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Our ref: General/40b – Planning Conformity/Final responses/Calderdale/Core Strategy Issues and Options Dec 08

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Philip Ratcliffe
Planning Policy Manager
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Dear Philip

Core Strategy DPD Issues and Options consultation

The Yorkshire and Humber Assembly (as the Regional Planning Body) welcomes the opportunity to comment on the Calderdale Core Strategy DPD Issues and Options consultation and to continue its involvement in the development of a coherent spatial planning framework for the region. The comments offered in this letter are intended to be within the spirit of continued and productive joint working.

At this stage, the Regional Planning Body's response to the consultation document is a set of officer comments. The aim is to highlight where issues related to general conformity with the Regional Spatial Strategy might arise. When the DPD is published prior to being submitted to the Secretary of State a formal Regional Planning Body view on its general conformity with the Regional Spatial Strategy will need to be requested (Regulation 29, 2008).

The following officer comments are made in relation to the current RSS – The Yorkshire and Humber Plan, which was issued by the Secretary of State in May 2008.

The Yorkshire and Humber Plan aims to achieve a more sustainable pattern and form of development, investment and activity across the region, putting a greater emphasis on matching needs across the region with opportunities and managing the environment as a key resource. There is a particular emphasis on achieving the regeneration and renaissance of the region's city and town centres by making them the focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities in the region.

Introduction

The way in which the document provides a clear introduction to the preparation of the Core Strategy and sets it within its national and regional policy context is welcomed.

As you know, the Planning and Compulsory Purchase Act 2004 introduced mechanisms to help ensure that Development Plan Documents (DPDs) drawn up by local authorities as part of the Local Development Framework (LDF) are in general conformity with the Regional Spatial Strategy (RSS). The intention is to ensure that DPDs are contributing to the delivery of the RSS and that the two strands of the Development Plan for an area (the RSS and DPDs) are mutually supportive and not in conflict.

It would therefore be helpful if the need for general conformity between the Core Strategy and the RSS were made clear from the outset.

LDF evidence base

We have already commented on the methodology for the Green Belt review (in June 2008), where we welcomed the overall approach and made some detailed comments. We have also supported the approach taken to identifying a settlement hierarchy (June 2008).

There are some parts of your evidence base, such as the Strategic Housing Land Availability Assessment and Strategic Flood Risk Assessment, that will clearly be vital to the preparation of the Core Strategy and we are pleased to see that many are due to be completed by early 2009.

Issues identified and Questions

Many of the issues covered and questions posed seek views regarding the relevance of RSS policy and the extent to which figures, targets and approaches set out in the RSS should be followed. Clearly the Core Strategy should seek to implement the spatial vision and headline outcomes of the RSS in order to be in general conformity with the Yorkshire and Humber Plan. The Core Strategy might do this by drawing on a local evidence base that shows how the RSS approach needs to be adapted to suit local circumstances.

The questions posed at present are very broad in nature and I'm sure you will receive a wide range of responses to them. As you develop the Core Strategy, the Regional Planning Body will be in a better position to comment on the extent to which the proposed approach will help to implement the RSS.

Spatial Options

As the document states, all of the options put forward would follow the overall Core Approach of the RSS. It is worth noting that the RSS sees housing and employment development contributing together to the development of an area and that it would not support housing growth alone that explicitly led to a reduction in employment opportunities or displacement of job opportunities to less sustainable locations.

We have already commented that Policy YH9 of RSS states that a strategic review of the West Yorkshire Green Belt may be required to deliver longer term housing growth and that the Leeds City Region Partnership has made a commitment in principle to delivering this.

I trust that you will find these comments helpful as you continue to develop your Core Strategy. If there are specific points that you would like to discuss at this stage, or if you feel that discussions would be helpful, please do not hesitate to get in touch. We look forward to continuing to work with you on your Core Strategy.

Regards

A handwritten signature in grey ink, appearing to read 'J Poxon', written in a cursive style.

Jenny Poxon
Head of Service
Planning Delivery and Conformity