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Our ref: General/40b – Planning Conformity/Final Response/Calderdale Mixed Use Dev Todmorden Jul 07

19 July 2007

Julie White
Planning Services
Calderdale Council
Northgate House
Northgate
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HX1 1UN

Dear Julie

Application reference: 07/01246/FUL

Mixed use development of 103 dwellings and 1437 square metre office development.

Thank you for consulting the Assembly on the above. I am pleased to forward the following officer comments to you, based on the current and draft RSS.

The Assembly, as the Regional Planning Body, has been asked to comment on this development as its nature and location mean that it could have an effect on the implementation of the Regional Spatial Strategy (RSS). The current RSS for Yorkshire and Humber (based on the Selective Review of RPG12) was issued by the Secretary of State in December 2004. The RSS has the status of a Development Plan Document and forms part of the framework for decisions taken under section 38 of the Planning and Compulsory Purchase Act (2004), which means that decisions on all applications have to be taken in accordance with the Development Plan unless other material considerations indicate otherwise.

The Planning and Compulsory Purchase Act (2004) and Circular 08/2005 make it clear that a draft RSS submitted to the Secretary of State is a relevant regional policy against which strategic applications can be considered. This Assembly response therefore also highlights relevant issues that arise from the Yorkshire and Humber Plan (draft RSS) December 2005 – the RSS submitted to the Secretary of State.

The Panel Report of the Examination in Public of the Yorkshire and Humber Plan has now been published (May 2007). This contains recommendations to

Government that may or may not be reflected in the Proposed Changes to the Plan that are due to be published for consultation in the summer. The Panel Report backs the Plan's overall approach and strategy. It also includes recommendations for changes or additions to policies. Any points from the Panel Report that are particularly relevant to the Assembly's comments on this application are noted in this response. The Yorkshire and Humber Plan should be published in early 2008.

Current and draft RSS support an urban focus for development and housing that meets local needs, including the need for affordable housing. Todmorden was identified as a Local Service Centre in the Regional Settlement Strategy that fed into the preparation of the draft RSS. Policy YH7 of draft RSS states that such centres should meet locally generated housing need. Policy YH8 of draft RSS states that limited development should take place in Local Service Centres to help meet local needs for affordable housing. Both current and draft RSS include policies on affordable housing. Policy H4 of existing RSS encourages local authorities to carry out Housing Needs Assessments, from which targets for the provision of affordable housing can be set. Policy H3A of the draft RSS suggests that in areas of 'low need' (including Todmorden) up to 29% of homes (on sites of 15 homes or more) needs to be affordable.

It should be noted that the Panel Report (May 2007) recommends changes to Policy H3 (see pages 81 – 85 and recommendations 5.10 and 5.11).

Current RSS (December 2004) sets an average annual net completion rate of 450 dwellings for Calderdale between 1998-2016. Draft RSS (December 2005) sets an average annual net completion rate of 500 dwellings for Calderdale between 2004 – 2011 and 2011 – 2016 and 670 dwellings between 2016 – 2021. The Panel Report (May 2007) makes the recommendation that the average net completions rate for Calderdale should be 500 dwellings per annum between 2004-2011 and 670 dwellings per annum between 2011-2016 and 2016-2021.

Based on information collected for the RSS Annual Monitoring Report and that set out in the recent Calderdale Supplementary Planning Document (Managing Housing Supply) demonstrates that housing provision in the Calderdale District is greatly exceeding housing targets set out in draft RSS (2005). However, this information also suggests that there is not sufficient affordable housing provision in the District to meet local need.

Given this context, the Assembly would be concerned if this development were to go ahead with no provision of affordable housing – as suggested in the application.

In the light of the above, we would strongly recommend that the local authority ensures a proportion of the dwellings are affordable, to meet locally identified need.

If you have any queries about this response, please do not hesitate to contact me.

Yours sincerely

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

Jenny Poxon
Head of Service Planning Delivery and Conformity