up to 2000 new homes in North Halifax with reasons such as potential loss of green belt and open spaces, lack of employment and continuous growth for 60 years being given. However, development was not wholly ruled out and the need to finish existing sites and allocations and new leisure/recreation opportunities were supported. These comments were similar to others raised through the Planning Aid workshops ( 'Boothtown Residents', 'Illingworth Residents' and 'Mixenden Residents').

**4.126** Whilst neither supporting or objecting to the ideas for North Halifax the Highways Agency note development within the area would have less of an impact on the motorway network.

### Core Strategy Key Themes 23

The comments on the Halifax section of the Core Strategy indicate a clear message that;

- There is an aspiration for a better town centre;
- Linkages within and across the town need to be improved;
- The Piece Hall needs to be enhanced;
- The scale of the urban village concept for North Halifax currently appears too large; and
- The economic profile of the town needs to be lifted.

### Conclusions

**4.127** The comments on the Halifax section of the Core Strategy highlight a number of common themes which require further investigation for possible inclusion in the next stage of consultation on the Core Strategy.

### Key Actions 18

- Further work concerning improving Halifax town centre;
- Work upon the 'vision' for Halifax is required;
- The need to raise the profile of Halifax providing more and better quality employment and housing opportunities;
- A need to further consider proposals for an 'urban village' in North Halifax.

### Todmorden

**4.128** A number of comments were received in relation to the Todmorden sub-area, a large number of which related to environmental constraints and the impact the district wide spatial options would have on the town. The following general issues were also raised by consultees:

- Public transport facilities should be improved to include better disabled access;
- The retail offer of the town should be strengthened;

- Small infill housing schemes should be encouraged;
- Local food production should be encouraged;
- Links should be developed to employment opportunities in neighbouring authorities;
- Local water sources should be used for micro generation;
- Large scale development in Todmorden is unviable due to existing and predicted highway congestion;
- Better parking facilities should be provided and parking charges reduced.

## Environmental Constraints

**4.129** Comments received in relation to environmental constraints included:

- Whilst it is possible to overcome many of the constraints listed, in practise the expense of the measures required to do this is prohibitive to development;
- The Area Around Todmorden should not be treated with any less importance than equivalent green belt areas.

## An emerging vision

**4.130** Comments received in relation to the emerging vision statement included:

- General support for the proposed vision for Todmorden;
- Support of the intention to promote Todmorden as a centre of heritage;
- The vision does not give sufficient emphasis to the fact that historic character can be a unique selling point;
- Large scale development would counter the intention of the vision to protect open space;
- Despite the intentions of the vision, Todmorden's Conservation Area has been at risk for a long time but little has been done to rectify this.

## Opportunities that exist

**4.131** Comments received in relation to the identified opportunities included:

- Support for a cycle path providing a link to neighbouring authorities as part of a wider strategic network;
- Support for a new mixed-use waterside development;
- Support and criticism for the creation of a creative media building in Bramsche Square;
- Support for rail enhancements and reinstatement of the Todmorden Curve;
- Expand independent businesses;
- Create more employment and affordable housing.

## District Wide Spatial Options

**4.132** Comments received in relation to the district wide spatial options included:

- Option 2 is not a suitable option for a remote location such as Todmorden which is subject to flooding, is geologically unstable and already has highway congestion;
- The principal town status will change the infrastructure and demography of Todmorden in a way that destroys a historical grown community;
- Option 2 is over ambitious and ill thought out;
- Agree with Option 2.

## Core Strategy Key Themes 24

The comments on the Todmorden section of the Core Strategy indicate a clear message that:



- Large scale development in Todmorden is considered unviable due to existing and predicted highway congestion and loss of open spaces and heritage;
- Overall, there is opposition to Option 2 - Enhancing the role of Todmorden;
- Transport is the other common theme from congestion on the roads to provision of improved public transport and sustainable travel modes such as cycle routes.

**4.133** The comments on the Todmorden section of the Core Strategy highlight themes which require further investigation for possible inclusion in the next stage of consultation on the Core Strategy.

### Key Actions 19

- Explore the possibilities of and support proposals for reinstatement of the Todmorden Curve and other rail enhancements.
- Re-consider the possible 'enhancement' of the role of Todmorden.

### Hebden Bridge

**4.134** A number of comments were received in relation to the Hebden Bridge sub-area. The following general issues were raised by consultees:

- Public transport facilities should be improved to include better access and higher capacity;
- Hebden Royd should be considered as a cohesive service area similar to Todmorden;
- Social housing schemes should be encouraged;
- The area has room for housing and light industrial growth;
- More leisure facilities are needed;

- Car parking facilities need to be improved for local people;
- The town has a lack of social diversity;
- Opportunities should be taken to enhance the waterside environment for both people and wildlife.

### Environmental Constraints

**4.135** Comments received on environmental constraints included:

- Classing SSSI and Special Landscape Areas as soft constraints would appear to be another weakening of previous planning policy.

### An emerging vision

**4.136** Comments received on the emerging vision statement included:

- General support for the proposed vision for Hebden Bridge;
- The vision should make reference to the distinctive character of Hebden Bridge being retained;
- The vision should make reference to the landscape setting of the town being retained.

**4.137** English Heritage has suggested an alternative vision which reads as follows:

***'Hebden Bridge has retained its distinctive character and landscape setting and is a vibrant and attractive place to live and has a good level of economic, social and environmental well being. The vitality and diversity of the population has been maintained and a balance has been achieved between its success as a tourist destination and its popularity as a place to settle.'***

### Opportunities that exist

**4.138** Comments received on the identified opportunities included:

- Support for a cycle path providing a link to neighbouring authorities as part of a wider strategic network;



- The objectives should be supported and developed;
- Better linking the station and town for pedestrians is achievable;
- Green routes should also be made suitable for cyclists;
- Create more employment and affordable housing.

## District Wide Spatial Options

**4.139** Comments received on the district wide spatial options included:

- Hebden Royd Town Council has stated that Hebden Bridge is only a part of the Hebden Royd area and Hebden Royd Council treats the three areas of Hebden Bridge, Mytholmroyd and Cragg Vale as a strategic whole. With this in mind, Hebden Royd should be considered as a cohesive service area similar to Todmorden. Hebden Royd Council go on to state that it is likely that the growth of Todmorden would benefit Burnley and Rochdale rather than the upper valley.

## Core Strategy Key Themes 25

The comments on the Hebden Bridge section of the Core Strategy indicate a clear message that:

- There is widespread support for better pedestrian links between the town centre and the rail station;
- Transport is the other common theme from congestion on the roads to provision of improved public transport and sustainable travel modes such as cycle routes.

**4.140** The comments on this section of the Core Strategy highlight themes which require further investigation for possible inclusion in the next stage of consultation.

## Key Actions 20

- Explore the possibilities of and support proposals for improved pedestrian links between the town centre and the rail station;
- Consider including Hebden Bridge, Mytholmroyd and Cragg Vale in a revised area called Hebden Royd;
- Consider the alternative vision for Hebden Bridge.

## Mytholmroyd/Luddendenfoot

**4.141** Only a small number of comments were received in relation to the Mytholmroyd/Luddendenfoot sub-area.

## Key Characteristics and Challenges

**4.142** The following sections of the context section for Mytholmroyd/Luddendenfoot received comments:

- Population - it was suggested that the plan should specifically raise the issue of an ageing population due to the time scale of 15 to 20 years of the plan;
- Employment - previous decisions to use industrial land for new housing development do not balance creating jobs for local people. The area has one of the lowest job numbers in Calderdale and a better balance between residents and jobs is required; and
- Transport - routine queueing of traffic between Mytholmroyd and Sowerby Bridge, however due to the largely rural nature of the area car travel is typical.

## An emerging vision

**4.143** The only direct comment in relation to the proposed vision statement was an objection to the idea of an urban market development in Mytholmroyd. This is seen as unsuitable due to the proximity of other

town markets such as Hebden Bridge, Todmorden and Halifax.

**4.144** Indirect comments received to feed into the emerging vision statement include:

- Transport links need to be improved as a priority; and
- Green space provision should be sought to be in line with Natural England's Accessible Natural Greenspace Standards.

### Opportunities that exist

**4.145** Comments received in relation to the proposed opportunities included:

- More information on local housing need should be provided to enable residents to properly comment;
- Whilst alternative power needs to be explored, the council will need to be sure of the development risks and costs;

**4.146** Additional opportunities identified include:

- The sports centre could be developed more as a youth centre (car park currently underused); and
- The river/canal corridor should be considered as the major green infrastructure asset and opportunities taken to enhance the waterside environment for both people and wildlife. By maintaining a high quality environment along the route, there is an opportunity to promote active travel and minimise car use for short journeys.

**4.147** A general comment was received stating that, with the physical constraints to development found in such an area as Mytholmroyd/Luddendenfoot, aspirations need to be realistic and that not all desired facilities may be practical or feasible.

### Core Strategy Key Themes 26

The comments on the Mytholmroyd/Luddendenfoot section of the Core Strategy indicate a clear message that:

- Transport is an issue and needs to be improved/addressed through the LDF;
- An improved balance between addressing housing and employment needs is required;
- The ageing population needs to be considered more as part of the planning process;
- Green spaces should be provided to the appropriate standards;
- The opportunities identified for housing and alternative energy provision should be carefully considered;
- Additional opportunities include a youth centre in Mytholmroyd and capitalising on the river/canal corridor; and
- Expectations should be realistic due to the realities of the rural environment of the area.

**4.148** The comments on the Mytholmroyd/Luddendenfoot section of the Core Strategy highlight themes which require further investigation for possible inclusion in the next stage of consultation on the Core Strategy.

### Key Actions 21

- Consider how all the comments received (including from the area workshop) should be integrated into a revised vision and plan for the area; and
- Consider the need for any area specific policies for Mytholmroyd/Luddendenfoot.

## Ripponden/Rishworth/Barkisland

**4.149** A number of comments were received in relation to the Ripponden/Rishworth/Barkisland sub-area, the majority in relation to the vision element and potential opportunities that exist in the area. The following general issues were also raised by consultees:

- Any future development should ensure the protection of the South Pennine Moors area;
- Bus services should be improved to help ease congestion;
- Woodland areas should be expanded along with the enhancement of green space;
- The utilities infrastructure (sewerage and electricity supplies) should be investigated and/or upgraded before further development takes place;
- Schools are oversubscribed with limited capacity for rapid expansion;
- Amenities are very limited such as village halls, community centres and football pitches.
- Parking is a real issue with high reliance on private vehicles for travel to work and shopping. More control over car parking is required

### An emerging vision

**4.150** Comments received in relation to the emerging vision statement included:

- Support for the proposed vision for Ripponden;
- The vision should reference continued need for housing in Ripponden, reading '**Ripponden remains the primary location for housing, retail, employment and leisure facilities...**'; and
- Any development should meet local need and demand only due to the limited capacity of the highway network.

## Opportunities that exist

**4.151** Comments received in relation to the identified opportunities included:

- Support for a cycle path providing a link to neighbouring authorities as part of a wider strategic network, and improvements to footpaths to help increase tourism;
- Objection to the use of green field sites for development - development should be concentrated into urban areas - the countryside is an asset for tourism and for food production; and
- Inevitable need to release sustainable green belt land to accommodate the local needs of Ripponden throughout the Core Strategy plan period.

### Core Strategy Key Themes 27

The comments on the Ripponden/Rishworth/Barkisland section of the Core Strategy indicate a clear message that:

- Significant over development in recent years mean that, in the future, the area should only receive development that is necessary to meet local needs;
- Infrastructure is a major issue in the area, from oversubscribed schools and a lack of social facilities to overstretched sewerage and electricity networks;
- Transport is the other common theme from congestion on the roads to provision of improved public transport and sustainable travel modes such as cycle routes.

**4.152** The comments on the Ripponden/Rishworth/Barkisland section of the Core Strategy highlight themes which require further investigation for possible inclusion in the next stage of consultation on the Core Strategy.

### Key Actions 22

- Investigate infrastructure issues in the area with relevant infrastructure providers;
- Consider how all the comments received (including from the area workshop) should be integrated into a revised vision and plan for the area; and
- Consider the need for any area specific policies for Ripponden/Rishworth/Barkisland.

Ripponden



### Protected Moorland Areas

**4.153** The Protected Moorland Areas section did not attract a lot of comments. Those that did comment supported its identification and the ideas for peat restoration and carefully managed tourism. Comment was

also made upon the need to increase biodiversity and protection of adjoining moorland areas not covered by the European designations.

### Key Actions 23

- Support for tourism provided it is carefully managed;
- Need to consider protection of adjacent moorland not covered by European protection; and
- Support for identifying the area and vision.

Moorland





## 5 Objectives and Policy Options

### Introduction

**5.1** The Objectives and Policy Options document provided supporting information for the strategic objectives contained in the Core Strategy Refined Issues and Options document. Each objective was supported by potential policy options for the Core Strategy with the aim of meeting the relevant objective. Potential targets and indicators were also included for comment as they represented a possible monitoring framework.



**5.2** There were 445 separate comments made directly to this document from a range of individuals, groups and agents. The comments were wide-ranging with many conflicting views. The remainder of this chapter looks at the main themes and considerations for the Core Strategy.

### SO1 - Sustainable Development

**5.3** The consultation document offered the following objective concerning sustainable development: **"To follow the principles of sustainable development in the location and design of all new and refurbished development and associated infrastructure"**. There were few specific comments about the objective, those that were received recommended a reference to renewable energy was made, as this was felt to represent both an economic driver and a way to move towards zero carbon. Other comments indicated strong support for the proposed objective and the centrality of sustainable development. A general comment requested that all new build development should be at eco standard 4 with no exceptions.

## Core Strategy Key Themes 28

### Policy Option 1 - Sustainable Development

1. Sustainable development principles should be referenced and integrated into all individual policies in the Core Strategy, as appropriate, OR
2. A general, overarching sustainable development policy should be developed and included in the Core Strategy.

### Comments on Policy Options

#### Option 1

- The comments in favour of Option 1 included suggestions that it would allow for tailoring of individual policies which may be more appropriate than one overarching policy;
- It was argued that since tackling climate change is fundamental to the principles of sustainable development, strong policy support should be given to proposals in this sector;
- Others supported Option 1, although it was important as to how the policy would be worded and also how it would be applied;
- Some in favour of Option 1 felt that policies should still provide flexibility in relation to future development opportunities, and sustainability should not be a reason to hinder new development coming forward;

#### Option 2

- The majority of comments were in favour of Option 2;
- Those favouring Option 2 considered it would allow a more flexible approach to future development opportunities, whilst retaining the principle of sustainable development throughout the Core Strategy;



- Others suggested Option 2 set the right tone for developers and would allow a general overarching policy under which all other Core Strategy policies would sit;
- Another consultee considered Option 2 would be more appropriate in light of the government's intention to introduce a presumption in favour of sustainable development;
- More clarity was needed to establish what criteria would be applied in order to assess if the overarching policy was appropriate for a given policy.

## Alternative Option

- There were also comments suggesting a combination of the two policies would be the preferred option. This was because sustainability should be at the heart of all policies, but there needs to be an overarching sustainable development policy to guide all the other policies.
- Another comment in support of combining the policies suggested that as well as a general overarching policy, other policies should reference under an implementation and monitoring section how it will contribute to delivering sustainable development.

## Key Actions 24

- Consider how to adopt a flexible approach into an overarching policy;
- Consider how an overarching policy would be applied to other policies;
- Should reflect presumption in favour of sustainable development;
- Consider how to build sustainability into the heart of all policies;
- Important to set out how policies will contribute to delivering the objectives of sustainable development.

## SO2 - Climate Change

**5.4** The Consultation document suggested the following Climate Change Objective: "**To address the causes of climate change through reducing greenhouse gas emissions, whilst adapting to the impacts on Calderdale's environment, economy, and community**". Many of the comments were supportive of the general principles expressed by the objective, although some requested the objective be framed in a more positive way, with links to the 'zero carbon' economy and how renewable energy can reduce the cost of living. Some comments highlighted the Core Strategy's role in supporting other strategies, such as the emerging Climate Change Strategy, and how an emissions reduction target could drive all other Core Strategy policies. It was pointed out that any indicators or targets need to be up to date.

## Core Strategy Key Themes 29

### Core Strategy Objective SO2 - Climate Change

- The Objective should be framed in a positive way;
- The Objective should refer to a 'Zero Carbon Economy';
- The Objective should reflect how Renewable energy can reduce the cost of living.

## Policy Option 2 - Reducing emissions - Encouraging the use of sustainable modes of transport.

**5.5** Responses to this policy option concentrated on walking and cycling, public transport, transport infrastructure, travel plans, and location of new development. Comments on cycling emphasised the need to build routes to a recognised standard, and to encourage commuting by bike, the fastest and most convenient routes should be followed - generally on or alongside roads. Cycle routes separated from the road network are more attractive to leisure cyclists. Public transport was felt to be an alternative to the car

# 56 Objectives and Policy Options

5

Calderdale MBC - September 11 Refined Issues and Options Feedback

for longer journeys, whilst walking and cycling should be viewed as ways to travel for part of an overall journey, rather than for the whole journey. The health benefits associated with walking and cycling was highlighted, not only in relation to reducing the number of cars and therefore emissions, but for people's physical health as well. It was suggested that large development sites would provide the demand that would allow diversion or extending of bus routes. Park and Ride schemes received a level of support, but care would need to be taken in locating the site in order to avoid increased congestion and traffic levels on routes to and from the Park and Ride site.

**5.6** Support was expressed for the extension and enhancement of Green Infrastructure to link in with existing walking and cycling routes. It was considered important to make the best use of existing transport infrastructure and capacity, for instance the role train stations could play in promoting walking and cycling in the valley bottoms. Reference was made to a recent relaxation of parking standards in terms of residential development. Some consultees requested that more detail be provided on the proposed requirement for developments to promote the use of Green Infrastructure. The Highways Agency expressed concern that walking and cycling infrastructure should pass safely through road junctions, as well as ensuring junctions continued to operate efficiently without causing tail backs.

**5.7** The Highways Agency stressed that any travel plan thresholds relating to sites potentially impacting on the Strategic Road Network will need to be agreed with them. Other objectors considered travel plans to be an unnecessary requirement on development within settlements or on allocated sites, as the cumulative impacts of a large number of smaller sites can be just as great as a single large site; an alternative suggestion was to require a travel plan on all development outside of a defined distance from say, a town centre or train station. Another consultee felt more detail was required in order to comment on travel plan thresholds, and it was questioned as to how travel plans will be monitored and enforced.

**5.8** Although support was expressed for locating development in accessible locations that make non car travel easier, it was pointed out

that this may not be realistic in rural areas. Electric vehicles powered by locally generated electricity should be promoted, and new developments should be built with these in mind. It was suggested that electric vehicles could benefit rural areas as well. It was considered that national planning policy now recognised development should be considered appropriate in terms of the use in its setting, rather than in relation to accessibility.

**5.9** Other comments pointed to the value of existing commercial/ industrial sites outside of the major centres which are sustainable by virtue of the processes and operations on site, rather than focusing solely on sustainable locations. Some responses proposed specific locations would create development in accessible locations, for example south of Hipperholme crossroads. The Council was encouraged to avoid locating employment development alongside Motorways, due to the resulting emissions and addition strain on the Road Network.

## Core Strategy Key Themes 30

### Policy Option 2 - Reducing emissions - encouraging the use of Sustainable Transport - Feedback

#### Walking and Cycling:

- Routes should be built to a recognised standard, Commuters and leisure cyclists have different needs;
- Should be viewed as forming part of the overall journey;
- Train stations can promote walking and cycling routes along the valley bottoms;

#### Public Transport:

- Needs to be a stronger emphasis on Public Transport for longer trips;

- Larger sites may allow diversion or extension of bus routes;
- Support for Park and Ride schemes, but need to avoid congestion around the site;

## Infrastructure

- Make the best use of existing transport infrastructure;
- Green Infrastructure should be extended and enhanced;
- Parking standards are no longer as restrictive for new development;

## Travel Plans

- More detail is needed on thresholds and the requirements for promoting Green Infrastructure;
- The impacts of a large number of smaller sites can be just as great as a single large site;
- Travel plans are an unnecessary requirement on development;
- Thresholds should be based on distance from locations rather than the size of a site;
- Any thresholds relating to travel plans need to be discussed with the Highways Agency;
- How will travel plans be enforced and monitored?

## Location

- New development needs to be located in accessible areas;
- Sustainable transport not always realistic in rural areas,
- A business which contributes to sustainable development is of just as much value as an accessible location

## Alternative policy options were suggested:

- ***"New developments (residential and non residential) should be required to submit travel plans proposing sustainable solutions if areas are not currently served well by public***

***transport; this should include the promotion of green infrastructure to make walking and cycling more attractive."***

## Key Actions 25

### Walking / Cycling

- Policy needs to recognise different needs of users of walking cycling routes and how to encourage these as part of the overall journey;

### Public Transport

- Investigate ways policy can help improve public transport;

### Infrastructure

- Policy needs to make the best use of existing infrastructure;
- Consider how to extend and enhance Green Infrastructure;

### Travel Plans

- Consider how to develop a threshold;
- Develop a method for enforcement and monitoring.

### Location

- Policies should direct development to accessible locations;
- Policy needs to consider the contribution a development makes towards sustainable development wherever it is located;

### Alternatives

- Consider alternative policy proposed.

# 58 Objectives and Policy Options

5

Calderdale MBC - September 11 Refined Issues and Options Feedback

## Reducing Emissions - Energy Efficient New Development - Policy Option 3

**5.10** There was a slight number in favour of having a policy in line with building regulations, as it was felt by some to be unreasonable to require development to achieve targets over and above national ones, which could also create viability and deliverability issues. However there was support for encouraging new residential development to aim for higher levels of energy efficiency prior to 2016 (the target date for zero carbon level 6 CSH), with reference made to the quantity of lifetime emissions associated with energy use from new developments, and the need to move to a zero carbon or carbon positive buildings and development.

**5.11** The negative impact zero carbon buildings can have on biodiversity was pointed out (reduced nesting and roosting opportunities) and that policies for zero carbon buildings should reflect this impact. Local targets should be developed for reducing emissions, and it was recommended the policy should require a minimum of BREEAM 'Very Good' standards, and the relevant indicator should be amended to read 'new non-residential developments' rather than 'new commercial developments'. It was felt the policy should refer to Air Quality, and the need to avoid residential development near the M62. There was concern about a lack of reference to water efficiency alongside energy efficiency, and a commitment needs to be made to delivering high standards of water as well as energy efficiency in new homes. It was recommended that the policy be informed by the Environment Agency's Water Resources Strategy.

### Core Strategy Key Themes 31

#### Policy Option 3 Reducing Emissions - Energy Efficient New Development - Feedback

##### Levels of Energy Efficiency

- Energy efficiency policies should be in line with building regulations;
- Aiming for energy efficiency over and above national standards could lead to viability and deliverability issues;
- The policy should aim for achievement of BREEAM 'Very Good Standard'

#### Biodiversity

- Zero Carbon development can have a negative impact on biodiversity;

#### Targets

- Emissions targets should be developed locally;

#### Other Matters

- The policy should include reference to Air Quality;
- The policy should include reference to Water efficiency.

### Key Actions 26

- Consider impact of adopting a policy over and above building regs;
- Investigate impact zero carbon development has on biodiversity;
- Develop a local target;
- Consider Water Efficiency and Air Quality;

## Policy Option 4 - Reducing Emissions (RE) - Generation of Renewable and Low Carbon (RLC) Energy

**5.12** Some felt all elements apart from the 'Areas of Search' would place an unduly onerous burden on the development industry. The policy option

should also link in with the emerging Climate Change Strategy. Concerns were voiced as to how wind turbines could lead to soil erosion and degradation of peat, and also long term damage to peat bogs.

**5.13** Locally achievable targets relating to renewable and low carbon energy generation should be developed, whilst others felt any proposed targets should be higher. There was opposition to the targets and requirement for certain levels of RLC generation, since it was argued these were out of line with emerging guidance on carbon reduction. Any targets should distinguish between RE and LC sources, and be clear as to exactly what decentralised energy supply actually means.

**5.14** Support was evident for lower thresholds to which a policy requiring RLC on site generation would apply, and to restrict inefficient RE technologies. It was suggested the policy include measures to improve energy efficiency, as sometimes RLC generation may not be viable. Additionally, comment was made concerning the role that design of development can play in reducing emissions. Other consultees felt thresholds would not work, and the policy should require all development to include on site RLC generation.

**5.15** It was important to recognise the value that trees and woodland provide in mitigating climate change, acting as a carbon sink and reducing carbon emissions in other ways, such as sustainable construction, as well as helping prevent flooding. It was requested that the Core Strategy included a commitment to substantial woodland creation.

**5.16** Some consultees were concerned about the potential impact wind farms can have on tourism as well as concerns over the safety of the wind turbines themselves. It was suggested that hydro power should be the focus for generating renewable energy in Calderdale.

**5.17** The 'Area of Search' would give indication as to where RE would be considered, whilst objectors felt it could lead to a presumption in favour of wind turbine development and blight the upland areas. Cumulative impact, the impacts that different types of wind turbines can have in the landscape, the height of turbines, as well as siting issues were all

mentioned. Concern was evident over the lack of a policy for domestic wind turbines, and a presumption against the taller turbines in Special Landscape Areas was requested. Policies should make clear that landowners are responsible for removing turbines. It was considered the LDF is actively promoting any type of RE at the cost of protecting the landscape. The capacity and character of the landscape was important, as well as ecological and geophysical constraints. The need to consult the Civil Aviation Authority and MOD was also highlighted.

**5.18** It was suggested the LDF should focus on Biomass, CHP, and EfW power, and support was evident for on site RE generation on existing industrial / commercial sites. The role that waste management and recycling can play in RLC energy generation was mentioned, and such sites capable of accommodating such technology should be identified. The third element of the policy was felt by some to offer a 'get out clause' for developers, and any RE policy should refer to Community led RE schemes as being viewed favourably.

### Core Strategy Key Themes 32

#### Policy Option 4 - Reducing Emissions - Generation of Renewable and Low Carbon Energy - Feedback

##### Environmental Impact

- Impact on Landscapes;
- Landscape character assessment should inform policies;
- Any policy should work within ecological and geophysical limits;
- Impact on Tourism;
- Safety issues of Wind Turbines;
- Woodland creation vital to reducing emissions and providing a fuel resource.



## Targets / Thresholds

- Targets should be locally developed;
- Proposed targets should be higher;
- Proposed targets and thresholds are based on outdated guidance;
- Any targets should distinguish between Renewable and Low Carbon energy;
- Targets should apply to all development.

## Area of Search

- Would result in a presumption in favour of wind farm development;
- Proposals should be assessed on a case by case basis;
- Cumulative impact not taken into account;
- Ignores local opinion;
- Should be a policy for domestic wind turbines;
- No wind turbines should be allowed within Special Landscape Areas;
- Policy would give direction as to where renewable energy would be worth exploring.

## Alternative Policies

- ***"The core Strategy should set out 'Areas of Search' in the upland areas of Calderdale that offer the greatest potential for wind power developments and take into account the impact that such developments have on biodiversity and landscape character. The cumulative impact of single turbines should also be taken into account. Any such designation should not rule out alternative types of renewable energy within these areas taking into account the same considerations"***
- ***"The Core Strategy should encourage a range of renewable energy installations, focusing on Biomass, CHP and EfW."***

***Proposals for on site renewable energy generation on existing industrial and commercial sites should be strongly supported as generating energy at the point of use is the most sustainable form of generation. Synergies should be achieved between Waste management, Recycling, and Renewable energy policies. Existing sites capable of accommodating such technology should be identified and promoted"***

- Any policy should include the statement ***"Community led schemes for renewable energy installations will be viewed favourably"***
- The renewable energy policy should read ***"Calderdale's topography, heritage, and tourism means the focus should be on attractive and interesting hydro-generation"***.

## Key Actions 27

### Environmental Impact

- Consider if the policy should be informed by landscape character assessment;
- Consider policies that encourage woodland creation;

### Targets / Thresholds

- Develop local targets;
- Distinguish between Renewable and Low Carbon targets;

### Area of Search

- Carry out further work on an 'Area of Search' policy
- Consider how to address individual circumstances of proposals;
- Ensure cumulative impact is addressed;
- Need to ensure policy considers all different technologies;

## Alternatives

- Consider alternatives proposed.

## Policy Option 5 - Adapting to Climate Change - Flood Risk Management.

**5.19** Some consultees felt that this option was irrelevant as the issues it deals with have now been superseded by provision in the Flood and Water Management Act. Other consultees felt that this option went beyond the requirements of Planning Policy Statement 25: Flooding and what might reasonably be required by the Environment Agency.

**5.20** The Environment Agency, however, felt that all of the proposed options should be incorporated into Policy Option 5 as flood risk cannot be managed through one of the policy options alone. The Environment Agency went on to state that 'Your flood risk management policy should also support the aims and objectives of PPS25 in seeking to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas at highest risk'.

## Core Strategy Key Themes 33

### Policy Option 5 Adapting to Climate Change - Flood Risk Management - Feedback

#### SUDS

- Biodiversity can be enhanced with appropriately designed SUDS systems;
- Native woodland creation as part of SUDS can reduce surface run-off and retain pollutants on brownfield sites.

#### Flood Resilient Design

- New build that allows for flooding;
- Green Roofs and permeable paving;
- Culverting or building over watercourses should not be supported.

### Opportunity to Utilise Areas for Flood Risk Management

- River floodplains should be restored to reduce flooding downstream;
- Creation/restoration of floodplain woodland to alleviate, and slow the rate of flooding.

### Mix of Options

- All options could/should be included.

### Other Matters

- Section should be sub-divided into 'Flood Risk Management' and 'Water Management' so that aspects of water management to include water resources and water quality are covered.

### Alternative Policies

- "Identify opportunities to utilise areas for flood risk management to include restoration of the natural flood plain to its original function, but also promote flood risk management in other areas, for example retention of water on moorland and wet woodland to manage water flow"*

## Key Actions 28

Include all 5 options in Flood Risk Management policy. Policy Option to cover Water Management as well as Flood Risk Management.

# 62 Objectives and Policy Options

5

Calderdale MBC - September 11 Refined Issues and Options Feedback

## Policy Option 6 - Adapting to Climate Change - Urban Design

**5.21** This option was considered by some as an opportunity to link an Urban Design policy to managing flood risk, and identify areas which could be opened up and used for flood storage. It was pointed out the indicator suggested is no longer required by government. It was suggested there should be a reference to 'Green Roofs', which play a role in the energy efficiency of buildings and also provide opportunities for biodiversity. Another comment highlighted the role that green space and trees can play in adapting to climate change; for example providing shade in summer and allowing solar gain to buildings during winter. Trees and woodland can also reduce the impact of the 'urban heat island effect', and improve air quality.

**5.22** There was concern over the lack of clarity in relation to this policy option and what it was trying to achieve, and fears over the potential financial burden that such a policy may place on developers. This theme was continued by comments relating to the feasibility and viability of a policy requiring developers to incorporate adaptation measures, and that it was unnecessary due to the increasing requirements of the Building Regulations and the Code for Sustainable Homes. Another objection felt the policy approach that would be more suited to a warm, dry, climate rather than the wet, cold one that exists in Calderdale. The element which refers to Environmental Impact Assessments (EIA) was considered to both lack clarity and repeating legislation that already exists in relation to EIA. Alternative policy options were suggested concerning local distinctiveness, protection, enhancement and access to the natural environment, and energy efficiency.

### Core Strategy Key Themes 34

#### Policy Option 6 - Adapting to Climate Change Through Urban Design

#### Flood Risk

- Opportunity to link in with flood risk management;
- Identify areas with potential for flood water storage;

#### Indicators / Monitoring

- New indicators required;

#### Green Infrastructure

- Trees can reduce urban heat island effect and improve air quality;

#### Lack of Clarity

- Policy would be a burden of developers;
- What exactly is the policy trying to achieve?
- Policy isn't viable or feasible;
- Unnecessary policy, repeats existing legislation;
- Policy more suited to a warm, dry climate;

#### Alternative Policies

- The policy should include a reference to Green Roofs;
- Alternative policy wording suggested:
  - ***"The design of development should enhance the distinctiveness of the local environment and the local buildings, settlements and wider landscape character;***
  - ***The design of development should protect and enhance natural resources, support natural ecosystems and incorporate beneficial biodiversity features;***
  - ***The design of development should promote access to and enjoyment of the natural environment;***
  - ***The design of development should include measures to mitigate and adapt to climate change and encourage the efficient use of energy and other resources."***

## Key Actions 29

- Consider a policy that links in to flood risk management;
- Establish new indicators for monitoring;
- Consider positive impact Green Infrastructure can have;
- Future policy options need to be clear about what the policy is trying to achieve, and avoid repeating existing legislation;
- Consider alternatives suggested.

## Policy Option 7 - Adapting to Climate Change - Biodiversity

**5.23** Some feedback appreciated the consideration of biodiversity in relation to climate change, although it was requested that it was made clear that climate change can lead to a reduction in the numbers of species, as well as gaining some new ones. The impacts associated with peat drying out, with resulting issues on water quality and flood risk were mentioned, as was the need to refer to rivers as another habitat that will alter due to climate change.

**5.24** The joining up of existing, and creation of new wildlife sites was considered to be a vital aspect of the Council's work in conserving biodiversity, and that it will be necessary to have ecological expertise to ensure biodiversity opportunities are identified and pursued through the LDF. Support was evident for a flexible policy approach, although this was countered by concerns this would be open to interpretation and a stronger policy statement is needed. The concept of biodiversity webs connecting all green spaces in Calderdale was proposed, with the ultimate aim of free migration of flora and fauna. Other approaches throughout the world that consider climate change, biodiversity and a carbon positive future should be reviewed.

**5.25** Consultees felt the LDF has a role to play in protecting areas which have the potential for enhancing biodiversity and connecting habitats, creating new areas of biodiversity value, protecting existing areas of high

biodiversity value, and restoring degraded habitats. 'Buffer zones' for designated sites should also be included.

**5.26** The indicator relating to the conditions of SSSI was felt misleading, as it is not based on the ability of biodiversity to adapt to climate change. The role of trees and woodlands was highlighted, for example linking habitats to support wildlife. Some consultees referred to the UK Low Carbon Transition Plan which required woodland creation policies to "continue to respect the benefits and demands of landscape, biodiversity and food security". One proposal was to aim to develop Green Infrastructure, increasing tree cover and investment in the management of trees. The importance of including a robust wildlife corridor policy in the LDF was stressed, alongside a relevant wildlife corridor indicator or target. As some comments pointed out, the need to secure biodiversity adaptation gains through the planning system should be incorporated into a package of Green Infrastructure aspirations, given how compatible they are.

## Core Strategy Key Themes 35

### Policy Option 7 - Adapting to Climate Change - Biodiversity - Feedback

#### Habitat

- Climate can reduce the number of existing species as well as increasing new ones;
- Rivers are another habitat that will be affected;
- Impacts associated to peat drying;
- Adapt to climate change by reducing fragmented habitats;
- Joining up of existing and new habitats is vital;

#### Policy approach

- The ultimate aim is the free movement of flora and fauna;
- There should be a buffer zone around designated sites;

# 64 Objectives and Policy Options

5

Calderdale MBC - September 11 Refined Issues and Options Feedback

- Vital to protect areas of high biodiversity value;
- Important to restore degraded areas;
- The LDF is relevant to existing high biodiversity value areas and the creation of new areas;

## Targets / Indicators

- SSSI indicator not relevant to this policy option;
- Need indicator / target in relation to Wildlife Corridors;

## Green Infrastructure

- Role of trees and woodland emphasised;
- Overall aim in relation to this policy option should be to develop Green Infrastructure;
- The LDF should protect and enhance biodiversity within a package of Green Infrastructure aspirations;

## Alternatives

- *"An identified approach to biodiversity protection and enhancement should be required in relation to the impacts of climate change, recognising that the exact impacts are not always fully understood. The same approach should be adopted for wider landscapes (both rural and urban) to promote the creation, enhancement and management of green infrastructure to link our open spaces to create wildlife corridors."*

## Key Actions 30

- Consider how policies can address the potential impacts on habitats;

- Future policy should aim to protect existing areas of high biodiversity value and create new ones;
- Aim to develop a policy that helps deliver a 'joined up' Green Infrastructure network;
- Consider how policy can reflect importance of trees and woodland;
- Establish relevant monitoring indicators;
- Consider alternatives suggested.

## SO3 - Economy and Enterprise

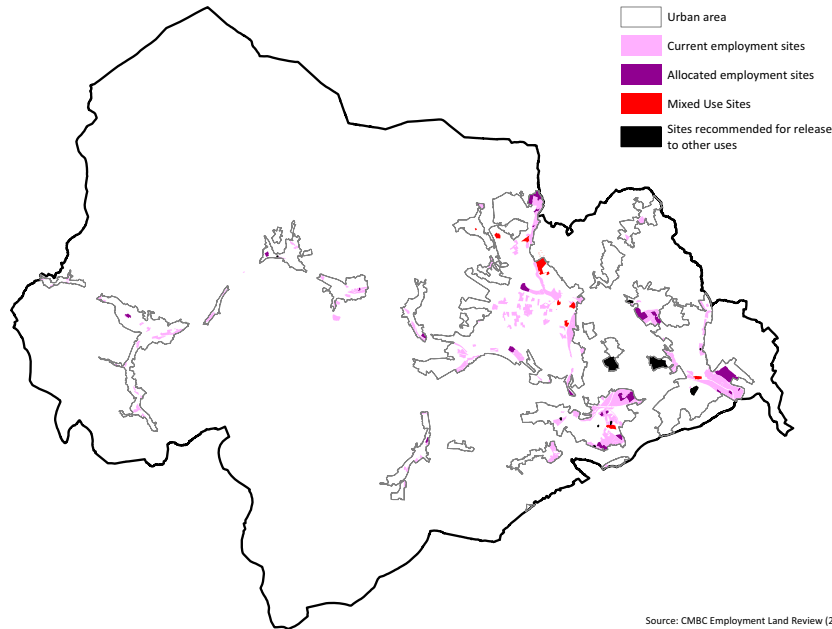
**5.27** The consultation document suggested the following objective for Economy and Enterprise: **"Create a resilient sustainable economy founded upon innovation and enterprise; building on the location and exceptional character of Calderdale"**. There were few comments about the actual objective, however, it does appear to be generally supported.

**Policy Option 8 - Provide a supply of readily available employment land and premises in accessible locations to fulfil the needs of current and future employers in Calderdale**

**5.28** The majority of comments focused on the need or otherwise for new employment land within Calderdale. The comments often created conflicting views with some recommending future policy should protect existing employment sites and allocations as well as provide new allocations to help retain businesses who need to expand and re-invigorate the area by bringing in new wealth and jobs. Others considered a more flexible approach was required releasing existing sites, particularly those currently constrained, to other uses and reducing our overall portfolio of employment land in line with the recommendations of the Regional Spatial Strategy.



**Map 5.1 Employment land sites and allocations in Calderdale (ELR 2008)**



**5.29** Other general comments included providing new sites for manufacturing near the motorway, opposing new land near the motorway as it would encourage commuting and contribute to pollution, need to improve and promote offices and other employment in our town centres, the upper valley areas and Halifax should be promoted as areas for service industries and the need to work closely with business to identify their needs.

## Core Strategy Key Themes 36

**Policy Option 8 - Provide a supply of readily available employment land and premises in accessible locations to fulfil the needs of current and future employers in Calderdale**

There was both agreement and objection to almost all the potential

policy options identified

### Protecting existing sites and allocations from development

- Retain constrained allocations because topography of Calderdale means there is limited choice; and
- Retain existing sites to reduce further out-commuting.

### Release existing sites and identify areas of search for new sites

- Focus on our town centres;
- Release Todmorden sites and promote growth in digital industries to link with Salford through town centre office development;
- Marginal sites with limited access should be released; and
- Disagreement due to limited scope for new sites in Calderdale.

### Protect the best employment sites and provide areas of search for new sites

- Retain the best sites and release those not fit for modern employment uses;
- Release the sites identified as being constrained in the ELR; and
- General disagreement to this option from some although reasons not identified.

### Improve access to employment opportunities outside the district

- Support providing it is accessed by sustainable means;
- Ensure close to population centres; and
- Concern may lead to out-commuting putting strain on motorway network.

### Work with neighbouring authorities to provide sub-regional opportunities/ sites

- May lead to out-commuting putting strain on motorway network;

# 66 Objectives and Policy Options

5

Calderdale MBC - September 11 Refined Issues and Options Feedback

- May lead to businesses being 'poached' from Calderdale; and
- Will increase commuting and associated pollution.

## **Provide 15% more than forecasts predict to enable flexibility in the plan**

- Concern how this will be managed as may just lead to most accessible sites to motorway being developed first.

### **Alternatives;**

- Expanding existing large employment areas; and
- Provide greater opportunities for home-working.

## **Key Actions 31**

- Re-consider likely employment land requirements based upon the most up to date employment projections;
- Build upon work of the ELR by identifying the cost and possible funding for bringing forward constrained RCUDP sites;
- Consider introducing a phasing policy for the release of sites to maintain flexibility but also manage supply/ demand;
- Identify opportunities for improving access (via sustainable means) to employment opportunities both within and outside Calderdale; and
- Consider potential to extend existing employment allocations.

## **Policy Option 9 - Work collaboratively with business to encourage innovation and diversification of both the rural and urban economies**

**5.30** This policy was widely supported, it was suggested a framework which assists owners and developers to develop existing unsuitable sites into modern business premises is required. Other comments suggested

a need for an increased university presence in Calderdale to promote innovation.

## **Core Strategy Key Themes 37**

### **Policy Option 9 - Work collaboratively with business to encourage innovation and diversification of both the rural and urban economies**

There was general agreement to most of the potential policy options, the main comments are included below:

#### **Promote and allocate new business locations in East Calderdale and promote Halifax as the prime office location**

- There is a need for new employment space in Todmorden due to its remoteness from other centres

#### **Promote rural diversification, particularly in west Calderdale**

- Support but needs to be for all Calderdale;
- Needs to allow expansion of rural businesses, facilitate entrepreneurial activity, allow home-working and accessibility to business support; and
- Importance of the environment to the economy through tourism and attractiveness to inward investment needs recognising.

#### **Provide a flexible approach to employment allocations and sites, allowing a wide range of employment generating uses**

- Agree policies should not be too restrictive;
- Only restrict uses where necessary - use criteria based policies to control; and
- Allow mixed-use including housing;

#### **Provide a positive framework for start-up accommodation**

- Small start-up units required in western Calderdale.

## **Provide positive framework to encourage tourism and tourism related facilities**

- Hotels required in western Calderdale.

## **Promote opportunities to work from home in new housing developments**

- General support; and
- Ensure not formal live/ work units (difficult to mortgage), provide flexible space that can be used for home-working.

## **Key Actions 32**

- Encourage rural diversification across all Calderdale;
- Provide a policy framework to assist the start-up of new enterprises, through home-working and conversion of existing premises, within Calderdale;
- Provide a positive policy framework to support an expanding tourism industry; and
- Assess how infrastructure can be improved to promote home working (broadband availability).

## **Policy Option 10 - Create vibrant, lively town centres - retail hierarchy**

**5.31** The following general comments were received in relation to this section of the document, unrelated to the specific policy option:

- Integrate health awareness and consider opportunities to increase physical activity as people move around town centres; and
- There are too many small retail units at present in our town centres.

**5.32** The majority of comments received in relation to the retail hierarchy of Calderdale supported the strengthening of all of the existing town centres, as opposed to focusing on specific centres only.

## **Core Strategy Key Themes 38**

### **Policy Option 10 - Create vibrant, lively town centres - retail hierarchy**

Support was lodged for developing both the proposed policy options, and an alternative option was also put forward. No objections were noted;

### **Option 1 - Maintain and strengthen the current role of all existing town centres**

- A new retail centre in Hipperholme would support housing growth in the area; and
- For those towns with a historic core, it is important that they are economically successful to reduce underused, poorly maintained or vacant heritage assets.

### **Option 2 - Enhance or decrease the role of a specific town centre in relation to the current retail hierarchy**

- Elland, in particular, is considered to be a town that would benefit from an improved retail offer.

### **Alternatives;**

- Increase economic activity through varied, smaller units - supermarkets suppress smaller traders.

## Key Actions 33

- Update the Calderdale Retail Needs Assessment with the latest population projections and expenditure growth forecasts;
- Determine the proposed retail hierarchy for taking forward in the LDF;
- Look in detail at the composition of town centres in terms of unit size, independence etc. with the aim of identifying centre characteristics to address through planning policy in the LDF;
- Investigate locally important impacts on centres which should be tested against retail applications in line with PPS4; and
- Investigate potential floorspace thresholds for centres which should be subject to impact assessments in line with PPS4.

## Policy Option 11 - Create vibrant, lively town centres - retail uses

**5.33** Very limited comments were received under this section. The comments that were submitted indicated that a combination of the options presented would be best to help create and reinforce vibrant lively town centres across the whole plan area. Comments supported the development of independent retailers who have been better able to weather the economic downturn and are more likely to support other local businesses. Support was also indicated for reducing the number of fast food outlets.

**5.34** Comments stated that the policy options developed should be centre-specific to help best achieve the vision for each individual place.

## Key Actions 34

- Identify centre-specific issues that may lead policy development, through the vision development for each town centre;

- Investigate how independent retailers and local produce may be incorporated into policy; and
- Investigate options for protecting local neighbourhood shops from closure.

## Policy Option 12 - Create vibrant, lively town centres - other town centre uses

**5.35** Most comments received to this policy option support Halifax and Brighouse as being the focus for other town centre uses.

## Core Strategy Key Themes 39

### Policy Option 12 - Create vibrant, lively town centres - other town centre uses

#### Option 1 - Encourage the majority of opportunities within and around Halifax and Brighouse town centre

- Larger more commercial opportunities should be sited in these town centres;
- Facilities likely to attract large numbers of visitors should be clustered within Halifax and Brighouse and be part of a successful mixed-use environment;
- This option aligns with RSS;
- Brighouse at the moment has little non-retail town centre use which needs to be encouraged and supported; and
- Emphasis should be on diversification and quality rather than quantity.

#### Option 2 - Encourage a wider dispersal of opportunities across all town centres

- Existing locally important community and cultural facilities should be protected and enhanced. Loss of facilities should be resisted unless it can be demonstrated that it is no longer needed or it can be established that services can be equally accessible and provided at an alternative location;
- Smaller town and district centres to provide facilities of an appropriate scale and kind to serve their roles and catchments;
- Policy should allow new development in all town centres where there might be demand and where it may facilitate more attractive and vibrant town centres; and
- This option would minimise travel and therefore congestion.

## Key Actions 35

- Develop a policy framework to incorporate comments above.

### Policy Option 13 - Create vibrant, lively town centres - improving quality

**5.36** Support was noted for all potential policy considerations under Policy Option 13 with further suggestions put forward.

## Core Strategy Key Themes 40

### Policy Option 13 - Create vibrant, lively town centres - improving quality

- All options are relevant with general support;
- Option 1 should state '*sustainable*' transport policies;

- Option 8, the transition from the day to night economy, can be overemphasised and can cause adverse impacts; and
- Options 2, 3, 5, 7 & 8 apply to all Calderdale's towns. The remaining options will be dependent on the strategy for each centre as to which will be best able to deliver a vibrant, successful town centre.

### Alternatives;

- Refurbish and re-use buildings before considering new-build;
- Green infrastructure should be part of the options for improving town centres;
- Making space for water, accessibility to a clean water environment brings many economic and social benefits;
- More shop mobility schemes in town centres not just Halifax;
- Encourage workers on outskirts of towns to shop in centre by means of free parking and incentive schemes.

Comments received on specific town centres related to Brighouse and Halifax only:

- Halifax has too many small shop units unfit for modern retailers' needs;
- Urban planting needed in Brighouse town centre; and
- Brighouse needs to develop more shared street space for socialising and relaxation to encourage more leisure events.

## Key Actions 36

- Consider most appropriate policy framework to incorporate quality objectives for town centres



## Policy Option 14 - Provide employment opportunities for all

**5.37** Only a limited number of comments were received for this section, however all supported the general policy ideas of locating employment opportunities either within or easily accessible to 'deprived' communities. There was support for regeneration and the provision of training within or close to 'deprived' communities. An alternative approach suggested was to support proposals from existing major employers in Calderdale.

### Key Actions 37

- Identify locations where new employment opportunities may be viable within or easily accessible from areas of high deprivation;
- Identify opportunities to raise skills in or accessible from areas of high deprivation; and
- Provide a framework to support the regeneration within areas of high deprivation.

## Policy Option 15 - Development of a low carbon economy

**5.38** Only a limited number of comments were received for this section, however all supported the policy idea. Indeed some suggested it should be the main policy for this section, others suggested the policy should be widened to include renewable energy and sustainable procurement.

### Key Actions 38

- Consider developing the policy to include renewable energy.

## SO4 - Housing

**5.39** Strategic Objective SO4 - Housing seeks: **"To meet the housing**

**needs of all by delivering the Regional Spatial Strategy Housing Requirement through the provision of a range of good quality dwellings of varying types, sizes and prices in sustainable locations utilising sustainable building methods and maximising the use of previously developed land, together with more efficient use and improvement of the existing housing stock."**

**5.40** Comments were not generally made in relation to the overall strategic objective as such but rather to the 5 sub-objectives emanating from this overall strategic objective.

## Housing Numbers Including Delivering the RSS Housing Requirement

**5.41** A range of views were put forward in relation to the appropriate housing requirement figure for the district. Concerns were expressed about the environmental implications of housing growth and the justification for such growth. Others supported planning for a higher number of dwellings than the RSS housing requirement in order to allow for a degree of flexibility. A clear theme was the proposed abolition of RSS and the need for the district to determine its own housing requirement figure and take into account its Growth Point status.

### Core Strategy Key Themes 41

#### Policy Option 16 - Housing numbers including delivering the RSS housing requirement

##### *Plan only for housing levels required by RSS and New Growth Point (NGP) status*

- RSS is to be abolished and the Council need to find alternative ways of formulating the housing requirement;
- The RSS figure of 670 dwellings equates to two Sowerby Bridges and does not make sense in a district with Calderdale's topography. The Council should oppose government targets and discourage migration to Calderdale.

## ***Plan for more housing than required in RSS/NGP to future proof the Core Strategy***

- Option 2 supported - population is increasing and NGP status requires delivery above RSS levels;
- New housing provision should support economic growth;
- Support Option 2 including to provide sufficient land to enable more family housing with adequate space;
- An allowance should be made for any undersupply in recent delivery due to the recession and slump in demand;
- Option 2 supported given RSS is to be abolished and in planning its own requirement sufficient land should be allocated to allow for flexibility. Credible and robust evidence base for RSS requirement figure as a minimum target but make clear this is not a ceiling including ensuring adequate reference to growth point status of Calderdale;
- NGP status demonstrates acknowledged housing need in Calderdale within Leeds City Region in an area of strong demand well related to Leeds and Bradford;
- Hipperholme contains a significant area of previously developed land including land allocated for employment which would save green belt land elsewhere and reduce pressure on Halifax and Brighouse. This is a sustainable location, could assist with affordable homes provision and fund A58/A644 junction improvements and the wider benefits this would bring.

## ***Alternative Suggestions and Other Comments***

- Bearing in mind the need to achieve a balance between housing and environmental issues an economical approach to land supply should be followed thereby assisting in not developing large areas of green belt;
- Need to adhere to RSS until abolished but also having regard to PINS advice following Cala Homes decision and anticipated Government paper 'a new approach to housing supply'

- The Council will also have to determine its approach to the new Homes Bonus and Community Infrastructure Levy in order to secure maximum benefits;
- SHMA does not determine housing requirement and once completed Council should consult on basis for housing requirement prior to progressing to Preferred Option;
- What is the point of brownfield planning permissions which are not implemented?
- Evidence base does not provide adequate basis for comment as no SHMA yet and 'Objectives and Policy Options' text does not address complexity of issues surrounding housing land supply.

## **Key Actions 39**

- Determine the housing requirement figure for the district ensuring it is supported by a sound evidence base and robustly test alternatives including specific consultation prior to the Preferred Options stage. Include relationships with the economy, any suppressed delivery during the recession and outputs from the completed SHMA;
- Update the implications of New Growth Point status given recent Government changes.
- Progress work on Community Infrastructure Levy;
- Maintain a watching brief on advice in relation to determining housing requirement figures from the Coalition Government.

## **Location of Housing Development**

**5.42** The consultation document outlined the main principles to be followed in locating new housing based on national planning guidance set down in PPS3 Housing. It also commented on the findings of the SHLAA and the possible need to seek land in the green belt whilst balancing this

# 72 Objectives and Policy Options

5

Calderdale MBC - September 11 Refined Issues and Options Feedback

against the need to prioritise the use of previously developed land. No specific policy options were proposed for this particular sub-objective within the Objectives and Policy Options consultation document as locational issues for housing cannot be isolated from other forms of development and the broad location of growth is therefore addressed in the Core Strategy Refined Issues and Options consultation document (Section 4: Possible Approaches).

**5.43** Comments in relation to the contextual text regarding the location of housing development ranged from being more explicit about the need to amend the green belt boundary to not using green belt or greenfield land at all. There was support for the use of previously developed land (pdl) but also greenfield sites in sustainable locations immediately adjacent urban areas. A number of comments referred to the need to adequately take account of infrastructure requirements.

## Core Strategy Key Themes 42

### Location of Housing Development

- Need to support sustainable and accessible sites whilst recognising constraints on sites in the Upper Valley welcomed;
- Is the expansion of Todmorden a realistic option and if not why is it retained in the consultation document?
- Priority to pdl but mention should be made of sustainable greenfield sites in accessible and sustainable locations immediately adjacent to urban areas;
- Strong objection to use of green belt and greenfield sites;
- Support approach of seeking to accommodate housing beyond current settlement boundary in green belt and an appropriately worded policy regarding green belt amendments should be included in the Core Strategy;
- Consider the need for additional safeguarded land;

- Routes to destinations should be designed to involve a level of physical activity with open space including communal gardens for growing vegetables;
- Housing, especially above RSS levels would be a concern in relation to the road network and would need increased levels of employment opportunities as well;
- Location needs to take account of water infrastructure and flood risk assessment should be undertaken in accordance with PPS25;
- Why no question regarding location of housing development?

## Key Actions 40

- In conjunction with other forms of development determine broad areas where housing can be accommodated maximising accessible and sustainable locations;
- Identify broad areas where maximum use can be made of pdl;
- Ensure infrastructure constraints/opportunities are recognised in determining broad areas for development (as part of Infrastructure Development Plan);
- Consider opportunities for improving health through links between housing and routes to other facilities/services and provision of open space.

## Provision of a range of dwellings of varying types, sizes and prices

**5.44** This sub-objective sought views on approaches to ensure that housing developments reflect the housing need in an area, including the possible introduction of variable thresholds for affordable housing and a possible rural exceptions policy to help meet affordable housing needs.

**5.45** There was general support, although sometimes qualified, for this policy option and the suggested approaches in the consultation document.

The need for affordable housing and family housing were raised but there were also concerns that the Core Strategy Policy should not be too prescriptive in relation to the types of dwellings required, rather this should be left to housebuilders and the market to determine.

## Core Strategy Key Themes 43

### Specify that housing developments reflect housing needs in that area

- Need for affordable homes is paramount;
- Meaningful response cannot be provided without SHMA;
- Support more family housing for which there is a need with sufficient amounts of land given flats and town houses have flooded the market recently. Allocate sufficient land at lower density than previous version of PPS3 to allow this to happen;
- Most logical solution but remain flexible should needs change over the plan period;
- Housing need studies are not precise indicators of need and therefore reference should be to desire to meet housing need and not requirement to deliver housing need. Market demand and housebuilders should be relied on to ensure right products are built at right time and in right place. Would not want to see Council determining house types as this is for house builders according to market demand;
- Planning policy should provide a framework for development and not be overly prescriptive. Market should determine types of houses. Option 1 only supported as far as housing need informing distribution and level of land allocations. Policy not traditionally attempted to be so prescriptive and can have artificial effects on the market e.g. effects of PPS3 in relation to density and garden developments.
- Need for Affordable Housing ignored in past in some developments.

### Variable site size thresholds and proportions of affordable housing across the district

- Approach of varying thresholds supported but viability must be a consideration;
- Requirements should be set at an appropriate level taking viability into consideration including other S106 requirements.

### The adoption of a rural exceptions policy to help meet affordable housing needs

- Should be a priority given the possible need for green belt land to be utilised.

### Alternative Suggestions and Other Comments

- Options 1-3 should be adopted in terms of providing a range of dwellings of varying type, sizes and prices;
- Re-use of buildings in green belt should continue to be supported.

## Key Actions 41

- Determine an appropriate affordable housing policy based on the SHMA and taking into account viability;
- Determine how prescriptive to be in policy relating to house types and sizes and bearing in mind national planning guidance;
- Continue to explore need for a rural exceptions policy taking into account the SHMA.

### Provision of good quality residential developments

**5.46** The consultation document suggested adopting a range of density standards, high standards of design and sustainability and improvements to the existing dwelling stock.

# 74 Objectives and Policy Options

5

**5.47** Overall there was support for the proposed approaches but some representations preferred less stipulation on density whilst others wanted higher densities for pdl to be retained to reduce the land take. Respecting the existing character of the district was also seen as important in relation to density. Some representations, whilst supporting the policy approaches on design and sustainability together with those relating to re-use of the dwelling stock and selective clearance, consider that some aspects need further explanation.

## Core Strategy Key Themes 44

### Adopt a range of density options across the district

- Revisions to PPS3 on density need consideration;
- Any density options should be applied across the district and be indicative only having regard to character of area;
- Not clear why a range of density options should be required across the district - pressure to maintain higher density development on pdl needs embedding in policy;
- Appropriate to adopt a range of densities dependent on character of area if diverse character of district is not to be compromised.

### Residential developments to be built to high standards of design and sustainability

- Approach needs further explanation with detail set out in next version of Core Strategy;
- A policy referring to design and sustainability standards needs to be in alignment with national standards;
- Should achieve over-arching aim of sustainable development and a high quality built environment;
- Energy efficiency essential including a strategy to improve insulation of pre-1920s housing stock;

- Inconceivable this option would not be followed if vision for safeguarding distinctive;
- character of district and promotion of sustainable development are to be realised.

### Improvement and re-use of the existing dwelling stock through housing renewal areas and selective clearance

- Support subject to detail being set out in next version of Core Strategy;
- Would further the objectives of sustainable development and maintaining character of district. Selective clearance which runs counter to these objectives should only be pursued as a last resort.

### Alternative Suggestions and Other Comments

- Options 1-3 should be used for the provision of good quality residential developments
- Any new housing should accord with Policy Option 18. Various organisation exist within the Hebden Royd Parish Council area to provide advice on eg renewable energy.
- Cooperative developments and self build schemes should be encouraged and supported.

## Key Actions 42

- Develop a range of density options for different parts of the district having regard to their character and latest Government advice;
- Develop policies on design and sustainability for new housing having regard to national standards and other advice;
- Develop policy and explore measures to improve the older housing stock including its energy efficiency;



- Ensure maximum use is made of the existing housing stock;
- Determine the role of other forms of housing delivery such as self build.

## Gypsies and Travellers

**5.48** A number of approaches were suggested in order to meet the needs of gypsies and travellers. Overall very few comments were received in relation to this sub-objective. Considering the needs of gypsies and travellers when disposing of Council owned land and identifying other public sector land were supported as approaches that would assist in meeting the needs of gypsies and travellers.

**5.49** The suggested policy options were viewed as not forming a comprehensive approach for the Core Strategy whilst each one could prevent acceptable sites coming forward by setting unnecessary limitations. Identifying broad locations within which detailed site boundaries could be established in the Land Allocations and Designations DPD was seen as being likely to rule out otherwise acceptable sites, although the reasons for this view are not clear.

### Core Strategy Key Themes 45

#### Consider the need to provide for gypsies and travellers when disposing of Council owned land

- Could be considered for new sites if it meets other criteria set out in the policy

#### Identify other public sector land that may be appropriate

- Could be considered for new sites if it meets other criteria set out in the policy

#### Consider the use of Compulsory Purchase Orders to acquire an

### appropriate site

- No specific comments made

### Identify broad locations within which detailed site boundaries should be established in the Land Allocations and Designations DPD.

- Likely to rule out otherwise acceptable sites

### Other Comments

- When considering site locations flood risk must be taken into account (PPS3 identifies caravans for permanent residential use as highly vulnerable and not to be located in flood zone 3) along with water infrastructure capacity, particularly sewerage networks;
- Reference should be made to the Gypsy and Traveller Accommodation Assessment (GTAA) for the area as this will form part of the evidence base in addition to the evidence in the RSS;
- Suggested approaches do not form a comprehensive approach. Instead clear and concise criteria against which allocations and applications can be assessed should be set down.;
- Each of the options could prevent acceptable sites coming forward by setting unnecessary limitations.

### Key Actions 43

- Ensure all the evidence is in place including the Gypsy and Traveller Accommodation Assessment;
- Explore all options in developing policy and ensure policy is deliverable.

## SO5 - Green Infrastructure and the Natural Environment

**5.50** The Consultation document suggested the following green infrastructure and the natural environment objective: "**To protect and enhance green infrastructure in Calderdale for its contribution to landscape, biodiversity, sport and recreation and its value for well being and health**". Many of the comments were supportive of the general principles expressed by the objective with some consultees stating that green infrastructure should not be sacrificed to meet development targets. Overall, the commitment made towards identifying, enhancing and preserving Green Infrastructure within Calderdale was welcomed.

### Policy Option 20 - Define a hierarchy of green infrastructure.

**5.51** Responses to this policy option included concentrating on the integration of green spaces, sport and recreational facilities to increase levels of physical 'green gym' activities available to families. It was claimed that this would make a greater contribution towards the health and well-being of the population. Respondents also said that they would like to see more recognition of rivers as natural assets and a greater emphasis on how these contribute to the green infrastructure network.

**5.52** With regard to potential indicators and targets, it was suggested that there is a need to have a green infrastructure system in place to measure these rather than a hierarchy which would imply that one element of green infrastructure is more important than another. However, all targets set will need to be achievable.

**5.53** Friends of the Earth suggested that support for this policy option needs to be combined with additional protection being provided to existing infrastructure such as wildlife corridors which are being compromised by planning applications.

## Core Strategy Key Themes 46

### Policy Option 20 - Define a hierarchy of green infrastructure

### Green Infrastructure:

- Integration of green spaces, sport and recreational facilities;
- Greater emphasis on the contribution of rivers to the green infrastructure network;
- Support for policy option should be combined with additional protection for existing infrastructure such as wildlife corridors.

### Indicators and Targets:

- Systems need to be in place to measure targets and indicators;
- Targets need to be achievable.

### Alternative Policy Approach:

***'Provide an accurate and accessible green infrastructure evidence database from which specific measures can be developed to address deficiencies in green space and green infrastructure and effective monitoring can take place. The diversity of the many functions of green infrastructure in Calderdale should be recognised.'***

### Key Actions 44

- Consider alternative policy approach;
- Revise/add to targets to make them more achievable and meaningful.

### Policy Option 21 - Put mechanisms in place to secure green infrastructure provision.

**5.54** Although support was expressed for the overall commitment made to securing green infrastructure provision, it was pointed out that the majority of suggested targets relate to woodlands. Whilst reference is

made to watercourses, green infrastructure is more diverse and it was suggested that Natural England's Accessible Natural Green Space Standard be used in addition or instead. It was also pointed out that Calderdale already has better woodland access than the targets set at regional level and as such the Core Strategy should seek more ambitious local targets.

**5.55** The Environment Agency suggested that the target relating to watercourses should be amended to '100% of water bodies meet good ecological status'. It was also pointed out that the directive requires a deadline of 2015 and that this should be added to any target with a caveat stating 'unless an alternative objective has been set'.

**5.56** In terms of Policy Options, Calderdale MBC, Safer, Cleaner, Greener Service has stated that Policy Approach 1 should be developed whereby the Core Strategy focuses on the improvement and enhancement of existing green infrastructure assets and/or looks to expand existing, or create new, green infrastructure assets. This approach should be informed by the green infrastructure hierarchy and evidence base outlined in Policy Option 20. Other respondents have suggested that a mix of all Policy Approaches should be employed.

**5.57** Whilst support was expressed for the use of the development management system to secure environmental protection and enhancement, it was noted that development viability could be affected if the amount of financial contributions made by developers is set too high. In such instances, the Council would need to decide what its priorities were in terms of affordable housing, green infrastructure, highway infrastructure or renewable energy.

## Core Strategy Key Themes 47

### Policy Option 21 - Put Mechanisms in Place to Secure Green Infrastructure Provision

#### Green Infrastructure Provision:

- General support for green infrastructure provision;
- Focus on the improvement and enhancement of existing green infrastructure assets, and/or look to expand existing, or create new, green infrastructure assets;
- Mix of all Policy Approaches;
- Use of Development Management system to secure green infrastructure provision;
- Ensure GI supports biodiversity;
- Support for policy option should be combined with additional protection for existing infrastructure such as wildlife corridors.

#### Targets and Indicators:

- Targets should include all green infrastructure;
- Natural England's Accessible Natural Green Space Standard should be used;
- More ambitious local targets should be set;
- Revisions and additions to targets are required to make them more achievable and meaningful.

#### Key Actions 45

- Consider alterations to policy option;
- Revise/add to targets to make them more achievable and meaningful.

### Policy Option 22 - Identify under-utilised assets and encourage better use.

**5.58** The majority of respondents suggest a mix of all Policy Approaches should be employed for Policy Option 22. As part of this approach, it was

# 78 Objectives and Policy Options

5

Calderdale MBC - September 11 Refined Issues and Options Feedback

suggested green infrastructure could be used to provide educational and recreational opportunities. There was also some support for the release of sites that do not contribute to meeting needs and have no special value for wildlife, heritage or other environmental considerations subject to raising the quality of other sites in the area. It was claimed that if the Council's housing requirement is to be delivered, this flexible approach will be fundamental. However, careful consideration using stringent criteria would need to be given to the release of any sites.

**5.59** One respondent questioned the relevance of a number of the Policy Approaches. It was claimed that Policy Approach 1 which seeks to increase interest in green infrastructure through education and awareness raising is not something that policy can impact upon. It was also claimed that Policy Approach 4 which seeks to protect and maintain public and (where appropriate) private green infrastructure prejudices private ownership rights.

**5.60** Responses to this policy option also reiterated the points made in paragraph 5.73 for Policy Option 21 where the Environment Agency suggested that the target relating to watercourses should be amended to '100% of water bodies meet good ecological status'. It was also pointed out that the directive requires a deadline of 2015 and this should be added to any target with a caveat stating 'unless an alternative objective has been set'.

## Core Strategy Key Themes 48

### Policy Option 22 - Identify under-utilised assets and encourage better use

#### Green Infrastructure:

- Mix of all Policy Approaches;
- Relevance of Policy Approaches questioned;

- GI to provide educational and recreational opportunities;
- Sites that satisfy Policy Option 5 could be released using stringent criteria.

#### Targets and Indicators:

- Revisions and additions to targets are required to make them more achievable and meaningful.

#### Alternative Policy Approach:

Replace Policy Approach 6 ***'Consider a return to the tradition of urban parks.'*** with ***'Improve the quality of urban parks so that they contribute fully to the functionality of GI in the area.'***

And:

***'Protect and maintain public and (where appropriate) private green infrastructure that makes a positive contribution to local needs - biodiversity, social, heritage, or environmental. Consider the release of sites that do not contribute to these needs subject to raising the quality of other sites in the area.'***

## Key Actions 46

- Consider alternative policy approach;
- Revise/add to targets to make them more achievable and meaningful.

### Policy Option 23 - Ensure that the green infrastructure network is joined up

**5.61** The majority of respondents suggested that a mix of all Policy Approaches should be employed for Policy Option 23. As part of this

approach, the Woodland Trust argue it is particularly important to create new habitat to reconnect biodiversity habitats which have become fragmented. This should make the countryside more permeable to wildlife helping it adapt to climate change. Others also reinforced the importance of wildlife corridors and ensuring that the green infrastructure network is joined up. In particular, it was requested that this importance be recognised before final decisions are made on land allocations.

**5.62** The Environment Agency has stated it would be helpful if this Policy Option included reference to restoring connectivity and facilitating fish passage within rivers. They state that the Water Framework Directive seeks the removal of all artificial barriers to fish migration, so all rivers within the region hold naturally self sustaining spawning populations of migratory fish by 2021.

**5.63** Friends of the Earth suggested that support for this policy option needs to be combined with additional protection being provided to existing infrastructure such as wildlife corridors which are being compromised by planning applications. The argument was put forward that there is no value in seeking to join up a green infrastructure network if the integrity and quality of the existing network is being degraded at the same time.

## Core Strategy Key Themes 49

### Policy Option 23 - Ensure that the green infrastructure network is joined up

- Joined up Green Infrastructure Network;
- Create new habitat to reconnect biodiversity habitats which have become fragmented;
- Importance of joined up GI network should be recognised in LDF before final decisions are made on land allocations;
- Restore connectivity and facilitate fish passage within rivers;
- Support for policy option should be combined with additional protection for existing infrastructure such as wildlife corridors.

### Targets and Indicators:

- Revisions and additions to targets are required to make them more achievable and meaningful.

### Key Actions 47

- Consider additions to policy approaches;
- Revise/add to targets to make them more achievable and meaningful.

### Policy Option 24 - Ensure that policies have regard to the economic, social and environmental benefits of green infrastructure

**5.64** The majority of respondents suggested a mix of all Policy Approaches for Policy Option 24. As part of this approach, the Woodland Trust state well planned green infrastructure forms an integrated network which maximises the environmental, social and economic benefits which it can provide. Natural England suggest a mix of all the policy options will provide economic, social and environmental benefits but that it is particularly important that communities appreciate the benefits of green infrastructure in terms of healthy activities, environmental enhancements and safe active transport.

## Core Strategy Key Themes 50

### Policy Option 24 - Ensure that policies have regard to the economic, social and environmental benefits of green infrastructure

#### Benefits of Green Infrastructure:



# 80 Objectives and Policy Options

5

Calderdale MBC - September 11 Refined Issues and Options Feedback

- Mix of all Policy Approaches;
- Well planned GI provides environmental, social and economic benefits;
- Important to note GI benefits such as healthy activities, environmental enhancements and safe active transport.

## Alternative Policy Approach:

**'Sustainability to be at the core of design; with developments having a positive impact on green infrastructure taking into account implementation and long term management.'**

## Key Actions 48

- Consider alternative policy approach.

## Policy Option 25 - Identify the functional role of green infrastructure

**5.65** The majority of respondents suggest a mix of all Policy Approaches should be employed for Policy Option 25. As part of this approach, Natural England state that climate change and in particular flooding are key considerations in the Calderdale area and green infrastructure is one means of helping to address these issues. They go on to state that ecosystem services and the role that green infrastructure plays in the provision of these services needs to be incorporated into this policy option.

**5.66** The Environment Agency raised issue with the need to mention the role of flood storage areas and the need to protect them. Comments were also received stating that flood mitigation and sustainable urban drainage schemes can create a variety of habitat such as wet grassland, ponds, fens and bogs as well as woodland. With this in mind, respondents wanted targets to include more habitats than just woodland.

**5.67** The importance of managing existing woodlands was raised as an important issue. It was claimed that merely planting trees without this future management will lead to severely degraded and derelict woods. Calderdale Council is developing its own tree and woodland strategy and this should be referred to in future documents.

## Core Strategy Key Themes 51

### Policy Option 25 - Identify the functional role of green infrastructure

#### Functional Role of Green Infrastructure:

- GI plays important role in the provision of ecosystem services;
- Mix of all Policy Approaches;
- Climate change and flooding are key issues;
- Full range of functions should be referred to;
- Policy Alternative 1 should include the importance of managing existing woodlands;
- Policy Option 25 could be combined with Policy Option 20.

#### Targets and Indicators:

- Revisions and additions to targets are required to make them more achievable and meaningful.

## Key Actions 49

- Consider combining Policy Options 20 and 25;
- Revise and add to targets to make them more achievable and meaningful.

## SO6 - Historic Environment and Design

**5.68** The consultation document suggests the following objective for the Historic Environment and Design: **"To protect and enhance the District's historic environment, and to ensure that new development helps to improve the local character and identity of Calderdale's built environment, and its communities, through high quality, inclusive design"**. There were no specific comments received about the wording or approach of the objective, however the following general comments were received.

- A clear commitment in strategy and policy should be made to implement, and more importantly maintain, Conservation Area Appraisals for the 13 areas that don't currently have them - the authority is required by law (Section 71(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990) to prepare and publish them;
- The term 'historic environment' includes undesignated heritage assets, not just designated ones; and
- The 'historic environment' includes below-ground archaeological remains which will be found within the historic cores of all Calderdale's historic settlements and should be archaeologically recorded in advance of destruction by development.

### Policy Option 26 - Protect and enhance the historic environment

**5.69** This policy option received support for all but one of the six potential options put forward. The policy option refers in the main to designated heritage assets, however undesignated heritage assets (such as archaeological remains that may be found during development) were mentioned as being important as well.

## Core Strategy Key Themes 52

### Policy Option 26 - Protect and enhance the historic environment

#### Option 1 - Reduce the number of heritage assets identified both nationally and locally as 'at risk'

- Support identified for this option.

#### Option 2 - Retain, update and reference a copy of the Record of Designated Assets for use by members of the public and the local authority in the preparation and assessment of planning applications

- Support noted; and
- The Core Strategy should not need to address this issue as the register of designated heritage assets will provide up-to-date records.

#### Option 3 - Have special regard to a heritage buildings's or area's special interest

- No support for this option. Comments refer to this being unnecessary within the Core Strategy due to requirements of PPS5.

#### Option 4 - Focus on the improvement and appraisal of existing conservation areas, over designating new ones

- Support noted, however a balance is required between protecting existing areas and designating new ones;
- Still a statutory duty to review boundaries of existing areas and ascertain whether new areas ought to be designated; and
- Important Conservation Area Appraisals are kept up to date.

#### Option 5 - Require applicants to demonstrate the benefits of a proposed development in relation to a relevant Conservation Area Appraisal

- Support noted for this option.

# 82 Objectives and Policy Options

5

Calderdale MBC - September 11 Refined Issues and Options Feedback

## Option 6 - Have particular regard to local significance and acknowledge local distinctiveness such as the textile/industrial heritage of the district, non-conformist chapels and historic barns

- Support noted for this option; and
- Graveyards should be included.

### Alternative options/approaches suggested:

- Include a reduction of the number of conservation areas on the 'at risk' register as a target in Table 6.1;
- Ensure adequate archaeological investigation/evaluation is carried out in advance of new developments;
- Policy needs to allow energy improvements in historic buildings and conservation areas to happen more easily;
- Should reference important natural features such as ancient and veteran trees which should be given strong protection from damage or destruction in line with PPS9 references; and
- Identify and set out a framework for the management of locally-important heritage assets.

### Key Actions 50

- Consider how to integrate comments above into draft policy framework for the historic environment; and
- Liaise with the Conservation Team in drafting the policy framework.

## Policy Option 27 - Promote high quality design in new development and existing public realm - design style

**5.70** Only a few comments were received on this policy option, with the key choice of whether policy should support 'contemporary, innovative

design in appropriate areas', or to support 'more sensitivity towards traditional design'.

**5.71** The comments received all supported the use of contemporary, innovative design in appropriate areas in the district. However most comments referred to the need to use both approaches dependent upon where within the district development is proposed, and the character of the surrounding area.

**5.72** Other comments stated the key consideration should be accounting for the local context, and appropriateness. One objection was received to 'copycat' development, with sustainability, energy efficiency and innovation stated as the most important considerations of 'quality design' in new developments.

### Key Actions 51

- Liaise with the Conservation Team in drafting policy framework.

## Policy Option 28 - Promote high quality design in new development and existing public realm - design requirements

**5.73** All four policy options proposed around design requirements received both support and objection, although few individual comments were received. Objection was based around the unnecessary burden placed on developers of the potential policy requirements.

**5.74** The most popular option was to raise awareness of specific design issues through a more detailed design SPD (Option 4). The arguments against this approach were that this would inhibit contemporary and innovative design, and that as a council we should be encouraging diversity in new development, not uniformity.

**5.75** The establishment of 'design review' for a certain size of development/location also had more than one expression of support. The

use of scale as a requirement to instigate a review was objected to on the basis that it is an inappropriate requirement to use.

## Key Actions 52

- Investigate potential for a design review service and implementation options;
- Investigate potential for a detailed design SPD;
- Liaise with the Conservation Team in drafting policy framework.

## Policy Option 29 - Improve the accessibility and safety of new developments

**5.76** Few comments were received in relation to this policy option. Objections were received to options one (new housing to meet lifetime homes standards where practical), three and four (seek to exceed minimum accessibility requirements and car parking standards). One note of support was received for option three (accessibility requirements) and five (secured by design principles).

**5.77** Specific reference was made to the urgent need to incorporate reference to the area's mining legacy. This should ensure that land is thoroughly investigated for potential mining legacy problems to ensure that future development is safe and stable.

## Key Actions 53

- Draft policy framework.

## S07 - Transport

**5.78** The consultation identified transport as a significant issue for the Core Strategy and suggested an objective which read '**To ensure the provision of a sustainable, safe and efficient transport system which reduces the need to travel**'. Comments on the objective were limited but the need to 'flag-up' the relationship between transport, planning and housing was noted.

## Policy Option 30 - Ensuring places are properly connected

**5.79** This policy option created reasonable amount of comment, however, most were generally in favour. General comments included the need to recognise the important role of waterways and towpaths and the opportunity to provide stations at Hipperholme and Elland should be grasped. There was also a comment that the car is important and we need to deal with our existing traffic 'hot spots'.

## Core Strategy Key Themes 53

### Policy Option 30 - Ensuring places are properly connected

#### Ensure new development takes advantage of opportunities to achieve new and improved infrastructure

- Gained wide support;
- New/ improved infrastructure should not include significant new road infrastructure as this usually creates 'knock-on' pressures elsewhere on the road network;

#### Ensure new development takes advantage of opportunities for increased usage of existing modes of sustainable transport

- Gained wide support;
- Would reduce the need for additional infrastructure; and
- Need to protect and improve existing services (rail).

# 84 Objectives and Policy Options

5

Calderdale MBC - September 11 Refined Issues and Options Feedback

**Locate development in fewer locations to provide a critical mass to help attract new funding, infrastructure and to support existing infrastructure.**

- Created the most objection; and
- Others thought could aid infrastructure through developer contributions.

An alternative view was that the policy should not be overly restrictive on commercial/ industrial development.

## Key Actions 54

- Assess highway infrastructure requirements of the 'preferred option' for the Core Strategy;
- Promote development near existing service centres/ transport hubs; and
- Support and improve the existing rail network.

## Policy Option 31 - Increasing modal shift away from the private car

**5.80** All of the policy options for increasing shift away from the car were generally supported. However, it was suggested the car should not be discounted as we need to encourage inward investment and deal with bottlenecks such as Hipperholme and Salterhebble. Other general comments included a need for cheaper public transport, businesses to contribute towards a subsidy of public transport costs and consider transport hubs.

## Core Strategy Key Themes 54

### Policy Option 31 - Increasing modal shift away from the private

## car

Many supported a mix of the measures suggested to support modal shift, specific comments to individual approaches are included below;

### All new developments must provide high quality cycling and walking facilities

- Considered unrealistic for all development to provide such facilities;
- Need to protect/ enhance redundant transport infrastructure for walking/ cycling

### Encourage improved park and ride facilities

- Not considered viable;
- Increase parking at rail stations;
- Mytholmroyd could act as a park and ride to alleviate traffic in Hebden Bridge; and
- If park and ride is proposed its effects on the strategic road network need to be assessed

## Key Actions 55

- The draft policy needs to consider a range of opportunities to promote a modal shift;
- Consider where new development could provide explicit community benefits for transport; and
- Consideration if Park and Ride facilities are feasible;

## Policy Option 32 - Reducing the need to travel

**5.81** The policy options aimed at reducing the need to travel created



mixed comments with some considering them to be admirable but unrealistic as people will travel for better opportunities.

## Core Strategy Key Themes 55

### Policy Option 32 - Reducing the need to travel

All the options got some support however specific comments are provided below;

#### All new development to provide a mix of uses to help reduce the need to travel

- Admirable but unrealistic for ALL major development;
- Needs to be able to sustain a wide range of uses such as shops, post office etc; and
- Approach may stifle the development of existing employment sites

#### New development should be located in areas with deficiencies in order to increase the number of facilities reducing the need to travel

- Admirable but lack of information as to how this would work, may also contradict other spatial policies in the LDF;
- Support as it will help to connect residents, visitors and communities to sustainable means of access;

#### New developments should incorporate some live/work units to reflect the greater numbers expected to work from home

- LDF should promote working from home.

## Key Actions 56

- Any policy should not prescribe that all major development has to provide a mix of uses;
- Consider where new development could provide explicit community benefits for transport; and
- Provide a policy framework which encourages home-working

## SO8 - Communities and Narrowing the Gap

**5.82** This was a new objective introduced in the Refined Issues and Options consultation to pick up on the Council and its partners priorities and reflect parts of national Planning Policy Statement 1: Delivering Sustainable Development (PPS1) which aim to reduce inequalities. The suggested objective was '**Work to ensure that the differences in health, quality of life and economic prosperity between different communities in Calderdale reduce**'.

**5.83** Discussion on this issue was limited but some useful comments were made. These comments mostly concerned issues with transport, health, waterways and areas of deprivation.

## Core Strategy Key Themes 56

### Policy Option 33 - Work to ensure that the differences in health, quality of life and economic prosperity between different communities in Calderdale reduce

General comments on the policy options were;

- No mention of transport options;
- Need to prioritise funding for green spaces in deprived areas;

# 86 Objectives and Policy Options

5

Calderdale MBC - September 11 Refined Issues and Options Feedback

- Improve opportunities for walking and cycling - they don't have to be the whole journey (bike sheds and bus stop sites);
- Include communal growing spaces; and
- Provide a spatial definition of where the priorities should be focused.

From the policy options suggested *'Encourage the healthy regeneration of the district by providing opportunities for physical activity, for instance encouraging the development of safe, attractive walking and cycling routes, and 'Seek developer contributions and other funding sources to enhance communities deficient in infrastructure'* were the most supported.

## Key Actions 57

- Identify the main areas of deprivation in Calderdale and what are the key improvements required; and
- Make transport and green spaces more explicit within a draft policy;

## 6 Minerals and Waste Policy Options

### Introduction

**6.1** The Minerals and Waste Objectives and Policy Options document provided supporting information for the minerals and waste strategic objectives contained in the Core Strategy Refined Issues and Options document. Each objective was supported by potential policy options for the Core Strategy with the aim of meeting the objectives. Potential targets and indicators were also included for comment as they represented a possible monitoring framework.



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Minerals and Waste Objectives  
and Policy Options

January 2011



**6.2** There were 165 separate comments made directly to this document from a wide range of individuals, groups and agents. The comments were wide-ranging with many conflicting views. The remainder of this chapter looks at the main themes and considerations for the Core Strategy from the comments received to the Minerals and Waste Objectives and Policy Options document.

### SO9 - Minerals

#### General Comments

**6.3** A number of consultees felt the document was too technical and difficult to understand. There were a number of responses which focused on coal, and the legacy of mining activity in the district. Other themes included constraints to be considered when defining Mineral Safeguarding Areas (MSAs), and the restoration of quarries. Some consultees were concerned as to future policies on disused quarries. The Coal Authority commented on the surface coal reserves within the district, and emphasised the role clean coal is expected to play within the overall energy mix in the future, as well as the

need to ensure the electricity supply is reliable and secure.

### Minerals Objective - SO9

**6.4** The original objective read as follows : **"To ensure a sufficient and sustainable supply of minerals, having regard to the need to encourage the efficient use and recycling of minerals, minimising the environmental and social impacts of mineral workings, and promote restoration of mineral sites that provide a beneficial after use"**. One consultee offered an alternative, which read as follows: *"To ensure a sufficient and sustainable supply of minerals including through safeguarding, having regard to the need to encourage the efficient use and recycling of minerals, minimising the environmental and social impacts of mineral workings, and promote restoration of mineral sites that provide a beneficial after use."* This was felt to be more in line with MPS1 than the proposed objective. Others wanted clarity as to whether this would be taken forward as policy in the Core Strategy; if so it would be supported in part, but it needed to refer to mineral safeguarding.

### Compliance with National Mineral Planning Guidance.

**6.5** It was suggested that in order to meet the requirements of MPS1 and MPG3 the Core Strategy needs to include a Mineral Safeguarding Area (MSA) covering the extent of the geological surface coal resources. Support was evident for the prior extraction of minerals where sterilisation would otherwise occur from built development, alongside including policies for assessing energy mineral proposals (e.g. Surface coal). The Core Strategy should also include strategic mineral site allocations, appropriate policies for restoration and aftercare, and refer to the potential for coal resources to provide energy through new technologies relating to methane extraction, and include suitable flexible policies when considering such proposals. The Minerals Policy approaches need to be co-ordinated with the general development strategy.

### New Development and Mineral Sterilisation

**6.6** Mention was made of MPS1(para 13) and MPG 3 (para 22), which

refer to avoiding the unnecessary sterilisation of mineral (incl. Coal) resources through non-minerals development. Furthermore, it was stated they encourage the extraction, where practicable, of minerals (incl. Coal) in advance of developments that would otherwise sterilise the resource. To be consistent with national mineral policy, the Core Strategy should acknowledge that as part of taking forward any development/redevelopment proposals within the surface coal resource area, it will be necessary for any sterilisation effects on the coal resource to be considered, as well as whether prior extraction would be appropriate. The Coal Authority would be seeking prior extraction of resources should this possibility arise.

## Mining Legacy and Ground Instability

**6.7** It was felt the Core Strategy should refer to the range of potential public safety issues relating to the legacy of coal mining. Some consultees indicated that although mining legacy issues are generally benign in nature, potential public safety and stability problems can be triggered and uncovered by development. Examples included the collapse of shallow mine workings and mine entries, gas emissions from coal mines, spontaneous combustion, transmission of gases into adjacent properties, coal mining subsidence, and water emissions from abandoned coal mines. Such hazards may currently exist, be caused by development, or occur at some point in the future. PPG14 is considered to contain the science and best practise as to how to safely treat unstable ground. Appropriate policies should require new development proposals to take account of any risks associated with coal mining legacy and include suitable mitigation measures to address them. It was stressed that land instability and mining legacy issues need not prevent development, and at the same time, development could offer the opportunity to appropriately treat any existing hazards to the benefit of local communities and in the interests of sustainability and public safety.

## Re-opening abandoned / dormant quarries

**6.8** Some consultees expressed concern over any policy which would allow the re-opening of abandoned or disused quarries, especially as many are now surrounded by conflicting uses (for example housing, schools

etc), and the road infrastructure that surrounds some (such as Pond Quarry, Lightcliffe Road, Brighouse) is not considered suitable for the HGV's, which could lead to road repairs that placed additional strain on the Council's resources. Other concerns were the protection of infrastructure, such as gas or water mains, health problems that could potentially arise from mining, including the environmental effect of venting methane. One comment suggested that such impacts would be more acute if they were to be re-opened for quarrying as distinct from solid waste disposal.

**6.9** There were concerns about the disused quarries not included in Table 1.2. Some urged the Council to use its powers to prevent owners of long dis-used quarries in highly developed residential areas from re-opening them, or at the very least require a formal consultation process with all residents and small businesses within a certain radius of the site. It was emphasised there needs to be a clear distinction between those quarries located in isolated areas, and those that are in highly built-up areas; therefore all quarries should be assessed individually, as to whether they should be left dormant, re-opened or filled taking into account the surrounding uses, traffic impacts, safety, environmental impacts, health impacts, and working practises.

## Geological & Resource Information

**6.10** The Coal Authority require the Council to use the GIS data of the surface coal resources to supplement the BGS data as the starting point for defining coal MSAs. It was suggested the entire surface coal resource be identified as an MSA, as well as existing worked sites which may still have workable reserves that could be extracted with modern techniques. MSAs were considered as a long term planning tool which should safeguard the entire surface coal resource since some areas may become economically viable during the plan period and beyond. It was pointed out that English Heritage and BGS are carrying out a survey of historic sources of building stone across the region together with an analysis of the key buildings and areas where that stone has been used. There may as a result of this, be other sources of building stone which the plan ought to safeguard in line with the advice in MPS1.

## Other Comments

**6.11** The National Grid highlighted the fact it is their policy to retain existing overhead lines in-situ, because of the strategic nature of the national network and because they do not own the land on which their pylons are located. There are also statutory electrical safety clearances to take into account. Should any sites be taken forward as a minerals site within these areas, the operators should be made aware of these issues in relation to the National Grid. There was also reference concerning venting and flaring of gas in relation to mineral extraction and the potential impact on aircraft in the vicinity. Any planning permission granted would need to establish whether such releases of gas would constitute a potential danger to aircraft, and in instances where this would be the case, the relevant bodies need to be made aware of this.

## Core Strategy Key Themes 57

### Minerals Objective

- Needs to refer to safeguarding;

### Mining Legacy

- Refer to potential public safety issues;
- Include policies to take account of mining legacy;
- Need not prevent development and can often assist in resolving existing hazards;

### Abandoned / Dormant Quarries

- Some surrounded by housing, schools etc;
- Unsuitable road infrastructure;
- Council should prevent re-opening of these or at least formally consult local residents & business;
- Assess each individual quarry as to suitability;

## Geological & Resource Information

- Use the Coal Authority Surface Coal Resources GIS information;
- English Heritage / BGS historic building stone study should provide additional data.

## Key Actions 58

- Refer to Mineral Safeguarding in the Objective;
- Consider how to deal with Mining Legacy Issues;
- Consider policy to deal with abandoned / dormant quarries

## Safeguarding Different Minerals

**6.12** There was an agreement from some consultees that the Core Strategy needed to safeguard Building Stone, Brick Clay, and Surface Coal.

## Designating Mineral Safeguarding Areas / Amendments to the Existing Safeguarded Area

**6.13** MPS1 (para13) requires Calderdale to define MSAs in Local Development Documents, in order that proven resources are not needlessly sterilised by non mineral development, and that where non-mineral development occurs within the MSA, prior extraction of the mineral resource is encouraged. Some consultees objected to any constraints including Urban Areas being applied when designating MSAs, since this would lead to the continued sterilisation of mineral resources which could otherwise be extracted prior to regeneration or redevelopment taking place. National policy does not set any site size thresholds for applying considerations, nor does it advocate the removal of any urban areas or other constraints. Some considered applying constraints when designating MSAs would



make the Core Strategy fundamentally unsound, adding that urban regeneration and new development proposals offer the potential for mineral resources to be extracted prior to regeneration, which can and has taken place in urban areas at very small scales (the smallest example given was 0.3ha), and in a matter of weeks. One comment asked if it would be beneficial to reduce the extent of the existing Minerals Area of Search.

**6.14** It was acknowledged there was a need for some form of sifting criteria to enable the MSA policy to be effectively carried out, one suggestion was rather than constraints, certain kinds of application (e.g. Householder development) would be exempt from the need to consider prior extraction. It was felt such a proportionate approach would assist in successfully implementing a MSA policy. The Coal Authority commented they are seeking a policy to require prior extraction in relation to all development proposals in the area of surface coal resources without the use of sifting criteria, but recognised the difficulties in making this requirement feasible in the Development Management process. Prior extraction was suggested to be one of the most economically viable methods of removing potential land instability problems caused by past mining activity at shallow depth. It was stated that designating a MSA was only half the process to safeguard the mineral resources, the other part is ensuring an effective and justified evidence led policy which provides the implementation mechanism and gives a practical application of the MSA, ensuring the least amount of minerals are sterilised.

## **MSAs, Working Mineral Sites, Buffer Zones.**

**6.15** Some consultees felt working mineral sites should be included in MSAs, and that buffer zones should be applied to MSAs; others objected to the application of buffer zones, as MPS2 (paras 24-29) gives protection for the proximity of mineral workings to communities, and these measures are considered to give appropriate safeguarding and enables the correct level of controlling and mitigation without sterilising reserves.

## **MSAs and Other Planning Designations**

**6.16** More than one consultee felt urban areas should be included within

MSAs, others felt that none of the proposed constraints should prohibit the designation of MSAs, especially urban areas where shallow coal reserves exist. Other consultees both endorsed the proposed list of constraints, and suggested adding Historic Parks and Gardens, water abstractions, springs, rivers, other surface water features, Local Wildlife Sites and Biodiversity Action Plans priority habitats. The use of PPS25 was recommended in order to identify any mineral sites which may be affected by flood risk. The inclusion of SSSIs was welcomed as a constraint. The proposal not to include Special Areas of Conservation (SAC) and Special Protection Areas (SPA) was also supported due to their existing high level of protection, which would likely prevent mineral working taking place anyway. The need for consistency with neighbouring authorities was highlighted, especially as some constraints (e.g. SSSIs) would cross authority boundaries.

## **Core Strategy Key Themes 58**

### **Mineral Safeguarding Areas - General Comments**

- The Core Strategy should Safeguard Building Stone, Brick Clay & Surface Coal resources;
- Working mineral sites should be included in the MSA;
- Mixed views on applying Buffer Zones to MSAs.

### **Constraints**

- Urban Areas should be included in MSAs;
- Make certain types of application exempt from considering prior extraction;
- Suggested additional constraints:
  - Historic Parks and Gardens;
  - Water abstractions, springs, rivers, other surface water features;
  - Local Wildlife Sites;

- Biodiversity Action Plan Priority Habitats;
- Need to be consistent with neighbouring authorities.

## Core Strategy Key Themes 59

### Mineral Safeguarding Areas - Original Policy Options

#### MW1 - Mineral Safeguarding Area (1)

1. Mineral Safeguarding Areas (MSA) should ensure areas of proven resources are not sterilised through other development. The extent of MSAs should be identified on the key diagram.
2. Prior extraction should be encouraged where possible where non mineral development is permitted within MSAs;
3. MSAs should incorporate working mineral sites;
4. MSAs should incorporate facilities which are used for processing secondary and recycled aggregates;
5. Buffer zones should be drawn around the mineral resource to further protect both mineral and non mineral development.

#### MW2 - Mineral Safeguarding Area (2)

1. Mineral Safeguarding Areas (MSA) should ensure areas of proven resources are not sterilised through non minerals development. The extent of MSAs to be identified on the key diagram.
2. Where non mineral development is permitted within MSAs, prior extraction should be encouraged where possible unless it is evident the resource is of no economic value;
3. Working mineral sites and facilities which are used for processing secondary and recycled aggregates are not required to fall within

the designated MSA since the MSA would not add any protection to the working site;

4. The MSA boundary should reflect the extent of the mineral resource.

### Policy Options Comments

Some consultees were pleased that both policy options concerning MSAs included references to prior extraction, although some expressed a preference for point 4 of policy option MW2, since it did not appear to consider urban areas as a constraint. The same consultee also supported policy option MW1 which included working mineral sites and facilities within MSAs. Some felt a mix of both MW1 and MW2 would be preferable, with points 1, 3, and 4 from MW1 and points 2 and 4 from MW2.

- Specific support for MW1 points 1, 3 and 4
- Specific support for MW2 points 2 and 4

### Key Actions 59

- Safeguard Building Stone, Brick Clay and Surface Coal;
- Reconsider list of constraints;
- Need to be consistent with Neighbouring Authorities;
- Consider how to include preferences expressed in a MSA policy.

### Site Allocation Approaches.

**6.17** Although the main focus of the Minerals element of the Core Strategy is concerned with designating Mineral Safeguarding Areas (MSAs), there were some options put forward that encouraged discussion of site allocations. MPS 1 offers 3 different levels of site designation; 'Specific Sites', 'Preferred Areas', or 'Areas of Search'. One consultee did not

express a preference, as long as any site allocation policy was sufficiently flexible to cater for changing circumstances during the period of the plan, particularly in relation to energy minerals. Others commented despite a greater degree of confidence which results from identifying specific sites, even allowing for landowners support, significant environmental constraints could still prevent development. There was some support for the 'Area of Search' approach, especially concerning coal, since coal mining companies have found viable seams outside even 'Preferred Areas of Search'. It was felt that only with detailed analysis at a given location can the true knowledge of depth and quality of the seams be understood.

## Core Strategy Key Themes 60

- Allocation policies need to be flexible to cater for economics of mining;
- Even identifying specific sites does not guarantee development;
- Some support for the 'Area of Search' Allocation.

## Site Allocation Policies

## Core Strategy Key Themes 61

### Site Allocations - Original Policy Options

#### MW3 - Site Allocation Policy Options (1)

1. Specific sites will be identified and any proposals for new or extended sites within these will be subjected to a criteria based policy, including conditions for a sites restoration and aftercare;
2. Preference will be given to the extension of existing operations as opposed to developing new sites;

3. Proposals involving the processing of secondary and recycled aggregates will be encouraged wherever possible in order to reduce reliance on primary extraction;
4. Within Calderdale, Minerals related transport should seek to make full use of sustainable forms of transport.

#### MW4- Site Allocation Policy Options (2)

1. Preferred areas will be identified and each proposal for new or extended sites within these will be subjected to a criteria based policy, including conditions for a sites restoration and aftercare;
2. Preference will be given to the extension of existing operations as opposed to developing new sites;
3. Proposals involving the processing of secondary and recycled aggregates will be encouraged wherever possible in order to reduce reliance on primary extraction;
4. Within Calderdale, Minerals related transport should seek to make full use of sustainable forms of transport.

#### MW5 - Site Allocation Policy Options (3)

1. Areas of Search will be identified and any proposals for new or extended sites within these will be subjected to a criteria based policy, including conditions for a sites restoration and aftercare;
2. Preference will be given to the extension of existing operations as opposed to developing new sites;
3. Proposals involving the processing of secondary and recycled aggregates will be encouraged wherever possible in order to reduce reliance on primary extraction;
4. Within Calderdale, Minerals related transport should seek to make full use of sustainable forms of transport.

### Comments on Policy Options

- Some consultees felt that policy option MW3 was the preferred option in that it was the closest to reflecting the requirements of

MPS1. Others that indicated a specific preference referred to policy option MW5, especially in relation to coal, since viable seams have been found outside areas of search in other parts of the country, meaning options MW3 and MW4 would allocate too smaller an area.

- Others did not express a preference, but welcomed that proposals for new or extended sites would be subject to a criteria based assessment, although this was on the condition for some that it included a transport impact as a key criterion. Whilst the use of sustainable modes of transport for minerals is preferred, there was limited scope for its application within Calderdale. Some respondents felt that different options may be appropriate for different minerals. An example was given re Coal, since the economics of extraction are determined by the international price of coal, which varies over time; therefore it is difficult to identify specific sites in a long term plan, especially on a resource that at certain times may be uneconomic but which at other times may become highly economic.

## Summary of Policy Options Comments:

- Support for MW3, as it reflected MPS1;
- Support for MW5 as evidence of viable resources outside of 'Preferred Areas' (MW4) and allows for changing economic circumstances;
- Support for a criteria based policy, provided transport is a key criterion;
- Limited scope for sustainable mineral transport in Calderdale;
- Different options may be suitable for different minerals.

## Key Actions 60

- Needs to be flexible enough to account for changing economic circumstances;
- Consider how to accommodate support for Specific Site and Areas of Search allocations;
- Needs to consider transport as a key criteria.

## Restoration of Mineral Sites

**6.18** There was a suggestion for alternative wording with regards the restoration section (para 1.60): *"Restoration should be carefully designed for maximising biodiversity gain with appropriate high value habitats created such as heather moorland, unimproved grassland, wetlands, and woodlands."* More than one consultee emphasised the biodiversity benefits that can be achieved through mineral restoration, and encouraged restoration in a manner that contributed to local Biodiversity Action Plan targets and Green Infrastructure Strategies. The need to ensure long-term management agreements were in place was highlighted, especially where habitat creation takes place as it would need to be maintained in a favourable condition. The recognition that restored mineral sites can serve a number of different functions including nature conservation and habitat creation, recreation and agriculture was welcomed, as well as the contribution sites can make to green infrastructure.

**6.19** Whilst it was acknowledged that any restoration schemes involving landfill would need to be strictly controlled, some consultees indicated that appropriately capped landfill sites can still have a beneficial after use. Restoration plans should be sustainable and take account of existing open space type and quality in the area, as well as adjacent land uses in order that the right restoration is happening in the right place. There was also reference to preserving geological features where these are present.

## Core Strategy Key Themes 62

### Restoration

- Should be carefully designed to maximise biodiversity gain;
- Make a contribution to Local Biodiversity Action Plan Targets and Green Infrastructure Strategies;
- Ensure long term management agreements are in place;
- Restored mineral sites can serve a number of different functions;
- Appropriately capped landfill sites can have a beneficial after use;
- Restoration plans should take account of the needs of the area;
- Geological features should be preserved.

### Restoration Policy Options

## Core Strategy Key Themes 63

### Restoration - Original Policy Options

#### MW6 - Restoration Policy Options (1)

1. Restoration of sites should reflect the priorities within the Local Biodiversity Action Plan and other local biodiversity strategies;
2. Restoration plans should aim to be in accordance with any relevant landscape scale priorities;
3. Any agreements should secure at least 5 years aftercare management of the site.

#### MW7 - Restoration Policy Options (2)

1. Restoration of sites should promote opportunities to enhance the overall environment and leisure opportunities.
2. Aftercare agreements should be agreed on a case by case basis dependent on the nature of the restoration scheme.

### Comments

- It was felt important that in the interest of communities and mineral operators maximum flexibility was built into any restoration policy, in some instances this meant option MW7 point 1 was supported, as some regarded that it encompassed points 1 and 2 of MW6, although if biodiversity and landscape scale priorities were particularly relevant, point 1 of Option MW7 could be extended as necessary. Support for MW6 was evident, but it was suggested the aftercare agreements should have a longer timescale, 20 years was recommended. Alternatives were proposed, one including elements of both policy options, points 1 and 2 of MW6, and point 2 of MW7, with an additional point which read *"Restoration of sites should seek to enhance Calderdale's Green Infrastructure, including opportunities for nature conservation, recreation and agriculture where appropriate"*.
- Other views suggested as the main aim of restoration was to leave a lasting positive legacy on the locality, whether this should focus on the delivery of biodiversity strategies or leisure opportunities was dependent on the needs of the locality. This means an open flexible, case by case policy approach was preferred, including the length of aftercare agreements. An amalgamation of policy options MW6 & 7 were in this instance seen as the preferred option.



## Summary of Policy Options Comments:

- Should be flexible;
- Support for MW7 point 1, with an option to extend this to take account of MW6 points 1 and 2;
- Support for MW6, but needed a longer aftercare agreement;
- Support for having a policy consisting of MW6 points 1 and 2, MW7 point 2, and an additional point concerning Green Infrastructure;
- Support for an amalgamation of MW6 & MW7.

## Key Actions 61

### Restoration Policy

- Needs to be flexible enough to respond to local needs;
- Consider how to accommodate specific reference to biodiversity, landscape priorities and Green Infrastructure;
- Consider how to include a suitable criteria concerning aftercare agreements.



## SO10 - Waste

### General Comments

**6.20** Many comments related to specific issues which are discussed in the following pages; however there were a few 'general comments' on the waste objectives and policy options consultation. Although it was felt the methods and data sources used to calculate the waste management requirements were reasonable and thorough, the level of detail was found to be a little counterproductive mainly because there is so much change in the waste industry and it is difficult to keep waste information current. Whilst the plan is for Calderdale, consultees needed an explanation about how facilities would interact with those in neighbouring authorities. Others felt the document did not make clear how much waste that originates in Calderdale is managed in Calderdale, and it was unclear how the strategy will improve on the whatever these current levels are. Consultees were pleased to note the need for greater recycling, recovery, and treatment capacity in relation to Municipal Solid Waste (MSW) and Commercial and Industrial Waste (C&I) waste has been recognised, in line with the forecast for a greater proportion of the Borough's waste to be treated in future years.

### Municipal Solid Waste (MSW) Arisings

**6.21** Some consultees agreed with the forecast Municipal Solid Waste (MSW) growth rate (remaining static or with a slight increase), which would most likely be linked to a rise in population; however there was a request that the methodology behind the MSW calculations be clarified.

### Commercial and Industrial (C&I) Waste Arisings

**6.22** The method used to predict Commercial and Industrial (C&I) waste arisings was considered reasonable by some, but there was a need to treat any forecasts with caution, due to economic and technological factors.

## Construction, Demolition, Excavation (CD&E) Waste Arisings

**6.23** It was suggested that as increases in housebuilding and economic activity could generate more waste, there is a need to consider the increased recycling rates and resulting impact on waste facilities to deal with this. Some consultees felt that a large proportion of Construction waste is dealt with on site. Others were of the opinion that CD&E waste not segregated either ends up in landfill, or in some cases is fly tipped; therefore facilities which help smaller construction firms divert waste from landfill could be beneficial. The impact of the recession should be taken into account when considering the level of facilities that may be required in the plan period.

## Hazardous Waste Arisings

**6.24** The Environment Agency commented their Hazardous Waste database has recently been updated to include 2009 data, and this will provide further information on the levels of Hazardous waste.

## Agricultural Waste Arisings

**6.25** It was considered this waste type is generally dealt with either on site or in the C&I waste stream; however it was recommended that policies take account of new types of agricultural waste facilities such as Anaerobic Digestion. In addition, even if no provisions are made now, it was suggested policy still recognises there may be a need for such a facility in the future.

## Core Strategy Key Themes 64

### Summary of Waste Arisings

#### General

- Calculations reasonable and thorough;
- Level of detail sometimes counterproductive;

- Need to explain cross border impacts;
- Need for greater capacity recognised;

## Municipal Solid Waste

- Agree growth rate forecast;
- Clarify methodology behind MSW calculations;

## Commercial and Industrial Waste

- Reasonable calculations but treat with caution;

## Construction Demolition and Excavation Waste

- Impact of recession needs taking into account;
- Consider needs of smaller construction firms;

## Hazardous Waste

- New data available for next consultation;

## Agricultural Waste

- Generally accounted for in the C&I data;
- Consider on farm technology such as Anaerobic Digestion;

## Key Actions 62

- Data and methodology need presenting in a clear format;
- Discuss cross border impacts
- Consider impact of recession;
- Use new available data;
- Consider impact of new technologies on policies.

## Existing Landfill Capacity

**6.26** The Environment Agency commented they now have 2009 data on landfill capacity. There was support for proposing to include Development Management policies limiting additional landfill sites, and strict controls on any proposed landfill operations. Given the number of quarries within the district, it was considered unlikely there would be a need to seek additional capacity outside of these. With appropriate capping of inert waste, it was felt sites can be restored to a beneficial after use, contributing to Green Infrastructure.

## Existing Transfer, Recycling, Recovery and Treatment Capacity

**6.27** There were a number of comments relating to the Household Waste Recycling and Transfer site at Eastwood near Todmorden. The objections to the site concentrated on its proximity to housing, and the argument that if the site were to be proposed now it would be refused as it contravenes all European and National criteria for waste transfer stations. Other concerns surrounded the potential impact on the water quality in the River Calder, the historic environment, and the traffic impact.

**6.28** In terms of general comments on transfer, recycling, recovery and treatment capacity, some consultees agreed that maximum permitted capacity did not often reflect the maximum operational capacity of facilities. In terms of the capacity scenarios presented, it was suggested that an average of inputs is more a reflection of the economic situation rather than the operational efficiency of the waste facility, compared to the other scenario (maximum operational capacity is 80% of maximum permitted capacity) which would give a better idea as to how much waste a facility is able to handle. The 80% capacity scenario was also supported by another consultee. It was pointed out that looking at the amount of waste handled can help identify sites that may no longer be operational.

## Existing Metal Recycling Sites

**6.29** The consultation document proposed to remove the Metal Recycling capacity from the available capacity for MSW and C&I waste. Comments

appeared to support this approach, in that metal recycling is a specialist activity and therefore best kept separate from C&I data, especially as waste metals often move through more than one permitted treatment facility during processing, resulting in a risk of double counting the waste.

## Existing Waste Water Treatment Capacity

**6.30** Comments indicated that the capacity or need for additional facilities of this type were largely dependent on the scale of additional housing delivered by the plan.

## Summary of Capacity Scenarios

**6.31** A comment was made that it would be useful to know which permitted sites the figures used in tables 2.20 (Capacity of Recycling / Recovery Facilities) and 2.21 (Capacity of Treatment Facilities) referred to. It was pointed out that some of the facility types in the tables usually specialise in a small number of waste streams, therefore the capacity indicated would not be suitable for all types of waste. Concern was expressed that it appeared arbitrary to conclude the capacity figures could support a long term policy and site provision, and the plan should have much more flexibility built into it.

### Core Strategy Key Themes 65

#### Capacities

##### Landfill

- New data on Landfill Capacity available;
- Quarries could provide additional landfill sites;
- Appropriately capped landfill can be of benefit to Green Infrastructure;

##### Transfer, Recycling, Recovery and Treatment

- Objections to the continued use of the Eastwood site;
- Permitted capacity not often a reflection of the operational capacity;
- New data now available for next consultations;
- Average Inputs more a reflection of economic activity than operational efficiency;
- The 80% of permitted capacity scenario would give a better idea of operational capacity;

## Metal Recycling Sites

- Keep capacity separate from C&I;

## Other comments

- Useful to identify which sites the figures referred to;
- Some of the capacity would not be suitable for different types of waste;
- Concern that arbitrary figures would be used to support long term policy;
- Policy needs to be more flexible.

## Key Actions 63

- Use new available data;
- Consider objections to Eastwood;
- Consider comments on capacity scenarios;
- Separate Metal Recycling capacity from other capacity;
- Refer to specific sites;
- Analyse the types of waste the spare capacity would be suitable for;
- Build some flexibility into policies.

## Summary of Future Recycling, Recovery, Treatment Capacity Needs

**6.32** Consultees felt the assumptions made about required capacities were reasonable based on the data used, although since publication of the consultation document updated data has been released by the Environment Agency.

**6.33** In order to achieve more landfill diversion and higher recycling and recovery rates, it was agreed that more capacity is required. However, an alternative view was any assumptions about the number of facilities required were prevented due to the theoretical nature of the data and out of date figures used, along with the fast changing technology and attitudes to waste and recycling. With this in mind, it was felt that a more flexible approach should be adopted which could provide facilities as and when they are required, by including a policy that supports the provision of additional facilities in principle.

## Landfill Capacity Needs

**6.34** Some consultees felt that rather than designating new sites, an alternative solution to supplying additional landfill capacity was through using old quarries. It was suggested if local quarries were encouraged to supply local stone where they could, this would provide additional landfill sites on an ad hoc basis. This would have to be achieved by encouraging the quarries to be worked over a quicker period of time, to free up the capacity and potential to act as a landfill site. One of the problems however, is that as the impacts of mineral workings (noise, dust etc) can lead to local opposition to quarrying, it was considered by some that quarries are effectively sterilised. It was commented that as waste is produced by us all, the quicker and more locally it is disposed of, the better for all. In order to support this approach, permissions and restoration conditions should be re-visited to consider if better use of the land, the mineral resources, and the after use could be achieved.

## Zero Landfill Approach

**6.35** The comments relating to a Zero Landfill approach were supportive,

and although it was suggested that it may not be achievable, it should still be used to assess potential needs. It was considered landfill should always be the last option chosen, and even then for residual waste only after all the value has been recovered. Others indicated that a zero landfill policy should be within reach by the end of the plan provided that recycling targets continue to be extended.

## Transfer Capacity Needs

**6.36** It was the opinion of some that existing transfer stations are likely to need further capacity to effectively deal with waste if more recycling is to be achieved. In particular, there was felt to be a need for more storage facilities in transfer stations, as more and more items are being sorted into more detailed waste groups for re-use, which it was suggested, would increase as time goes on. Therefore it was considered that provision for the expansion of existing operational sites should be made within the plan.

### Core Strategy Key Themes 66

#### Future Capacity Needs

- Reasonable assumptions based on the data used;

#### Recycling, Recovery and Treatment;

- More capacity required;
- Changing technology and attitudes prevent assumptions about capacity needs;
- Flexible policy needed.

#### Landfill

- Zero landfill approach supported but may not be achievable;
- Inappropriate to provide new landfill sites;

- Landfill needs to be the last resort;
- Disused/worked out quarries could provide additional landfill capacity;

#### Transfer

- Existing transfer stations likely to need additional capacity;
- More storage facilities required to enable efficient sorting of waste;
- Plan should reflect the need for expansion of existing sites.

### Key Actions 64

- Consider how to deliver additional capacity;
- Analyse needs of new technology;
- Review the potential of quarries to act as landfill sites;
- Consider the potential for a zero landfill approach;
- Analyse the need for additional transfer capacity.

## Household Waste Recycling Sites and Transfer Stations

**6.37** There were comments made about the Eastwood site, pointing to the fact the site is located in the middle of the community. It was considered extraordinary by some that there is no other location elsewhere that could be found which would allow Eastwood to close. It was felt this site contravened almost every policy on waste management at a UK, European, and local level, with houses in close proximity to the site. Those objecting to the Eastwood Site felt that it did not reflect the overall waste objective, and were disappointed that there was no discussion as to how existing facilities met the objective, and requested that an alternative site was found elsewhere. It was suggested the Eastwood site failed to meet many of the proposed locational criteria for new waste sites in the consultation



document, and concern over the impact increased recycling and recovery of waste will have in terms of increased activity at the site. It was requested that the Core Strategy recognises the unsuitability of the this Site, and this in turn is used to inform the Land Allocations and Designations plan, to identify sufficient sites that meet the waste objective in respect of the Todmorden/Upper Calder Valley residents.

**6.38** Those commenting on general issues relating to this section recommended recycling sites and transfer stations should be located close to the main centres of population in order to minimise the need to transport waste and favour sustainable transport methods such as rail wherever possible.

**6.39** Other comments strongly supported the need for new developments to be designed to maximise efficient segregation and collection of waste for recycling, and this should be addressed in the planning stage; although it was recognised that provision of such areas is difficult in relation to existing buildings. It was also stated that as further transfer facilities are likely to be required, well designed and maintained recycling sites need to be provided, as it was felt the typical supermarket recycling area is untidy, dirty, and not emptied enough to encourage use.

### Core Strategy Key Themes 67

#### Household Waste Recycling Sites and Transfer Stations

##### Eastwood Site

- Objections to continued use;
- Objectors consider the site contravenes EU, National, and Local policies;
- No discussion as how the existing sites meet the proposed waste objective;

- Increased recycling will place additional strain on transfer sites such as Eastwood;
- Identify sites that meet the waste objective in terms of the Todmorden / Upper Valley residents;

#### General comments

- Recycling sites should be located close to main urban areas;
- Minimise the need for transport;
- Encourage sustainable transport of waste;
- Recycling areas should be designed into new developments;
- Recycling sites need to be well designed and maintained.

### Key Actions 65

- Consider Todmorden / Upper Calder Valley needs;
- Analyse impact of increased recycling levels on HWRS and Transfer stations;
- Consider traffic impacts;
- Investigate policies on Waste Segregation and Separation in new developments.

#### Additional Facilities

**6.40** The consultation document proposed two scenarios in relation to the number of additional facilities required; some felt these were too vague, and repeated the need for the Core Strategy to have a flexible policy that supports the provision of additional facilities in principle, which could provide facilities as and when they are required.

#### Landfill Facilities

**6.41** A flexible approach was also recommended for landfill facilities,

with agreement that landfill should be limited in line with the waste hierarchy. In connection with this, there was support for the proposal for development management policies limiting additional landfill sites, with strict controls on any proposed landfill operations. Again it was felt there wouldn't be a need to seek additional landfill sites, as capacity could be made available through former mineral sites. Whichever approach is adopted, the need for flexibility was emphasised.

## Location of New Facilities

**6.42** The proposed list of location types used to identify sites for new waste facilities brought agreement from some consultees, as they were felt to be in line with PPS10. Additional comments referred to the need to bear in mind needs for on farm agricultural waste management, and that brownfield sites can have biodiversity value when natural regeneration has occurred. Sustainable transport was also considered an issue.

## Safeguarding Existing Sites and Allocations

**6.43** There were few comments on this section, instead nearly all the safeguarding comments were made on the policy options. However, it was considered prudent in either scenario to review existing permitted sites in detail before they were offered as safeguarded.

## Planning Constraints

**6.44** There was support for the list of proposed constraints in relation to the historic environment, Special Protection Areas (SPA), Special Areas of Conservation (SAC), Sites of Special Scientific Interest (SSSI), whilst others suggested adding water abstractions, springs, rivers and other surface water features to the list. It was also recommended local wildlife sites and Biodiversity Action Plan habitats should be included. Other comments supported the 'Broad Areas of Search' approach, however there was no justification for automatically including all existing operational sites, since it was a flawed assumption that all existing sites meet current policy and guidance on suitable locations. The final suggestion was that existing operational sites within 250m of housing are excluded from the Broad

Areas of Search.

## Core Strategy Key Themes 68

### Additional Facilities

- Numbers in the two scenarios too vague;
- Policy needs to be flexible and support additional facilities in principle;
- Limit landfill in line with waste hierarchy;
- List of locations in line with PPS10;
- Brownfield sites can have biodiversity value;
- Sustainable transport of waste supported;

### Safeguarding Existing Sites and Allocations

- Review existing permitted sites before safeguarding;

### Planning Constraints

- Support for proposed list of constraints;
- Suggested additions to the list:
  - Water abstractions, springs, rivers, other surface water features;
  - Local Wildlife Sites, Biodiversity Action Plan Habitats;
  - Proximity to Housing.

## Key Actions 66

- Clarify additional requirements;
- Consider how to include flexibility in policy;

- Ensure policy is in line with waste hierarchy;
- Review existing sites;
- Review list of proposed constraints.

## Core Strategy Key Themes 69

### Policy Option MW8 - Broad Areas of Search (1)

1. The Core Strategy will identify Broad Areas of Search in order to direct applicants to the most appropriate areas the Council expect to see proposals for new waste management facilities.
2. The Broad Areas of Search will include existing allocated and operational sites.

### Policy Option MW9 - Broad Areas of Search (2)

1. The Core Strategy will identify Broad Areas of Search and Safeguarded Sites in order to direct applicants to the most appropriate areas the Council would expect to see proposals for new waste management facilities.
2. 'Safeguarded Sites' will apply to existing operational and those RCUDP sites that continue to be suitable.

### Comments on Policy Options

- There was evidence of support for Policy Option, MW8, although most of the comments emphasised that automatically safeguarding existing allocated or operational sites is based on the false assumption that all sites currently operating are in locations suitable for continued long-term use.
- There were many comments relating to Eastwood and policy MW8, putting forward the argument that as it is such an unsuitable site, safeguarding it would in effect reduce the potential for a more appropriate development on the site, in turn

preventing the local community gaining the benefits of a more appropriate development.

- It was suggested the wording of policy option MW8 be changed so that existing operational sites within 250m of housing are excluded from the Broad Areas of Search, which it was argued, would meet recommendations made in a government research study. Inappropriately located sites cause so much environmental degradation in communities that never wanted them in the first place.
- Other word changes recommended were to state that current waste transfer stations are too close to housing, and the distance at which existing operational waste transfer sites should not be included in the Broad Areas of Search should be determined according to current UK and European Legislation and common sense.
- Many of the same comments were also submitted against policy option MW9, requesting the wording was amended to indicate that existing operational sites within 250m of houses would not be classed as safeguarded sites; failure to do this would direct waste developments to areas that are unsuitable for this use. Operational and previously allocated sites should be subject to review before being included in any Broad Areas of Search.

## Key Actions 67

### Broad Areas of Search

Investigate a Broad Area of Search policy following:

- A review existing sites;
- Consideration of the impact of safeguarding sites;

## Core Strategy Key Themes 70

### Policy Option MW10 - Location of New Waste Facilities (1):

1. Proposals for new waste management facilities will be required to lie within the Broad Areas of Search (which include Operational Waste Sites or Existing Allocations);
2. Priority should be given to brownfield industrial land within the Broad Area of Search;
3. Proposals that seek to complement existing activities will be encouraged;
4. Any proposals for waste management facilities outside the Broad Areas of Search will be required to show why the site is suitable compared to others within the Broad Area of Search;

### Policy Option MW 11 - Location of New Waste Facilities (2):

1. Proposals for new waste management facilities will be required to lie within the Broad Areas of Search or within the Safeguarded Sites (Operational Waste Sites or Existing Allocations);
2. Priority should be given to existing waste allocations or brownfield industrial urban land within the Broad Area of Search and Safeguarded Sites;
3. Proposals that seek to complement existing activities will be encouraged;
4. Any proposals for waste management facilities outside the Broad Areas of Search or Safeguarded Sites will be required to show why the site is suitable compared to others within the alternative designations;

### Comments on Policy Options

- There was evidence of support for Policy Option, MW10, although most of the comments emphasised that automatically safeguarding existing allocated or operational sites is based on

the false assumption that all sites currently operating are in locations suitable for continued long-term use.

- There were many comments relating to Eastwood and policy MW10, putting forward the argument that as it is such an unsuitable site, safeguarding it would in effect reduce the potential for a more appropriate development on the site, in turn preventing the local community gaining the benefits of a more appropriate development.
- It was suggested the wording of policy option MW10 be changed so that existing operational sites within 250m of housing are excluded from the Broad Areas of Search, which it was argued, would meet recommendations made in a government research study. Inappropriately located sites cause so much environmental degradation in communities that never wanted them in the first place.
- Other word changes recommended were to state that current waste transfer stations are too close to housing, and the distance at which existing operational waste transfer sites should not be included in the Broad Areas of Search should be determined according to current UK and European Legislation and common sense.
- Many of the same comments were also submitted against policy option MW11; with specific requests that the wording was amended to indicate that existing operational sites within 250m of houses would not be classed as safeguarded sites; failure to do this would direct waste developments to areas that are unsuitable for this use. Operational and previously allocated sites should be subject to review before being included in any 'new areas of search'.
- Further comments relating to both MW10 & 11 welcomed the inclusion of a policy to encourage co-location, and that in terms of flood risk, the guidance within PPS25 should identify any waste sites which may be affected by flood risk.

## Key Actions 68

### Location of New Waste Facilities

This policy option will need to be developed following further work on the Broad Areas of Search policy and will therefore require the following:

- A review of existing sites;
- Consideration of the impact of safeguarding existing sites.

- It was also felt waste facilities are better placed in bigger conurbations where there is already background noise and pollution, and some objected to facilities in the Upper Valley.
- The principle should be to recycle at source as far as possible.

## Key Actions 69

### Scale of New Facilities

Investigate developing a policy that:

- Minimises the need to transport waste;
- Offers a range of facilities within or adjacent to main urban areas.

## Core Strategy Key Themes 71

### Policy Option MW12 - Scale of New Waste Facilities (1)

1. The Core Strategy will identify Broad Areas of Search that could accommodate a small number of larger scale facilities within or adjacent to the main urban areas.

### Policy Option MW13 - Scale of New Waste Facilities (2)

1. The Core Strategy will identify Broad Areas of Search that are dispersed throughout the district and could accommodate a range of different sized facilities.

### Comments on Policy Options

- Some consultees expressed a support for policy MW12, whilst others did not have a strong preference but wished to see facilities located in a way that minimises the need to transport waste.

## Core Strategy Key Themes 72

### Policy Option MW14 - Protection of Environmental Resources (1)

Proposals for new waste facilities will be subjected to a list of criteria as follows:

- Protecting Water Resources;
- Land Instability;
- Visual Intrusion;
- Nature Conservation;
- Historic Environment and Built Heritage;
- Traffic and Access;
- Air Emissions;
- Odours;
- Vermin and Birds;



- Noise and Vibration;
- Litter;
- Potential Land Use Conflicts.

## Policy Option MW15 -Protection of Environmental Resources (2)

Proposals for new waste facilities will be subjected to a list of criteria that ensure Locally and Nationally statutorily protected sites are not affected by any proposed development. A number of criteria which include these (and others) are suggested below:

- Protection of Calderdale's Rivers and Canals;
- Potentially Unstable Land;
- Conservation Areas, Listed Buildings, and Scheduled Ancient Monuments;
- Highway Capacity;
- Air Quality Management Areas;
- Pest control;
- Protection of local biodiversity, flora and fauna;
- Potential Land Use Conflicts;

## Comments on Policy Options

- There were mixed views in terms of policy options MW14 and MW15. Whilst there was specific support for both, many of the comments proposed additions or amendments to the wording. Comments that supported MW14 pointed out that this seemed more likely to take very local conditions into account, particularly those affecting amenity which is becoming very important in the siting of new technologies.
- In one instance, a consultee felt MW14 was the preferred policy but wished to add the introduction from MW15. Those proposing amendments to MW14 suggested expanding the following bullet points: "Nature conservation - including protection of local biodiversity, flora and fauna" and "Historic environment and built heritage including conservation areas".

- Policy MW15 was preferred by some as it made explicit reference to protecting the important environmental assets, although it should also be amended to refer to ensuring important statutorily protected sites are not adversely affected by proposed developments (as opposed to simply being affected).
- Others that preferred MW15 proposed amendments to the introductory sentence to read "Proposals for new waste facilities will be subjected to a list of criteria that ensure Locally and Nationally statutorily protected sites and other significant constraints are not affected by any proposed development....."
- Other comments recommended the penultimate bullet point of MW15 be amended to read "protection of local biodiversity, geodiversity, flora and fauna", and an additional bullet point to read "Protection of landscape character".
- There was also comment that whatever the final policy, the first bullet point - water resources should be reworded to read "Protection of water resources and the natural water environment".
- It was proposed that Historic Parks and Gardens be added to the list of constraints against policy MW15.

## Key Actions 70

### Protection of Environmental Resources

Develop a policy from MW14 & MW15 taking the following into account:

- Ensure local conditions are taken into account;
- Consider impact of new technologies;
- Consider how to include suggested amendments and additions to list of constraints and policy wording.

Waste



Core Strategy Key Themes 73

Policy Option MW16 - Transportation of Waste (1)

- 1. The Core Strategy will ensure that new waste facilities are located within a short distance of the main highway network, in order to minimise the localised impact of waste transportation.
- 2. Whilst acknowledging the constraints to the sustainable transport of waste within Calderdale, any innovative approaches to the Sustainable transport of waste will be welcomed;

Policy Option MW17 - Transportation of Waste (2)

- 1. The Core Strategy will ensure that new waste facilities are located in order to minimise the traffic impacts of waste transportation;
- 2. Whilst acknowledging the constraints to the sustainable transport of waste within Calderdale, any innovative approaches to the Sustainable transport of waste will be welcomed;

Comments on Policy Options

- The comments received on these policy options all supported MW17. Reasons for the support included the reference to

"minimising the traffic impacts" as opposed to MW16 which was ensuring they were located in close proximity to the main highway network.

- Minimising the impacts of waste transportation when making location decisions was also seen as important by the Highways Agency. The same consultee did express concern over the impact the Bradford - Calderdale waste partnership initiative will have on the Strategic Road Network, since the route from Calderdale to the proposed site in Bradford is likely to entail use of the M606. However, they did acknowledge there will be some compensatory reductions in the movement of waste to landfill sites in Oldham, Bury, and Wakefield as a result of the waste partnership.
- Overall, any reduction in the need for landfill was considered to be of some benefit to the Strategic Road Network as it would remove some HGV movements from the Motorways each day, and policies in line with the waste hierarchy would support such a reduction in the transport of waste.
- Other comments supporting MW17 felt that it was preferable as it did not explicitly favour road transport.

Key Actions 71

Transportation of Waste

- Develop Policy Option MW17
- Place emphasis on minimising the traffic impacts;
- Ensure all policies are in line with waste hierarchy;
- Consider any sustainable transport options.

## Core Strategy Key Themes 74

### Policy Option MW18 - New Housing and Commercial Developments (1)

1. All new and converted residential, commercial and community developments should be designed with the increasing requirements for waste separation and segregation and storage in mind.

### Policy Option MW19 - New Housing and Commercial Developments (2)

1. All major\* new and converted residential, commercial and community developments are required to be designed with the increasing requirements for waste separation and segregation and storage in mind.

(\* Major in this case could be considered to mean 10 or more dwellings, 1000sq metres gross of commercial floor space.)

### Comments on Policy Options

- There was support for policy option MW18, and also a comment made that whichever policy was finally preferred, all new developments should be required to be built with adequate provision for waste segregation and storage which fits with locally available services.

## Key Actions 72

### New Housing and Commercial Developments

Develop policy MW18 whilst considering the following:

- How to secure the adequate provision of waste segregation and storage, which fits in with locally available services.



7 Young People

**7.1** The Development Strategy Team worked closely with Children and Young Peoples Participation Project to try and get the views of young people into the Core Strategy. This involved a letter to all 104 schools within Calderdale, including the three private schools, together with follow-up phone calls, visits to schools and some young people attending the workshops. The Calderdale Young Inspectors also contributed by meeting and talking with other young people as well as producing a questionnaire to see what young people would like to see in the future.

**7.2** During the consultation we got views from 8 schools through the school councils which included in excess of 200 young people. In addition 91 young people were surveyed through the work of the Young Inspectors Programme. The assistance of Children and Young Peoples Participation Project and the Young Inspectors together with the enthusiasm of the schools involved has been invaluable in helping get the views of young people in the consultation.

Young Inspectors

Introduction

**7.3** A team of 8 Young Inspectors consulted with 91 children and young people through a survey about Halifax Town Centre, asked what young people liked and would change about their area on Facebook and also had a discussion amongst the Young Inspectors Team about Halifax.

Survey

**7.4** The survey was undertaken with 15 different children and young people in McDonalds and Halifax Bus Station. The main themes which came out of the survey were that children and young people generally liked the town centre particularly because of the shops, there were no cars and it was a welcoming place. Most of the children and young people visited Halifax town centre to meet friends and family as well as for the shopping and food outlets. Whilst the town feels safe during the day many

thought the town unsafe on an evening.

**7.5** When asked what they would change about Halifax town centre the 15 children and young people surveyed said they would like a bigger and better range of shops and other town centre uses, more car parking, safer on an evening and generally tidy and free of litter.

Core Strategy Key Themes 75

- Retain current ‘feel’ of Halifax Town Centre;
- Provide a bigger and better range of shops and other town centre uses;
- Increased car parking;
- Making the town feel safer whilst enhancing the night-time economy

Facebook pages

**7.6** The Young Inspectors went on to their Facebook accounts and asked their fellow peers what they liked about their area and what they would like to see change in their area in 20 years time. Altogether views from 60 children and young people were received from across Calderdale.

**7.7** The things the children and young people currently liked were very varied but the main types of things included; shops and food outlets, leisure facilities such as football fields and the new cinema being built, churches, the town hall, Calderdale College, the woods and river, housing, bus station and libraries.

**7.8** The children and young people wanted to see a lot of changes in the future the main themes included; an improved bus station, more jobs opportunities, an improved range of shops and town centre uses, more sports and leisure facilities including improved play areas, improvements to the environment including more open spaces, nature reserves and trees, friendlier areas and to keep the library. There were conflicting views about



housing with some wanting more and others less.

## Core Strategy Key Themes 76

- Protecting and enhancing the environment;
- Providing a bigger and better range of shops and other town centre uses;
- More opportunities for leisure and recreation;
- Providing more job opportunities;

## Young Inspectors Discussion

**7.9** The Inspectors had a discussion amongst themselves as young people living in Calderdale. These are the findings about Halifax town centre from the 16 who took part. The group liked the shops, food outlets and leisure opportunities available in the town centre they also liked the train station and cultural things to see and do such as the Piece Hall. However they also thought they needed more activities and shops for teenagers, that parking was not free, there were not enough jobs in the town centre, the town was not safe and they thought it was messy in the market.

**7.10** The types of things the Young Inspectors wanted to see in 20 years time were very varied. Some of the main types of changes they wanted to see were; more open spaces and better pedestrian areas, more services and activities for young people and families, better places to eat, a safer, cleaner town centre with less anti-social behaviour and more police, more jobs, more car parking and more overnight accommodation.

## Core Strategy Key Themes 77

- Need to enhance and increase open spaces and pedestrian areas in the town centre;

- Provide a bigger and better range of town centre uses and activities;
- More car parking;
- Provide more job opportunities;
- More overnight accommodation.

## Conclusions

### Key Actions 73

- Consider how the character of Halifax can be retained whilst also providing a bigger and better range of shops, entertainment and other town centre uses including parking;
- Consider how to make the town centre safer through the design of new buildings and restricting certain uses;
- Providing more jobs within and around the town centre; and
- Improving and increasing public open spaces;

## Schools

### Introduction

**7.11** All schools across Calderdale were invited to take part in the consultation. In total 8 different schools decided they would like to be involved. Whilst the consultation was tailored for each individual school it was generally undertaken with the School Council who often then took this to the rest of the school for discussion. The majority of the schools consultation was undertaken by the Children and Young Peoples Participation Project who provided excellent support both to the Development Strategy Team and the schools involved.



## Parkinson Lane Community Primary School, Halifax

**7.12** Twelve members of the School Council held a discussion with an officer from the Development Strategy Team about what they wanted to see in 20 years time. Some of the suggestions included;

- Bigger houses that are good quality.
- More jobs and career opportunities.
- Outstanding schools in our area which need some financial reward/backing to maintain standards.
- Shopping complex, supermarkets/clothing.
- A safer environment - robberies – more police available.
- More museums and educational places.
- More plants, trees, nature and walking areas.
- Less takeaways – will impact on healthy wellbeing and litter.
- Adventure facilities.
- More youth clubs.
- Building multi-purpose religious studies buildings.
- Better/more efficient public transport.
- Better road safety measures in place/cycling lanes.

### Core Strategy Key Themes 78

- Improving local housing;
- Provide more jobs in the area;
- Improvement of shops;
- To encourage the use of religious and community buildings for multiple purposes;
- Better public transport;
- Improved and increased green areas including walking areas;
- More facilities/ activities for children and young people.

## Whitehill Community Trust School, Illingworth

**7.13** Eleven pupils from the School Council were asked to look at a map of the area around the school and consider what they liked about the area and what they would like to change. From the comments it is clear that the pupils like living in the area and value their local environment. However they have concerns over crime, litter and anti-social behaviour and would like to see all of these improved together with more open spaces and activities for young people.

**7.14** The things they liked included; school playground, local pubs, park, sids sweet shop, friends, family and neighbours, buses, Halifax in general, school, post office, the view and lots of green areas.

**7.15** The things they wanted to see change included; less crime, less litter, less anti-social behaviour, a swimming pool, more green spaces and parks, recycling, more doctors and dentists, more jobs, help for the elderly, more car parks, safer roads.

Picture 7.1 Whitehill School ideas



## Core Strategy Key Themes 79

- The need to protect parks, play areas, countryside and shops in the area;
- Provide more and improved safe play areas;
- Provide more leisure opportunities for young people;
- Provide more jobs in the area;
- More services such as doctors and dentists.

### Ling Bob JI&N School, Pellon

**7.16** The School Council discussed the consultation and then went back to their classes to ask them what they liked about their area, what they didn't like about the area, what they thought the area needed in the future and if they thought there was anywhere where new buildings or parks should be built.

**7.17** Responses were received from 5 classes including over 120 pupils ranging in age from 6 to 11. The comments indicate the pupils like living in the area and enjoy the open spaces and countryside. However they have concerns about anti-social behaviour and would like to see more playgrounds and activities for young people. The main comments were;

- They liked the people in the area, living near the school, local shops, the moors and open spaces.
- They didn't like litter and dog mess, the lack of play areas and anti-social behaviour.
- They wanted to have more parks, playgrounds and indoor games areas, more jobs, youth clubs, bins, police presence, universities and shops
- They thought new shops, play areas (indoor and outdoor) could be built near the school.

## Core Strategy Key Themes 80

- The need to protect parks, play areas, countryside and shops in the area;
- Provide more and improved play areas;
- Provide more leisure opportunities for young people.

### Holywell Green Primary School

**7.18** Seven pupils from the School Council were asked to look at a map of the area around their school and consider what they liked about the area and what they would like to change. The pupils liked the friendliness of the area as well as the views and setting and wanted to keep much of the area as it is although they did want some more shops.

**7.19** The things they liked included; their house, friends, park, school, fields and views, safe and a good fish and chip shop. The things they wanted to see change include; streets cleaner, more shops, bus station, hospital and less houses.

**Picture 7.2 Holywell Green School ideas**



Core Strategy Key Themes 81

- The need to protect the countryside;
- Provide more and improved services and facilities including shops;
- Improved public transport.

Riverside Junior School, Hebden Bridge

**7.20** The School Council discussed the changes they would like to see in Hebden Bridge over the next 15 or 25 years. Years 3 and 4 wanted to see a swimming pool/leisure centre built, less litter, more responsible dog owners, a solution to the massive car parking problems, a wider range of shops including a sports shop, music shop, affordable children's clothes. They also wanted more planted pots and hanging baskets, pedestrianised Holme Street, Hebden Bridge in Britain in Bloom and better behaved and responsible young people.

Year 6 wanted to see a toddler gym, bigger 3D multi screen cinema, fountains in the pedestrianised areas, mini golf in the park, more community police and CCTV, a fire station and old buildings renovated.

Core Strategy Key Themes 82

- The need to encourage renovation of old buildings;
- A wider variety of shops in Hebden Bridge;
- Dealing with Hebden Bridge car parking issues;
- More pedestrianisation of Hebden Bridge town centre;
- More and improved leisure facilities for all ages.

Castle Hill Primary School, Todmorden

**7.21** Ten pupils from the School Council were asked to look at a map of the area around their school and consider what they liked about the area and what they would like to change. The pupils liked the area with comments about it being in the 'middle of cool cities' and good parks. However they did want changes including more activities for young people and more shops.

**7.22** The things they liked included; its location between cities, countryside, park and friends and family. The things they wanted to see change included; cheaper transport, market open more often, a cinema, a new school, more services (doctors/hospitals), skate board park, more shops and cycle park/tracks.

Picture 7.3 Castle Hill School ideas



## Core Strategy Key Themes 83

- Improved public transport;
- The need to protect the countryside;
- Improved leisure and cultural activities for young people such as a cinema, skate park;
- More services such as doctors/ hospital;
- More shops.

### Rastrick High School

**7.23** The student leadership group from Rastrick High School discussed the things they liked about Brighouse and Rastrick and what they would like to see changed. Many of the comments related directly to the school but it is clear from the comments the students are proud of their area and school but want to see it improve.

**7.24** Some of the things they wanted changing about the area were; improvements to the school, more bins and shops, better facilities such as a sports centre, play area or cinema and a better bus station in Brighouse.

## Core Strategy Key Themes 84

- Improved facilities including a sports centre/cinema/ play area;
- More shops;
- Better bus station in Brighouse.

### Scout Road Primary School, Mytholmroyd

**7.25** A total of 29 pupils were asked to look at a map of the area around their school and consider what they liked about the area and what they

would like to change. The comments indicate that they like being close to the countryside but also appreciate the shops and services in Mytholmroyd. They wanted to see more shops and things for young people to do.

**7.26** The things they liked included; the shops, playing fields and park, it's a clean place to live, the countryside and views, library, clubs and activities and being around friends and family. The things they wanted to see change included; more vegetable growing (similar to Incredible Edible Todmorden), more wildlife, more shops, more activities for young people.

Picture 7.4 Scout Road School ideas



## Core Strategy Key Themes 85

- The need to protect the countryside and wildlife;
- Improved activities for young people;
- Protect existing services;
- Better opportunities to grow food



## Disabled Youth Forum

**7.27** Twelve members of the Disabled Youth Forum aged between 15 and 19 years old discussed what they would like to see improve in Calderdale for young people and the local community. A total of 22 comments were made, those most relevant themes to planning included;

### Core Strategy Key Themes 86

- More things to do;
- More drops on curbs – easier access for wheelchair users;
- More jobs;
- More banks, more shops;

## Conclusions

### Key Actions 74

- The Core Strategy needs to consider how to provide more jobs;
- Need to protect and improve our parks, open spaces and countryside;
- A better range of shops and things to do in our town centres;
- Identify public transport improvements wherever possible; and
- Provide protection for public services.



## 8 Planning Aid

**8.1** The Development Strategy Team worked closely with Yorkshire Planning Aid (YPA) to set up a series of workshops with communities and groups who are disadvantaged, in line with the definition in the National Planning Aid Delivery Plan. YPA is part of a network of services run by the Royal Town Planning Institute, a registered charity. YPA offers free, independent and professional planning advice to community groups and individuals who cannot afford to pay professional fees.

**8.2** The activities undertaken by YPA are not part of central or local government but are an independent source of advice and information which complement the work of local councils.



**8.3** In total 9 workshops were arranged by Planning Aid the full reports for these events can be found on the Councils website. In organising the events Planning Aid were also assisted by Calderdale MBC, Ovenden & Mixenden Initiative, Halifax Central Initiative, Calderdale College, Help the Aged and Trans-Pennine Housing.

### Tenants and Residents Association

**8.4** This event, held at the Halifax Central Library, was attended by 14 tenants and residents. The session commenced with an introduction to Yorkshire Planning Aid, the Core Strategy and the consultation. This was followed by 2 facilitated group discussions of spatial issues relevant to attendees and associated policy issues.

**8.5** The residents were split into two groups a Halifax and non-Halifax group dependent upon where they lived. The main themes relevant to Halifax were that it is generally a good place to live but needs investment in new infrastructure including schools, health facilities and public transport. Whilst new housing development was not discounted it was considered this should be focused on previously developed land and a mix of types and tenures should be provided including homes built to lifetime homes standard and starter homes for young families.

**8.6** The main themes which emerged from the non Halifax residents again indicated that infrastructure provision was key to any new development and if new housing was to occur a mix of types were required including for first time buyers. Other specific issues raised about different towns included;

- Brighouse - should not be a dormitory for Leeds and Manchester, a need for investment in highways, schools and health facilities, and unfair competition from supermarkets;
- Southowram - was already congested and if more housing did occur it would make this worse, in addition affordable housing was needed;
- Elland - required a new petrol station and larger houses;
- Sowerby Bridge - the poor access to the railway station needed to be addressed, a lack of shops in the town centre, night time drinking was a major issue and the capacity of local schools.

**8.7** The key points from the Tenants and Residents Group are;

### Core Strategy Key Themes 87

- Infrastructure improvements are required, specific concerns were congested roads, lack of doctors surgeries, loss of post offices and a high demand for school places;
- Large supermarkets were seen to provide unfair competition to local shops, impacting upon the town centre;

- It was generally accepted that new housing, jobs and other development was required given an increasing population; and
- Future housing should be 'housing for life' and focus should be put on affordable homes.

**Key Actions 75**

- A realistic and deliverable Infrastructure Delivery Plan needs to be developed to reflect current deficits in infrastructure and future growth;
- Continued consideration of the impact of supermarkets on town centres - the Retail Needs Study should provide the starting point; and
- Consider the need for affordable housing and 'housing for life' across the district.

**Boothtown Residents**

- 8.8** This event, held at the Rawson School, was attended by 9 residents. The session commenced with an introduction to Yorkshire Planning Aid, the Core Strategy and the consultation. This was followed by a facilitated group discussion of spatial issues relevant to Boothtown/North Halifax and associated policy issues.
- 8.9** The discussions concentrated on the possibility of an 'urban village with up to 2000 new homes' as well as other issues such as employment, schools and housing. Participants indicated they were not against development in the area, but the proposed amount was a concern.
- 8.10** More specific themes which emerged from the discussions;

**Core Strategy Key Themes 88**

**Urban Village**

- Didn't want existing places such as Ovenden and Boothtown to be joined-up under the concept of an 'urban village'; and
- Good idea if its about sharing resources but no need to re-brand our areas.

**Housing**

- Concern over facilities and services to provide for the new houses including roads; and
- Need a mix of house types to accommodate a range of circumstances.

**Schools**

- There would be a need for more schools if new housing was developed as current schools (in the area) at capacity.

**Employment**

- Need for small business start-ups but may need to be incentives;
- There are existing opportunities with land available;
- They thought there was an existing workforce for new businesses in the area; and
- *'There's high unemployment in the area, so why encourage new people to come in when there's people already here in need of a job'*

## Key Actions 76

- The proposals for an 'urban village' in North Halifax need more detailed consideration ensuring facilities, services and countryside can be adequately protected;
- The provision of new services and facilities, including new schools, to accommodate growth needs detailed consideration; and
- Policies should aim to encourage small business start-ups should be encouraged (this could be on existing allocations or in other ways).

## Illingworth Residents

**8.11** This event took place at St. Catherine's Catholic High School in Holmfield with 10 residents from the Illingworth area. The session commenced with an introduction to Yorkshire Planning Aid, the Core Strategy and the consultation. This was followed by a facilitated group discussion of spatial issues relevant to Illingworth and associated policy issues.

**8.12** The discussions were concentrated on issues within Illingworth and the potential for up to 2000 new homes in North Halifax. Residents were concerned about the number of homes the impact upon services and facilities in the area and questioned whether the homes would be filled.

**8.13** The full planning aid report from the Illingworth Residents event is available on the Council website at [www.calderdale.gov.uk](http://www.calderdale.gov.uk), a brief summary of the main themes are included below;

## Core Strategy Key Themes 89

### Housing

- Concern about the potential number of new homes in the area;
- Scepticism about the likelihood of facilities coming alongside new developments; and
- The impact of new development on the Illingworth area and in particular poorer residents, and the likelihood of the new facilities benefiting just those living in new developments and not the wider Illingworth community;

### Other issues

- Public transport considered poor, particularly Holmfield area;
- Concern over quality and availability of open spaces; and
- Concern over how new jobs could be accommodated.

## Key Actions 77

- The proposals for an 'urban village' in North Halifax need more detailed consideration ensuring facilities, services and countryside can be adequately protected;
- The possibility of assisting the provision of new services and facilities in the area needs consideration; and
- More accessible open spaces.

## Mixenden Residents

**8.14** This event, held at the Holy Nativity Church, was attended by 19 residents. The session commenced with an introduction to Yorkshire

Planning Aid, the Core Strategy and the Refined Issues and Options consultation. This was followed by 2 facilitated group discussions of spatial and policy issues relevant to Mixenden.

**8.15** The discussions understandably concentrated on the possibility of an 'urban village with up to 2000 new homes'. In principle some thought a new urban village could be okay: it would give a better choice of housing and possibly better facilities. Affordable housing should be included. They wanted reasonable growth to justify new facilities.

**8.16** The full planning aid report from the Mixenden Residents event is available on the Council website at [www.calderdale.gov.uk](http://www.calderdale.gov.uk).

**Core Strategy Key Themes 90**  
**North Halifax 'Urban Village'**

- Concern will require development of green fields;
- Scope for new housing should be limited by jobs, skills and community facilities;
- Need to consider state of the roads and public transport;
- Lot empty houses in the area already; and
- Area densely populated and deprived these proposals could make it worse.

**Housing Issues**

- Need affordable housing for first time buyers;
- Need bungalows for older people; and
- All housing should meet lifetime homes standard.

**Services and Facilities**

- Mixenden needs a mini-supermarket;

- Local schools full, would be good to have bigger schools with more opportunities; and
- Need more facilities including a pub.

**Employment**

- Not enough jobs in the area, particularly well paid jobs; and
- Good access to the town centre jobs

**Open Spaces, sports facilities, countryside etc.**

- Prioritise brownfield development and protect green areas and countryside;
- More sports areas, possibly a small sports centre are required;

**Transport**

- A629 busy;
- Public transport generally good, but expensive;
- Need a new bus service to access jobs in Holmfield.

**Key Actions 78**

- The proposals for an 'urban village' in North Halifax need more detailed consideration ensuring facilities, services and countryside can be adequately protected;
- Access to employment needs to be improved where possible;
- The possibility of assisting the provision of new services and facilities in the area needs consideration.

**Sowerby Bridge Residents**

**8.17** The Sowerby Bridge residents event was held in St. Paul's

Methodist Church on 14th February 2011 and was attended by 13 residents. The format was a short presentation about Planning Aid followed by a discussion of the main points within the consultation documents which affected them.

**8.18** The majority of the discussion revolved around possible increases in housing, lack of jobs, congestion and need to improve the town centre as well as public transport.

**8.19** It is also useful to note that some comments at the event related to a current planning application at Copley, unless the comments have direct relevance to the Core Strategy they have not been included in this summary. The full comments can be found on the Council website at [www.calderdale.gov.uk](http://www.calderdale.gov.uk).

## Core Strategy Key Themes 91

The residents were generally supportive of improving Sowerby Bridge town centre including the Holmes Road area. However they wanted low to medium rise development so views could be seen through the area. Other topics discussed were;

### Housing

- Concern about the impact of new housing on facilities, services, roads and pollution and how Sowerby Bridge would cope;
- Housing on Holmes Road was considered acceptable;
- Demolish old flats and re-build;
- Houses need gardens;

### Jobs

- Jobs need to be close to existing settlements - thought Kirklees MC proposals at Cooper Bridge and Ainley Top would be too remote;
- Sowerby Bridge has become a dormitory - need more people living and working here;

### Transport

- Access to the train station is poor - needs improving;
- More trains/carriages required;
- Not enough parking in the town;
- Roads very congested at peak times;
- Buses expensive;

### Open space

- Need an area where people can gather, hold events;
- Lockhill Mills would be a good open space, centrally located;

### Community facilities

- Re-use the old pool building for community purposes such as dances, conferences etc;

### Shops

- Need a greater variety of shops;
- Need more daytime uses in the town and more tourist facilities;

### Green belt

- Shouldn't extend towards Luddendenfoot as eroding character as a town surrounded by countryside.



Key Actions 79

- Continue to pursue improvements to Sowerby Bridge town centre including improved access to the railway station, re-development of Holmes Road area, new open spaces and improve range of shopping;
- Encourage job growth within the town including facilities for tourists;
- Congestion in the town needs to be dealt with; and
- Retain any growth in the town within the existing built-up area boundary.

Calderdale College

**8.20** A total of 63 Calderdale College students took part in these events over 2 days in early March 2011. The sessions commenced with an introduction to Planning Aid, followed by facilitated group discussions of planning issues relevant to attendees.

**8.21** The first part of the facilitated discussions asked students what they found good or bad about where they lived. The table below provides a summary of some of the more common themes relevant to the Core Strategy. The full list of comments can be found within the relevant Planning Aid reports available on the Council website.

Table 8.1 Students responses about what is good or bad about their area

Area	Good	Bad
Brighouse	<ul style="list-style-type: none"><li>• Good new bus station</li><li>• Nice welcoming housing estates</li></ul>	<ul style="list-style-type: none"><li>• Lack of facilities for young people</li><li>• Fast food outlets too far from town centre</li></ul>

Area	Good	Bad
Southowram	<ul style="list-style-type: none"><li>• Nice area</li><li>• Football fields</li><li>• Quiet</li></ul>	<ul style="list-style-type: none"><li>• Traffic</li><li>• School with low wall</li></ul>
Shelf	<ul style="list-style-type: none"><li>• Quiet</li></ul>	<ul style="list-style-type: none"><li>• Lack of buses</li></ul>
Halifax	<ul style="list-style-type: none"><li>• Building a new cinema/ shops/ restaurant</li><li>• Public transport</li><li>• Shops and facilities</li><li>• Takeaways</li><li>• Leisure facilities</li><li>• Night-life</li><li>• Countryside and environment</li><li>• Housing</li><li>• Traditional buildings/ history</li><li>• Small town</li><li>• College</li><li>• Mosque</li><li>• Supermarkets</li><li>• HBOS building</li></ul>	<ul style="list-style-type: none"><li>• Lack of good shops, need a Primark, no indoor shopping</li><li>• Need more facilities/ things for young people to do</li><li>• Takeaways</li><li>• Night-time economy creating trouble</li><li>• Too many taxi ranks</li><li>• Bus station</li><li>• Train station</li><li>• College</li><li>• Borough Market</li><li>• Anti-social behaviour</li></ul>
Mytholmroyd	<ul style="list-style-type: none"><li>• Quiet</li><li>• Countryside</li><li>• Community centre</li><li>• Pubs</li><li>• Takeaways</li></ul>	<ul style="list-style-type: none"><li>• Lack of facilities for young people</li><li>• Poor parks</li><li>• Lack of shops</li><li>• Poor train service</li></ul>
Sowerby Bridge	<ul style="list-style-type: none"><li>• Views</li><li>• Night-life and restaurants</li><li>• Takeaways</li><li>• Supermarket</li></ul>	<ul style="list-style-type: none"><li>• Too much housing</li><li>• Bus services</li><li>• Lack of facilities for young people (youth centre,park, etc)</li></ul>

Area	Good	Bad
Todmorden	<ul style="list-style-type: none"> <li>Youth clubs</li> <li>Markets</li> <li>Large park</li> </ul>	<ul style="list-style-type: none"> <li>Derelict factories</li> <li>Lack of 'designer' shops</li> </ul>
Luddendenfoot	<ul style="list-style-type: none"> <li>Easy transport</li> <li>Local shops</li> <li>Low traffic</li> </ul>	<ul style="list-style-type: none"> <li>Kershaw estate</li> <li>Lack of facilities/ activities</li> <li>Anti-social behaviour</li> </ul>
Hipperholme	<ul style="list-style-type: none"> <li>Takeaways</li> <li>Pub</li> </ul>	<ul style="list-style-type: none"> <li>Buses</li> <li>Anti-social behaviour</li> </ul>
Illingworth	<ul style="list-style-type: none"> <li>Proximity to town, college</li> </ul>	<ul style="list-style-type: none"> <li>Parking</li> <li>Lack of things to do</li> <li>Anti-social behaviour</li> </ul>
Mixenden	<ul style="list-style-type: none"> <li>Takeaway</li> <li>Buses</li> <li>Open spaces</li> <li>Youth club</li> </ul>	<ul style="list-style-type: none"> <li>Rundown</li> <li>Unemployment</li> <li>Anti-social behaviour</li> </ul>
Warley	<ul style="list-style-type: none"> <li>Close to town, college</li> </ul>	<ul style="list-style-type: none"> <li>Anti-social behaviour</li> </ul>
Elland	<ul style="list-style-type: none"> <li>Nice area</li> <li>Good college</li> </ul>	<ul style="list-style-type: none"> <li>Amount of flats</li> <li>Anti-social behaviour</li> </ul>

**8.22** The initial discussions were followed up with a chat about a wide range of policy issues covered within the Core Strategy. These issues included housing, jobs and specific points about how the Core Strategy could improve individual towns and villages.

## Core Strategy Key Themes 92

### Housing

- New houses will lead to more congestion;
- Brownfield land should be used first, concern over losing greenfields and wildlife habitats
- Energy efficient housing may cost more putting developers off;
- Mixed house types and tenures with more affordable housing required;
- Locate housing near centre for good transport;
- Keep private and social housing separate.

### Jobs

- Need for more jobs;
- Jobs should be easy to get to, central;
- Need affordable space to set up small businesses.

### Shops, Services, Facilities

- Facilities in Halifax poor compared to Bradford, Huddersfield
- Need more shops in town centre;
- Need more leisure facilities and things for young people. Split between those who thought new leisure should be concentrated in towns and those who thought should be dispersed.

### Open Spaces

- Enough parks but mostly poor quality;
- Need more all weather pitches;
- Keep open spaces;
- Should be a park within 10 minutes walk of everyone.

### Design, Historic Buildings

- Preserve some old buildings, but allow for modern interiors;
- Library good modern building;
- Need more modern buildings in Halifax;

- Makes sense for new buildings to be energy efficient
- Better design required for new buildings.

## Transport

- Public transport expensive;
- Better buses with a higher frequency and more routes;
- Widen roads to include bus lanes;
- Bike scheme would be a good idea;
- Improve and create more paths;
- Trains don't stop at all stations;
- Congestion in some places;
- Make developments pay towards infrastructure;
- Railway station in Elland good idea.

## Energy/Climate Change

- Wind farms don't look that bad
- Climate change is a big issue - tackling it is more important than adverse visual impact on countryside;
- Concern how wind farms look close to homes;
- Water power should be used;
- Solar panels good idea
- Need to meet our own energy needs - potential for local generation.

## Halifax

- Development and enlargement of Halifax town centre for shops, offices etc. a good idea as it's accessible from everywhere else;
- Use empty buildings in the town;
- Piece Hall needs bigger shop units - put a roof on it, could hold markets there, current events are good;
- Indoor market is very good;
- Build an arena in Halifax?

- More affordable housing;
- Need more shops and facilities in North Halifax;
- Some concern over urban village idea, others thought good idea;
- Need indoor bus station and better facilities.

## Brighouse

- Improve canal so nice place to walk and spend time;
- Traffic not that bad;
- Needs leisure facilities;
- Wellholme park has been really improved.

## Mytholmroyd

- Need better public transport, more buses and more trains stopping here;
- Swimming pool required;
- Vision for 2026 should not just read 'remains the primary location for retail, employment and leisure facilities in the area...' as needs lots of improvement.
- Lots people commute out - need more local jobs.

## Key Actions 80

The comments from the students have many similarities with those from other groups and sessions however particular issues for the Core Strategy to consider include the following;

- Provide a positive framework for improving facilities and services across Calderdale, including for young people;
- Provide the land and policies which enable appropriate job growth in a range of sectors;
- Promote the use of renewable energy;

- Preserve the historic environment but allow for modern buildings and uses;
- Improve connectivity by influencing the location of new development, lobbying for better public transport and improving walking/cycling opportunities;
- Provide opportunities to increase the size of Halifax town centre to incorporate a greater range of shops as well as offices and leisure uses; and
- Aim to improve the range of shops in all centres, including Mytholmroyd.

## Over 50s Workshop

**8.23** Thirteen residents attended the Planning Aid Over 50s workshop at the Shay Stadium on 10th March 2011. The session began with a short introduction about Planning Aid and the Core Strategy. This was followed by 3 facilitated group discussions of spatial issues relevant to the over 50s and associated policy issues. The group discussions focused upon what the attendees liked or disliked about where they lived and was then followed by topic related issues. A full report on this workshop is available on the Councils website.

**8.24** The following table summarises the likes and dislikes, which are related to planning, in the different areas;

**Table 8.2 The likes and dislikes of where the Over 50s live**

Area	Good	Bad
Brighouse	<ul style="list-style-type: none"> <li>• Close to Motorway</li> <li>• 2 Major supermarkets</li> <li>• Excellent new swimming pool</li> </ul>	<ul style="list-style-type: none"> <li>• Lack of free parking</li> <li>• Lack of and choice of shops</li> <li>• Not enough focus on canal</li> <li>• Not enough GP's for growing population</li> </ul>

Area	Good	Bad
Southowram	<ul style="list-style-type: none"> <li>• Not overcrowded, quiet and clean</li> </ul>	<ul style="list-style-type: none"> <li>• Poor bus service</li> </ul>
Halifax (Skircoat Green)	<ul style="list-style-type: none"> <li>• Local shops</li> <li>• Good transport</li> <li>• Large open spaces</li> <li>• Good variety of housing</li> </ul>	<ul style="list-style-type: none"> <li>• Noise pollution from Hospital</li> <li>• Lack of parking</li> <li>• Traffic</li> <li>• Not enough buses</li> <li>• Too many apartments</li> <li>• Loss of community facilities and pubs</li> <li>• NIMBY – resistant to change</li> </ul>
Halifax (Savile Park)	<ul style="list-style-type: none"> <li>• Heath House, New Surgery</li> <li>• Access to Town/ Theatres/ PeoplesPark</li> </ul>	<ul style="list-style-type: none"> <li>• Poor bus service</li> <li>• Poor accessibility on footpaths</li> <li>• No specific roadways for mobility scooters</li> </ul>
Mytholmroyd	<ul style="list-style-type: none"> <li>• Countryside for hills and walking</li> <li>• Health centre</li> <li>• Safe</li> <li>• Nice local Church</li> </ul>	<ul style="list-style-type: none"> <li>• No employment</li> </ul>
Sowerby Bridge	<ul style="list-style-type: none"> <li>• Nice park/ open land</li> <li>• Swimming Pool</li> <li>• Shops</li> <li>• Housing (in some areas)</li> </ul>	<ul style="list-style-type: none"> <li>• Road – Bottleneck</li> <li>• Parking</li> <li>• Need to improve public transport</li> <li>• Poor pavements</li> <li>• Too many pubs</li> </ul>
Todmorden	<ul style="list-style-type: none"> <li>• Good community – sense of ownership, facilities, village feel, local groups</li> <li>• Market shopping and village shops</li> </ul>	<ul style="list-style-type: none"> <li>• Need more jobs but not service industries</li> <li>• Need to keep education facilities, not close them</li> <li>• No more houses on green spaces</li> </ul>

Area	Good	Bad
		<ul style="list-style-type: none"><li>• Trains do not stop</li><li>• Housing being built all over, yet there are Brownfield sites still empty</li><li>• Sense of powerlessness e.g. local people don't want new supermarkets, yet we get them</li><li>• Poor road crossings near Health Centre</li></ul>
Warley	<ul style="list-style-type: none"><li>• Village Centre is off the main road</li><li>• Surrounded by fields and trees</li><li>• Allotments and Children's Play Areas</li><li>• Buses are generally on time</li></ul>	<ul style="list-style-type: none"><li>• Lack of shops, have to shop in Halifax town</li><li>• Real accessibility problems for the most elderly</li><li>• No post office , nearest one at Highroad Well</li><li>• Too much traffic</li><li>• Not many buses</li></ul>

8.25 The discussions about policy issues were wide ranged from housing, jobs, employment and transport to Halifax town centre.

### Core Strategy Key Themes 93

#### Housing

- Need for affordable housing for all age groups (should be 100% affordable not just 30%);
- No more flats/tower blocks or 4/5 bed houses;
- Need to ensure new facilities/services come with developments;
- Need to cater for the needs of elderly, disabled etc. - Good to see lifetime homes, albeit just 10%;
- Locate near employment areas;

- Housing should be good quality - last longer;
- 'Posh' housing in the countryside may work;
- If housing is good quality in North Halifax then it could work;
- Mixed Council and Private Housing on the whole works;
- Ensure housing quality and space standards are maintained.

#### Employment

- Need affordable office accommodation in town centres, especially for voluntary groups;
- Areas between Todmorden and Hebden Bridge may benefit from new employment centres;
- Lack of jobs so we are losing well educated young people.

#### Halifax Town Centre

- Poor choice of shops for BME community;
- More local shops;
- Bigger stores needed;
- Market poor, should be more like Bradford market;
- Lack of leisure facilities (cinema/restaurants);
- Need low cost hotel accommodation;
- Piece Hall needs to be redeveloped for locals and tourists;
- Northgate House expensive to refurbish but keeps services central;
- Improve shopping centre - not extend;
- Out of town shopping cannot be used by elderly;
- Need a mixture of big and small companies and encourage small firms;
- Develop bull green area - key gateway.

#### Sowerby Bridge

- Needs a by-pass;



- Promote tourism;
- Possibility for a park and ride.

## Shopping

- Large supermarkets not a good idea;
- Need to preserve the 'high street'.

## Leisure

- Any new developments must have new facilities appropriate to the population;
- Loss of facilities major concern.

## Green Spaces

- Community gardening should be promoted (ala Incredible Edible);
- Need parks for elderly;
- Good parks and access to countryside (Halifax).

## Historic Environment/ Design

- Lots of historic buildings so why preserve everything - area looks like a museum;
- Protect historic buildings;
- New developments should be well designed - prefer traditional design;
- Regenerate deprived areas;
- Make a list of important buildings to protect;
- Design for new streets should include: pedestrians, cyclists, mobility scooter access ways and this should be incorporated into old streets;
- Secured by design – Yes please!

## Renewable Energy/ Climate Change

- Renewable energy - incorporate into every new building;
- Wind energy a good idea;
- Need better flood defences;
- Climate change should be the most important element of Core Strategy;
- Zero carbon housing by 2016;
- Reduce run-off - use more planting, SUDS etc.

## Transport

- Congestion major issue;
- Cutting rail services to Upper Valley;
- More different forms of transport - bus, trains, walking, cycling

## Minerals/ Waste

- Quarries generally a good thing in Southowram;
- Waste should be recycled.

## Ethnicity

- The Core Strategy should be doing more for Ethnic Minorities - need to plan for more multi-culturalism in the future.

## Key Actions 81

The comments from the Over 50s have many similarities with those from other groups and sessions however particular issues raised by this group for the Core Strategy to consider include the following;

- Provide a positive framework for improving facilities and services across Calderdale - linked to new development;
- Ensure the Core Strategy provides more affordable housing;
- Ensure the housing needs of the elderly are met;

- Facilitate job growth through new employment sites;
- Provide a policy to promote local shops;
- Promote the improvement of Halifax town centre and the Piece Hall;
- Promote traffic reduction and tourism in Sowerby Bridge;
- Provide a framework to re-use but protect our historic assets;
- Provide a strong policies to promote and require renewable energy and energy conservation;
- Ensure policies provide meaningful travel alternatives to the car;
- The Core Strategy should consider how it reacts to increased multi-culturalism.

### BME Network

**8.26** The Planning Aid discussion with the Black and Minority Ethnic (BME) community took place with 18 residents on 9th March 2011 at Hanson Lane Enterprise Centre. As with the other sessions Planning Aid introduced their role and this was then followed by group discussions relevant to attendee’s communities and associated policy issues of relevance to the BME community.

**8.27** The discussions concentrated upon Halifax town centre as well as housing, employment and transport issues. The full comments made at the event can be found on the Council website at [www.calderdale.gov.uk](http://www.calderdale.gov.uk).

### Core Strategy Key Themes 94

#### Housing

- Emphasis should be on affordable housing for young and old;
- BME population often like larger houses so family can stay together;

- Regeneration including demolition may be a good idea to provide the right kind of properties;
- Use brownfield sites first.

#### Economy/Jobs

- Small start-up units would be good;
- Transform Queens Road, Halifax into a cultural area;
- Too many small family businesses.

#### Halifax Town Centre

- Poor choice of shops, particularly non-food;
- Good idea to expand town centre;
- Parking is a problem;
- Walking routes to town all along busy roads;
- Piece Hall needs to be better used.

#### Transport

- Numerous issues with public transport, particularly buses which were considered too few, irregular and expensive.

#### Leisure/Recreation

- Need more for young people to do;
- Women need to be considered more in sports centres;
- Need a large venue, suitable for community functions.

#### Historic environment/Design

- Retain historic buildings;
- New buildings need to be well designed.

## Renewable Energy

- Generally considered should be promoted.

## Key Actions 82

The comments from the BME event show similarities with those from other groups. Particular actions to consider from this group include;

- Potential for selective demolition to provide better housing stock;
- Larger affordable homes to enable families to stay together;
- Provide land and buildings for small start-up enterprises; and
- New sports facilities should consider the needs of BME women.

## 9 Public Information Sessions and other meetings

**9.1** A number of public information sessions were held around the district during the consultation period; a total of 137 people attended events in Brighouse, Halifax, Hebden Bridge and Todmorden. These sessions were designed to give the general public information on the consultation documents and their purpose. They were also intended to provide an opportunity for open discussion around the content of the documents, the issues that the LDF should be addressing, and how to formally get involved with the consultation process.

### Brighouse

#### Introduction

**9.2** The Brighouse event was held at Brighouse High School 6th form centre. Out of the 4 public information sessions this event was the best attended, with 46 people present. The dominant topics of conversation related to housing and infrastructure issues.

#### Issues raised

**9.3** The main issues raised in relation to housing included:

- Concern around the amount of new housing proposed; and
- Multiple questions were raised around the determination of housing need, and the methodology used in determining targets (demographic figures used, population projections and migration etc.).

**9.4** In terms of infrastructure, the following points were raised:

- Infrastructure provision always lags behind development;
- In Brighouse the Council must look at full schools, full doctor's surgeries, full car parks and utilities overload before planning large amounts of housing;

- New development should provide new children's play areas and enhanced transport; and
- The Council should consider a North-South bypass around Brighouse utilising Clifton rail tracks.

**9.5** More general comments included:

- New housing must be supported by new jobs;
- The vision for Calderdale must be implemented as previous visions have not gone anywhere;
- Important to protect green field sites to prevent urban sprawl, including semi-rural and rural wildlife areas;
- In terms of the Core Strategy proposed areas, Hipperholme and Lightcliffe should not be included with Northowram and Shelf.

### Todmorden

#### Introduction

**9.6** The Todmorden event was held at Todmorden Town Hall, and 37 people were in attendance. The dominant topics raised at this event revolved around environmental issues and the green agenda, however there were also comments made in relation to the proposed vision.

#### Issues raised

**9.7** Comments relating to the proposed vision included:

- The vision should consider improving the efficiency of the older housing stock more;
- The vision should aim to increase energy efficiency in all or most existing homes and buildings not just many as stated in the vision;
- Reducing dependency on fossil fuels should be a core vision from which other measures follow, such as creating new ways of local food distribution;
- The vision needs to capture the headlines, for Todmorden this could be an integrated transport system and protecting Moorland;

- The vision should include reference to all of the district, not just the main towns;
- There is nothing in the vision to promote local products or growing local food, or promoting and encouraging local businesses to make products; and
- Include something around encouraging people to stay in the area.

## 9.8 More general comments included:

- Real fear of the green belt reducing, and particularly the 'Area Around Todmorden' due to its lower policy protection;
- The difficulty of protecting the moorlands from wind farm development needs to be resolved;
- The many streams should be utilised better for hydro power;
- Investigate the potential for a hydro power innovation centre in the town centre;
- Comments on the Todmorden and Hebden Bridge consultation leaflets lack distinct commitment and are vague;
- In Todmorden the outlying estates need development, not just the town centre;
- Gaps need to be maintained between communities to maintain sense of identity;
- The consultation document reads like an urban document - Todmorden could grow through the smaller areas, and include policies to protect services in outlying villages;
- If a significant amount of new housing is built then jobs will be needed for new residents; and
- It is important that the Core Strategy refers to the Council's Woodland Strategy.

## Halifax

### Introduction

**9.9** The Halifax public was held at The Square Chapel. Out of all the public information sessions this was the worst attended with only 21 people

in attendance. No dominant topics of conversation were raised at this event however many issues were discussed.

### Issues raised

#### 9.10 Comments relating to the proposed vision included:

- The vision is very aspirational but will be difficult to put into practice;
- It is nice to see the environmental aspects driving the vision - future generations are faced with massive changes and we have to use the natural assets in Calderdale; and
- The cultural aspect of the vision is important - we are seeing a gradual decline in cultural assets when we should be promoting this aspect.

#### 9.11 More general comments included:

- Climate change dominates the document to the exclusion of other matters;
- The document classes Stainland and Holywell Green as a local centre, the same as Hebden Bridge - the settlement hierarchy methodology should be reviewed as Stainland has fewer facilities now in existence;
- Concern of the impact of the plan on green belt;
- If jobs and houses are created the transport network needs improvement;
- The option to enhance the role of Todmorden will increase traffic significantly - improving linkage between Halifax and Todmorden would be the plan's biggest achievement;
- Must look at hydro power, in the past up to 70 mills were operational between Todmorden and Luddendenfoot;
- The topography in Calderdale is a serious barrier to sustainable modes of travel and reducing car use;
- To improve the town centre of Halifax car parking must be improved;
- Future social housing should be better quality than past ones;
- Policy on developing brownfield sites should be clear; and
- Infrastructure is seen as key alongside new development.



## Hebden Bridge Joint Town and Parish Councils

### Introduction

**9.12** The Hebden Bridge event was a public event organised as a joint meeting for the Hebden Bridge Partnership and local Parish Councils. 33 people attended with around half being members of the public.

### Issues raised

**9.13** The main issues that were raised at the meeting relating to the Core Strategy vision included:

- The vision has to support big changes in numbers in terms of population increases, CO2 reduction targets etc;
- The vision does not contain much about people - there should be mention of social cohesion within it; and
- Technology in its various forms should be a separate part of the list, stripped out from the general infrastructure point - it is key to enabling home working and improving the development and economy of the hilltop communities.

**9.14** More general comments included:

- The role of Hebden Bridge within the settlement hierarchy is downplayed, particularly in relation to Todmorden. However contrasting comments were received arguing that by potentially increasing development the local (housing) market would be weakened;
- Social and demographic care must be considered within the plan;
- Transport issues in the Hebden area need to be resolved, such as heavy traffic and lack of parking at the train station;
- Our influence and impact on climate change must be emphasised and addressed in the plan;
- The documents should consider decentralising council services away from Halifax to reduce travel;

- Has the impact of more development in Todmorden on Hebden Bridge been assessed properly, e.g. effect of supermarkets on traders;
- Todmorden is the ideal opportunity to increase employment in the valley and would benefit Hebden Bridge;
- Hebden Bridge needs jobs for ordinary people; and
- Todmorden and Hebden Bridge should be developed with tourism as the main focus.

### Ward Forums

**9.15** Ward forums were used to sign-post attendees to the consultation throughout February and March 2011. The comments raised at ward forum meetings can be viewed - [www.calderdale.gov.uk](http://www.calderdale.gov.uk).

### Calderdale Disability Forum

**9.16** The Calderdale Disability Forum were involved in the production of the Core Strategy Refined Issues and Options and during the consultation. Prior to publication of the consultation documents the forum recommended a number of design principles were included in the Core Strategy. These principles were included in the historic environment and design section of the 'Objectives and Policy Options' document and included lifetime homes and accessibility standards.

**9.17** A short presentation and discussion was also held with the forum during the consultation. The main comments from the discussions were it was important that strict design criteria for new buildings, streets and public spaces to improve accessibility for all should be included in the Core Strategy. It was also thought a Supplementary Planning Document on accessible design may be useful to guide developers.

## 10 Workshops

**10.1** Ten creative workshops were undertaken across Calderdale to investigate participants needs, aspirations and concerns for the future of their area in relation to planning. The events were very much the icing on the cake in terms of planning engagement, and provided a useful overview of general community views relating to development within each area.

**10.2** The workshops were limited to 20 people to ensure they could be adequately facilitated and enable a democratic discussion of all the hopes, fears and aspirations for the area that were raised during the workshops. The workshops took place in each of the 10 'areas' identified in the Core Strategy with the exception of the Protected Moorland areas, due to the lack of a resident population in this area. The 10th workshop focused upon the whole of Calderdale.

**10.3** The workshops invitees were recruited through a variety of methods including the Council's TalkBack Panel, the use of existing networks and those known to have an interest in the LDF. The key criteria were that those taking part lived within the area and the participants represented a wide range of circumstances including young people, unemployed, retired and business people. Whilst the majority of the workshops were fully subscribed many did not achieve a full attendance rate due to some people not being present on the evening. In addition the equality monitoring of the events needs to be viewed with a degree of caution as not everyone completed the equal opportunities monitoring form.

**10.4** The workshops were divided into four key areas of investigation:

- Resident's current life/work context and impact on quality of life;
- Aspirations for 20 years hence moving into their next life stage;
- What that imagined future would look and feel like to live in;
- Specific positive actions the LDF could take to realise these aspirations; and
- Group discussions to further explore themes and issues raised.

**10.5** The remainder of this section provides a brief discussion of each session. Full details of all the workshops can be viewed - [www.calderdale.gov.uk](http://www.calderdale.gov.uk).

### Elland/Greetland/Holywell Green/Stainland Workshop

**10.6** A total of 22 residents attended this workshop from a variety of life-stages including retired, young and employed. The participants were proud of where they lived and felt a strong sense of local identity and attachment to the area. They liked being connected to both Huddersfield and Halifax but wished to remain self-contained as an area. The countryside was seen as an important asset to the area either through passive appreciation or through outdoor activities.

**10.7** There was concern that each place within this area should be treated separately and not considered as a single homogeneous area. Residents had concerns over the possible threat of urban sprawl, increasing levels of traffic and the loss of local services.

**10.8** The residents themed their key aspirations for the area into 4 core headings centred upon the environment, community/facilities, employment/housing/policing/education and transport/traffic/roads. Those relating to planning are included below:

#### Core Strategy Key Themes 95

- **Environmental** - residents want to retain the character of their area by protection of green belt, no unsightly new builds and improved building maintenance;
- **Community and facility** - want to retain existing facilities and new facilities such as a doctor's surgery, shop and community centre. Residents want Elland to be a bustling local community and economy;

- **Housing and employment** - More affordable housing but less high rise flats. They want Elland to attract new businesses to boost employment for young and old;
- **Transport and traffic** - Residents in Stainland wanted improved bus services, whilst those in Elland a train station. The issues of congestion and heavy traffic were concerns for all.

Brighouse Workshop

**10.9** A total of 17 residents attended this workshop from a variety of life-stages including retired, young and employed.

**10.10** The workshop indicated residents are proud of where they live and want Brighouse thrive as a local economy and a place to live, work and play. They feel well located, well catered for in terms of local amenities (with the exception of healthcare) and well connected. Residents like the dual convenience of the facilities and benefits of a small local town and being connected by the M62 to larger towns and cities.

**10.11** The most significant perceived threat is over development and its impact on existing facilities, traffic congestion and the countryside. The Sugden Mill site, litter, traffic and lack of provision for young people were other concerns.

**10.12** The participants placed high value on the varied leisure opportunities, local amenities and convenient shopping in Brighouse. They also value their location which provides ease of access to the local countryside and to towns and cities elsewhere. There were clear concerns in relation to planning which residents believe materially impact on their quality of life; issues around over development, lack of provision for young people and litter, all feature strongly.

**10.13** The key aspirations of the participants, in descending order, were:

Core Strategy Key Themes 96

- **Environment** - want green areas to be preserved;
- **Health** - more NHS facilities and opportunities to get healthier;
- **Town Centre** - want the town centre regenerated with greater variety of shops and a feel of a country town;
- **Jobs/Employment** - more jobs and opportunities for local people;
- **Public Transport** - improved public transport to address parking and congestion issues;
- **Schools and Education** - Nursery provision, improvements to existing schools and more opportunities for adult education;
- **Roads and Traffic** - wanted solutions to congestion problems;
- **Housing** - wanted less housing development but more focus on renovating existing properties and housing which is affordable, good quality and well designed streets. They also wanted improved provision for the elderly;
- **Leisure** - more allotments and improved leisure for young and old;
- **Green Energy** - more renewable energy, but not necessarily wind farms.

Sowerby Bridge Workshop

**10.14** A total of 14 residents attended this workshop from a variety of life-stages including the young, employed and retired.

**10.15** The participants enjoy the area where they live and appear extremely frustrated at what they perceive as the untapped potential of Sowerby Bridge. They highly value the surrounding countryside viewing it as unique and precious contributing significantly to their quality of life. Sowerby Bridge delivers a poor quality 'small town experience' due to limited shopping opportunities, poor image, extremely high congestion and associated air and noise pollution.

**10.16** The town is viewed as having much more to offer both its residents and visitors including an improved day-time retail and leisure offer, making more of the town's heritage, providing additional way marked walks and improving the canal side leisure offer together with the provision of a Tourist Information Centre. The Wharf is perceived as a crucial element in improving the look, feel and functionality of the town.

**10.17** The key aspirations (related to planning) of the participants, in descending order of preference, were:

### Core Strategy Key Themes 97

- **Environment** - the neighbouring countryside and wildlife together with the identity of individual settlements be protected;
- **Transport** - solve congestion with relief road/by-pass, more attractive rail station and improved bus service;
- **Education** - better quality schools and local jobs for young people;
- **Leisure** - increased leisure opportunities and encouragement of tourism including provision of Tourist Information Centre;
- **Shops** - re-vitalisation of commercial centre;
- **Building** - buildings important to town's heritage to be protected, cleaned and renovated;
- **Cleanliness** - removal of litter from take-aways and cleaning of buildings, pavements and parks;
- **Pollution** - air free from (traffic) pollution;
- **Miscellaneous** - people aspire to live here and more employment opportunities beyond those in light industries e.g. in tourism.

### Northowram/Shelf/Hipperholme Workshop

**10.18** A total of 14 residents attended this workshop from a variety of life-stages including retired, young and employed. The workshop indicated

participants are proud of local community spirit. They feel well located, well catered for in terms of local amenities and well connected.

**10.19** Traffic speed and congestion is a key concern specifically around Stump Cross, Hipperholme crossroads and Northowram. They are also concerned about heavy loads and 'rat run' traffic through residential areas.

**10.20** The key findings from the workshop were that residents enjoy the surrounding countryside and to their proximity to other towns.

**10.21** When invited to vote on which they believed were the most important to their quality of life the results, in descending order, were:

### Core Strategy Key Themes 98

- **Open Spaces** - want the green belt to be preserved;
- **Local Identity** - want the villages to remain separate to preserve local identity, pride and community spirit;
- **Environment** - want fly tipping and dog fouling to be stopped, cleaner streets and air;
- **Local Facilities** - improved facilities for teenagers, more local shops and safer pedestrian crossings;
- **Power and Energy** - a move towards renewable energy and local power generation is important;
- **Transport** - want decreased congestion, safer roads and an improved public transport system;
- **Food Production** - there is a demand for local produce and an increase in provision of allotments;
- **Employment and Skills** - want an increase in locally available, high quality employment;
- **Development** - wanted less housing development whether that is new build estates or infill developments.

## Halifax Workshop

**10.22** A total of 11 residents attended this workshop from a variety of life-stages including retired, middle-aged and employed. The participants were proud of where they lived and regard it as a beautiful town with its buildings being a source of great pride and of great concern. They believe Halifax caters for a range of different needs both socially and culturally. Practically, the town houses a good market and adequate range of shops.

**10.23** The parks and open spaces are highly valued and participants would like the parks open for longer in the summer time. The surrounding countryside is also highly valued as a major contributor to well-being and quality of life. There are however a number of issues around anti-social behaviour at night-time, inadequate and expensive parking, and a limited choice of shops compared to neighbouring towns – all of which act as deterrents to visiting the town day and night.

**10.24** The residents themed their key aspirations for the area into 6 core headings. Those relating to planning are included below:

### Core Strategy Key Themes 99

#### Buildings

- Residents want no more modern ‘concrete’ developments;
- Preservation of Halifax’s historic buildings; and
- Support the sympathetic renovation of old buildings.

#### Community and Amenities

- Expansion of affordable sports and youth facilities;
- More free public toilets;
- Cleaner streets; and
- More seating areas.

#### Transport and Parking

- Improved bus service (including a free circular for shoppers);
- More cycle routes; and
- More blue badge parking spaces in town.

#### Shops and Businesses

- Reducing rents to encourage traders;
- Invest in Piece Hall; and
- Fewer betting and charity shops.

#### Young People

- Reduction in anti-social behaviour;
- Increased provision of facilities for the young; and
- The town should be more youth-friendly.

#### Miscellaneous

- Improved recycling service; and
- Increased sourcing of renewable energy.

## Todmorden Workshop

**10.25** A total of 19 residents took part in the workshop, including retired, young, and employed people. The participants were immensely proud of the town, with heritage, community spirit, and green ethos being important contributors to their quality of life. They regarded Todmorden as having a unique identity which generates a strong sense of belonging and attachment.

Aspirations concentrated on strengthening this identity, supporting local jobs and encouraging local trade, small businesses and tourism. Access to canals, countryside, local food and good social and leisure facilities





contribute to a sense of well being and active participation, whilst the architecture, heritage, and housing provide a distinctive look and feel to Todmorden, alongside the historic status as a border town has given rise to its unique character. Incredible Edible Todmorden (IET) has gained national and international recognition, and is one example of a desire to become increasingly self sufficient centred around sustainable living.

**10.26** One of the main concerns was the possibility of developing Todmorden into a principal town and all that comes with such a role; building on prized green sites, a lack of infrastructure to support an increased population, and a proliferation of supermarkets. Other concerns included inadequate building maintenance, limited conservation of landmark buildings and canals/ walkways, along with poor quality and inappropriate new build development. There is also the desire for a stronger self determination to achieve the aspirations they feel are not well understood by the Council.

**10.27** The key findings from the workshop were the high value placed on the surrounding countryside, local trade, good recreation and public facilities, a strong community spirit, and architectural heritage.

**10.28** Participants were invited to vote on which they were believed were the most important. In descending order these were:

### Core Strategy Key Themes 100

- **A Lovely Sustainable Town** - want sustainable energy generation, self sufficiency, further investment in IET, reduced carbon footprint and visible evidence of ethical living instigated through planning.
- **Local Democracy** - Greater independence from the Council, increased self governance, decision making at a more local level, and for the Council to pro actively engage with residents to understand their concerns, aspirations and values.

- **Good Cultural Stimulus, Environment and Leisure** - a more pleasing town environment, suggestions included pedestrianising the area from the Town Hall up to the Cinema Building, a green space in town (Bramsche Square), a marina development alongside Halifax Road, and pleasant places to sit. There was a need for a cultural and music venue, to develop the Town Hall into a cultural centre, recreation facilities for the elderly, an artists quarter, a venue for large scale events and more events like the Agricultural Show.
- **Lovely Community to Live In** - more and better community facilities, which offer a range of activities and opportunities for generations to integrate. They want to retain community pride through clean streets, refurbished derelict sites, green spaces and tree planting. They also want a community where people can grow old and live safely and sociably, in affordable housing, feeling fully integrated and involved.
- **Successful Local Businesses** - wish to see local trade encouraged and flourishing, with vacant shops filled and increased number and variety of local independent traders. Rents should be reviewed so they support business start ups and investment in the tourism industry.
- **Nationally Recognised / Tourism** - want Todmorden to become a national and international tourist destination. Its industrial, architectural, and leisure appeal along with a growing reputation as a 'green' town provides a different tourist offer nationally, which would appeal to a number of interest groups.
- **Transport Links** - improved rail provision, more trains, late night trains and better connections, address traffic by finding an alternative to the A646, adopting unadopted roads and introduction of a free bike scheme. They also want an improved bus service to reduce congestion and connect outlying areas.
- **Decent Housing** - want to see more affordable and accessible social housing, housing provision that is appropriate to local need and improved design standards and quality of new builds.

Hebden Bridge Workshop

**10.29** A total of 18 residents took part in the workshop including younger people, retired and those of working age. The participants valued Hebden Bridge as a friendly town with a strong sense of community. Services and facilities such as the Library, Picture House, schools, independent retailing and parks make it a good place to live. They did however think the town needs more affordable housing, they are also concerned about the high volume of traffic as well as a retail offer which is predominantly aimed at tourists.

**10.30** The residents voted on their 11 key aspirations in descending order those relating to planning were:

**Core Strategy Key Themes 101**

- **Services** - preserve what they have and value, but also want better health centres, allotments, pavements/paths, old peoples home, more for young people and better lighting;
- **Countryside** - preserve and maintain;
- **Transport and travel** - reduce amount of traffic and congestion, suggestions included a by-pass, traffic free centres for Hebden Bridge and Heptonstall and an improved rural bus service;
- **Shops** - want independent shops to thrive, no more supermarkets and more shops for residents and not tourists;
- **Housing** - Need to retain current population therefore emphasis should be on affordable housing, sheltered housing and good quality old people's homes.

Mytholmroyd/Luddendenfoot Workshop

**10.31** A total of 13 residents took part in this workshop including the young, employed and retired. Proximity to the surrounding countryside is

highly valued and contributes to quality of life, health and well-being. The small, compact nature of the town and villages help generate a feeling of community. There is a sense of belonging and the population regard this area as unique and in need of preservation.

**10.32** Concerns centre around the negative impacts of proposed new housing developments on greenfield sites and associated potential increases in traffic congestion, dilution of communities and loss of settlements' distinctive character.

**10.33** Other concerns include existing traffic congestion and the threat of a reduced train service at Mytholmroyd station, the decline of local trade and the lack of a village hub or community centre in Luddendenfoot.

**10.34** Participants do wish to retain the unique identity of the area but are not opposed to development on viable existing sites to meet local needs. They do not wish to see inappropriate development to meet national housing priorities.

**10.35** A growing local retail offer in the town and surrounding villages is seen as important as are improvements to the valued Mytholmroyd rail station.

**10.36** There is a feeling that this area has missed out on some of the funding from the Upper Valley Renaissance Initiative and is the poor relation to Hebden Bridge, despite its relatively high population.

**10.37** Participants voted on their key aspirations. In descending order of priority these were:

**Core Strategy Key Themes 102**

- **Care of environment** - preservation and caring of countryside as highly valued and adds significantly to quality of life;
- **Community trade** - increase number and diversity of independent shops plus a local market in St Michael's Square;

- **Transport** - importance of Mytholmroyd rail station highlighted including views service must not be reduced and need for improvements to station building and increased car parking;
- **Housing needs** - more care homes and suitable housing for the elderly as well as more affordable housing;
- **Education services** - good quality schools along with opportunities for training to increase employment prospects needed;
- **Facilities** - community space needed in Luddendenfoot and improved local sports facilities;
- **Policing** - greater police presence.

#### ***Additional Aspiration (Raised after the vote)***

- **Linkages** - closer alignment of Luddendenfoot with Mytholmroyd and Calder Valley bringing the two communities closer together and supporting sharing of amenities (as opposed to Luddendenfoot's current position in the Sowerby Bridge ward with links to the Ryburn Valley).

### **Ripponden/Rishworth/Barkisland Workshop**

**10.38** A total of 11 residents took part in the workshop, these were predominantly either retired or people in employment. Participants believe they enjoy a good quality of life which they attribute to the peace and tranquillity of their rural setting, the sense of community and good local facilities and communication links. The amount of traffic on the A58 combined with new housing, which they consider unsuited to local need, are considered as the biggest threats to their quality of life.

**10.39** They felt that if housing in the area continued to expand at its current rate they will not only will they lose their village identity, but the area will not be able to support the housing needs of its residents; from needing an affordable first home to being able to downsize in later years.

In addition, older participants were genuinely concerned that when they reach a stage in their lives and health where independent living is no longer possible, they will be forced to move away from their community because of the lack of residential and nursing care in the area.

**10.40** The participants voted on their key aspirations. In descending order of priority these were:

#### **Core Strategy Key Themes 103**

- **Hands off - qualified appropriate growth** - retain current feel, character and identity of each village. Retain green belt separation between them;
- **Better roads** - A58 heavily congested suggestions ranged from yellow lines to bypass for HGVs
- **Sense of place/ identity** - retain the sense of community, community building together with investment in local economy and environment in each place would help;
- **Increased facilities** - sheltered housing, retirement home or village, clubs and schools for young, more sports and recreation;
- **Youth of tomorrow** - not just facilities but education about the area;
- **Local food and self-sufficiency** - support local business through buying local produce in local shops;
- **Energy and sustainability** - develop more sustainable energy usage and improve recycling facilities;
- **Alternative travel** - use trains instead of HGVs, safe areas for bikes on A58 (or alternative routes), electric cars;
- **Rights of way** - clearly mark and maintain;
- **Housing** - more appropriate and affordable housing for local residents of all ages; and
- **Parking** - new parking in the area was also discussed.

## Calderdale Wide Workshop

**10.41** The Calderdale area workshop attracted 24 residents. These were mainly over 40 years of age, with just 4 people under 40. Participants derived much pleasure from living in Calderdale, valuing its unique environment and character, created by the people, landscape, history, heritage, rural atmosphere and abundant opportunities for local leisure, culture and recreation. They have a sense of well-being associated with their sense of belonging in "proper Yorkshire".



**10.42** Participants wanted the Council to take active custodianship of the area's character. In particular three key aspirations emerged from the workshop: preserving what people value; retaining the population at all stages of life and making improvements. In order for this to be achieved, a number of aspects need consideration:-

- Manufacturing base and enterprise - an alternative spirit could be championed to attract inward investment;
- Niche tourism;
- Scenic beauty and rural atmosphere which is under threat;
- Distinctive towns and villages under threat from ribbon development;
- "Totally Locally" ethos - supporting local community and local pride;
- Heritage, which is at risk of being diluted through unsympathetic development.

**10.43** Participants noted a number of "paradoxes" relating to life in Calderdale:-

- Tourist destination / new industrial area;
- Leisure / commerce;

- History / future;
- Space / development;
- Local need / national priorities.

**10.44** Specific action points proposed included a refocusing of priorities in relation to housing development and provision for/retention of the local population; the creation of a strategic integrated transport plan; increased investment in the preservation, management and access to the countryside and a more proactive stance to green energy. The process by which all this happens is considered as important to participants as the action points themselves. They want a process which is transparent, accountable, openly consultative and responsive to the findings of consultation.

**10.45** Participants themed their aspirations into 14 headings, which were prioritised in accordance with votes as follows:

### Core Strategy Key Themes 104

- **Green Space** - should be protected, and Rights of Way maintained;
- **Housing Development** - should be affordable to local people, of the right type and in the right place;
- **More jobs** - more and better employment available locally to reduce commuting, more apprenticeships;
- **Selling Calderdale** - proper investment in marketing and infrastructure could make Calderdale a thriving tourist destination;
- **Community services** - more and better local libraries; improved services and facilities for the old and young; continued support for the arts and a redeveloped Piece Hall;
- **Co-ordinated approach to private and goods transport** - reduce pressure on the roads;
- **Bus services\*** - improved connections to outlying villages;



- **Green Energy** - introduce hydro-power and more effective use of renewable energy through 'eco-homes', with careful consideration of the impact of wind-power on the landscape;
- **Vibrant Shops** - Calderdale should be a place where locally produced goods can be bought in local shops and markets. Town Centres should be supported through a "progressive rental regime";
- **Parking at Railway Stations\***
- **Community issues**
- **Recycling**
- **Rail Transport\*** - opening of Elland and Luddendenfoot stations;
- **Road transport\*** - reduced traffic and tackling congestion.

(\*if all these were headed under 'transport' it would have been the highest priority)

Halifax Railway Station



Footpath to Stoodley Pike



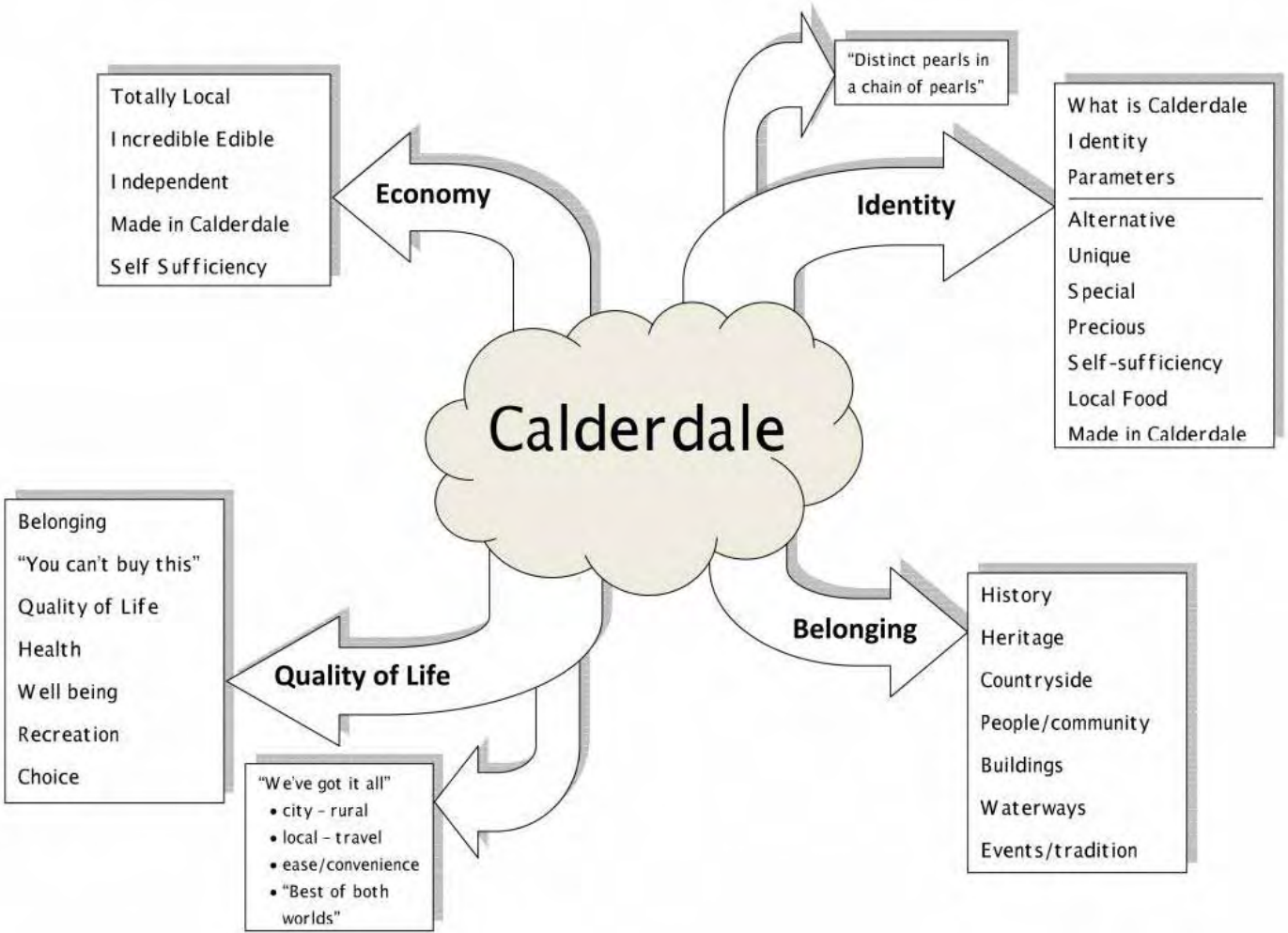


Workshop Summary

10

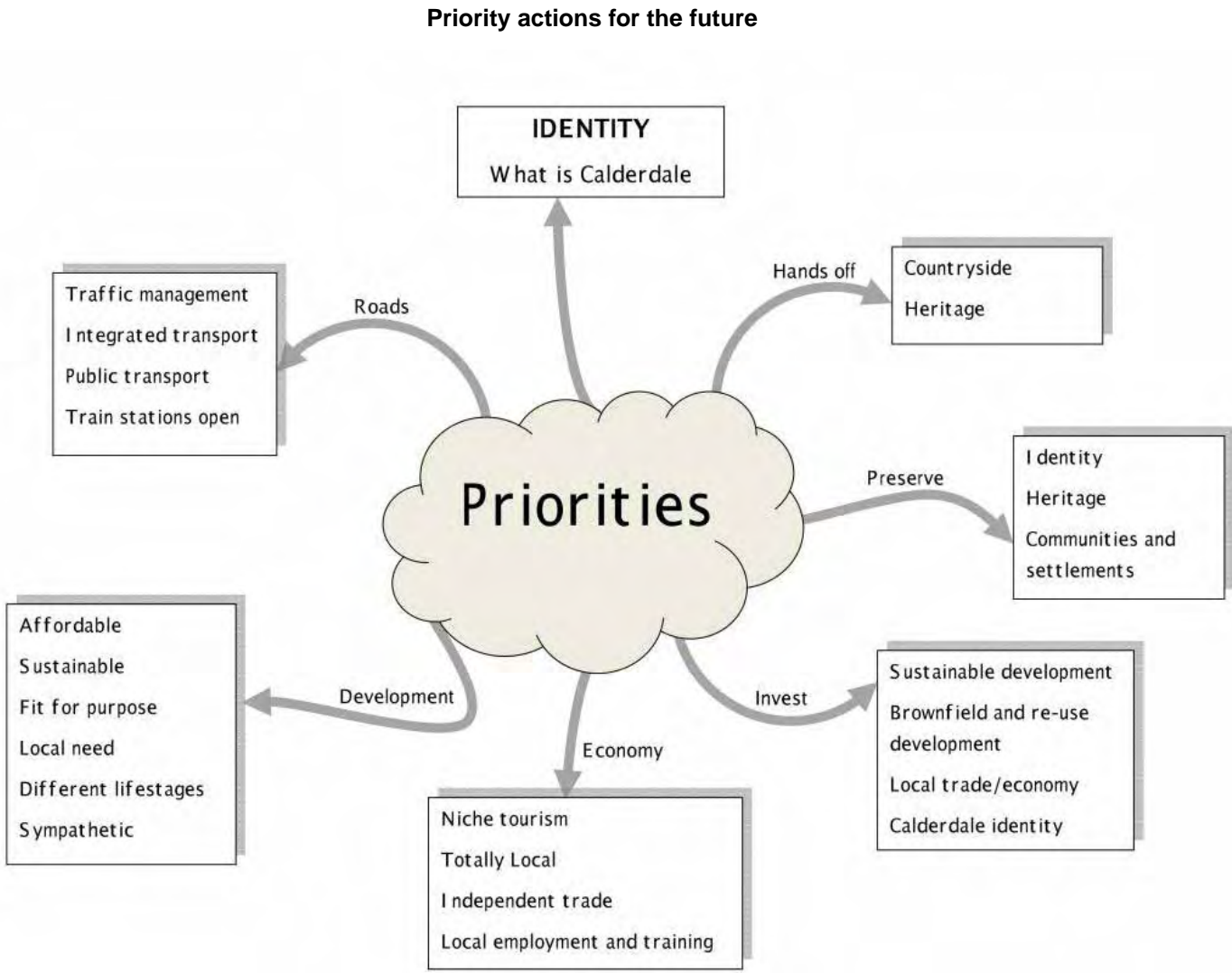
The following 'mind maps' summarise some of the main themes and issues which were raised during the workshops.

Calderdale - the place and the future



## Fears for the future





## 11 Lessons Learnt

**11.1** This final chapter considers the lessons which can be learnt from the methods used during the consultation and what could be improved for the next stage of consultation on the Core Strategy.

**11.2** It is clear that whilst the consultation elicited a lot of comments and received far greater breadth of groups than the previous consultation on the Core Strategy there is still a lot of work to be done to engage the wider community of Calderdale.

**11.3** The advertisement and awareness raising indicated in 2 'Awareness Raising' covered a wide breadth of mediums. All of the methods were useful but it appears more still needs to be done to increase public awareness of the consultation prior to the commencement of the next consultation. This may include greater use of social media sites, such as facebook or twitter. In addition attempts will be made to increase the amount of individuals signed-up to the consultation database and the use of existing groups and networks to spread information.

**11.4** The main method of engagement were the three consultation documents. These were well used by some respondents and provided a significant amount of detail for those who wanted to investigate the issues involved. They were, however, too lengthy and technical to engage the majority of residents within Calderdale. In combination with the documents a series of 10 area leaflets were created. These provided a limited information but were aimed at stimulating interest in the consultation. Whilst both the leaflets and consultation documents were useful, and will be used again, there is a need to consider other documentation during the next phase of consultation. A possibility may be a summary document could 'plug the gap' between the leaflets and the main documents by providing all the main messages but without the technical detail.

**11.5** Both the area based and Planning Aid workshops were particularly useful for this stage of the Core Strategy. They engaged a wide range of people from different backgrounds in in-depth discussions about their

areas and issues. This enabled a good understanding of participants concerns and aspirations to be gained. However the limited time and resources meant the number of attendees at each event was restricted. It is, therefore, important that the ideas and actions emerging from these events are consulted upon far more widely during the next phase of consultation.

**11.6** The four public meetings were relatively well attended and provided some useful information but the main use of these events was to sign-post attendees to the consultation. It is, however, considered that they have their place in the next phase of consultation as a means of passing on information.

**11.7** The involvement of children and young people through the schools consultations, workshops and the Calderdale Young Inspectors were particularly rewarding and provided a valuable extra element to the consultation responses. It is considered that this area of work should be built upon for future consultations.

**11.8** A common theme throughout the consultation was that the use of existing partners and networks to raise awareness and interest in the consultation was the most effective method of increasing participation rates, particularly at events.

**11.9** In conclusion whilst the awareness raising, documents and events were successful in gaining numerous comments from a wide variety of groups, organisations and individuals lessons can be learnt which will help improve the effectiveness of future consultations. This includes the continued and expanded use of existing partners and groups to assist in the engagement of a wide variety of communities and the need to continue to expand the range of methods used within the resources available to try and engage in as many ways as possible.