

Our Ref RAS

Your Ref

Please Contact: Richard Seaman

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Date: 29 July 2019

**Regeneration and Strategy**

Westgate House

Halifax

HX1 1PS

Miss Katie Child BSc (Hons) MA MRTPI, Planning Inspector  
C/o Miny Schofield, Programme Officer

Dear Inspector

**Calderdale Local Plan examination  
Council response to stage 1 post hearings letter**

1. Firstly, the Council would like to thank you for the manner in which the stage 1 hearings were conducted, and also for writing to us so quickly following the closure of the hearings.
2. Whilst we appreciate that your letter is without prejudice to your final conclusions on the Plan, we welcome the fact that you have only expressed significant concerns about one matter at this stage, namely housing need and requirement.
3. The Council is fully committed to adopting a sound Local Plan as soon as practicable, and we are therefore confident that we will be in a position to respond positively and constructively to your letter.
4. Our first action has been to commission Turley (who prepared our 2015 and 2018 SHMAs) to carry out further analysis and updated modelling. This work will establish the labour-force growth, and by association job growth, that could be expected to occur where the housing requirement of 840 homes per annum is delivered. Turley will also re-model the housing growth needed to support the Baseline and Policy-on job forecasts presented in the 2018 SHMA, reflecting the references made to both scenarios in your letter. I expect to receive the draft report from Turley on 26 August 2019.
5. The Council recognises that an increased housing requirement would necessitate additional sites being allocated. Planning officers have therefore started considering how potential changes to housing requirements could be potentially accommodated through allocations;



however, this exercise obviously cannot be completed until Turley have reported back at the end of August. We also intend to use this exercise as an opportunity to address the implications of any under-delivery of about 600 units on the Thornhills Garden Suburb (LP1463) during the life of the Plan. Additionally, we are mindful that there are question marks over the availability of a very small number of sites, and that some other sites are being brought forward at higher densities than previously assumed, so these matters will also be addressed.

6. We intend that the Council's Cabinet will consider a report covering the matters outlined in paragraphs 4 and 5 in September 2019. Given the expected date of the Turley report, I believe that 30 September is the most realistic date for Cabinet. Following the Cabinet decision, the Council expects that it would be necessary to undertake a 6 week consultation on any revised housing requirement and associated site allocations. Assuming that the consultation commences shortly after Cabinet and at least a week is allowed at the end of the period for analysing and summarising the responses received, this would bring us to the end of November. We would obviously also need to undertake further Sustainability Appraisal and Habitat Regulations Assessment during this period.
7. In the light of this the Council considers that it would not be practical to commence the hearings into the revised housing requirements and site allocations until January or February 2020. However, in the interests of making progress on other aspects of the Plan, the Council would like to enquire whether you would be agreeable to holding hearings to consider policies that are not dependent on housing need, requirement or supply in late November and/or early December 2019 (i.e. chapters 10, 12, aspects of 13, aspects of 14, 15, 17, 18, aspects of 19, 20, 21, 23 and 24)?
8. We have, as requested at the hearings, started the process of re-considering our 5-year housing supply in accordance with the NPPF (2019); however, it will obviously not be possible to complete this work in advance of the work identified at paragraphs 4 and 5 of this letter.
9. I have appended a chart to this letter that shows the timeline identified above.
10. As requested in your letter we are posting the working list of modifications to our website imminently and work is underway to address these matters.
11. I trust that I have addressed the matters raised in your letter; however, please do not hesitate to come back to me if you require any further information or clarification.

Yours sincerely

*Richard Seaman*

**Corporate Lead - Planning**