

Submission statement on behalf of Shelf and Northowram Local Plan Forum  
(SNLPF)

**Matter 7 – Housing need (update1)**

***Issue - Is the Council's proposed revised housing requirement of 14,950 dwellings between 2018 and 2033 (997 per year)2 justified and consistent with national policy?***

In addition to our comments below we have read and agree with the detailed analysis and comments for Matter 7 submitted by FOE and CPRE.

Our submission for matter 7 covers several of the questions posed by the Inspector.

Since the close of the Stage 1 hearings, the council have steadfastly refused to consider emerging evidence and policies that show:

1. A downward trend in the working age population (locally, regionally and nationally)
2. That the way forward for *economic* growth is not simply *employment* growth but consists of many factors e.g. increased productivity, innovation, investment in training etc.

This is despite many requests by various people at various times throughout the decision-making process, to embrace the choice set out in para 12 of the Inspector's letter of 16 July 2019. Following the 2019 Turley report (*Modelling the economic implications of the proposed housing requirement, August 2019*) the Council simply ignored any suggestion that economic growth could be driven by anything other than massive inward migration supported by the need for massive numbers of new houses, inevitably requiring a huge amount of land released from Green Belt.

We now have the latest 2018 ONS population projection which shows that Calderdale's population will only increase by **4,221** over the Local Plan period (from 2018 to 2033). This figure continues the downward trend shown in the last decade or so, in comparison the 2019 Turley report requires a population increase of **22,318** to meet the + Transport ambition. Clearly there is a massive gap between the approach put forward in the latest iteration of the LP and what is now accepted by all other responsible authorities, without any policy or strategy in the Local Plan to address how the shortfall in work force will be made up.

The council have failed to demonstrate why, in the face of National and Regional policies to the contrary, they continue to focus on levels of *employment* growth that are now impossible to achieve and cannot be used to support an unjustified and unsustainable housing requirement.

Clearly, the linked employment and housing growth are the foundations on which so much of the plan is built and without being able to demonstrate that they are justified, sustainable and *achievable*, the soundness of the whole plan must be questioned.

Additional comments regarding the 2019 Turley report

There is a further point which we feel needs to be discussed under this matter and that is regarding the content of the 2019 Turley report that was made available to commentators during the 2020 consultation on Additional Sites.

The Turley report: '*Modelling the economic implications of the proposed housing requirement*' dated August 2019 made several statements (see paras 2.11, 2.20, 4.7 of the report) that modelling assumptions in the report DID NOT take account of any benefits coming from the Council's Inclusive Economic (sic) Strategy and that separate judgements would have to be made [by the Council] as to the likely success of interventions in that Strategy. (our square brackets)

In February 2020, some 5+ weeks into the 6 week consultation we became aware that the Turley report linked to the Consultation documents and made available to the public had been heavily edited to remove any reference to the possibility of further work being carried out by the Council regarding their Inclusive Economy Strategy. The public were led to believe that the report was essentially a 'fait accompli' and that no further work could be done or was required.

This unauthorised editing was reported to the Programme Officer on 16 Feb 2020 and subsequently an unsatisfactory explanation was received from Spatial Planning. Following this unsatisfactory explanation, meetings took place between SNLPP, Ward Councillors and Calderdale Head of Legal Services. To date we have not had a final response from the Head of LS.

The result of this editing was that ordinary commentators were given incorrect and incomplete evidence behind the much higher housing figure being put forward by the council. We would welcome a full explanation as to why this happened so that the Inspector may wish to form a view on the soundness of the 2020 consultation.