



Green Belt Review Methodology Consultation

Evidence Base - November 2008



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1 Introduction

1.1 The Planning and Compulsory Purchase Act 2004 introduced a new system of planning, making local planning authorities responsible for preparing and reviewing Local Development Frameworks. Calderdale has commenced preparation of its Local Development Framework (LDF), which will progressively supersede the Replacement Calderdale Unitary Development Plan (RCUDP) in accordance with the revised Town and Country Planning Act.

1.2 Calderdale is starting the LDF process with the preparation of a Core Strategy to determine where and in what form future development should take place in the Borough. This strategy must, however, conform to the Yorkshire and Humber Regional Spatial Strategy (RSS), which is part of the statutory Development Plan for the area.

1.3 A key task in deciding where and when new development should take place is to consider the impact of these new developments on the Green Belt, which is defined in National Planning Policy Guidance (Note) 2 (PPG2) (published in January 1995). It is important to take into account the Green Belt's historic and current context, and in particular how it performs with respect to the role and purposes defined by PPG2. Furthermore, it is wise to take into account the Green Belt's changing role over time and its geographical extent.

1.4 The purpose of this report is to set out the need, rationale and methodology for undertaking a Green Belt Review. It is important to consider the detailed extent of the Green Belt at this stage to inform the options for the LDF Core Strategy. The Green Belt Review once complete will provide an understanding of the current strengths and weaknesses of existing Green Belt designations and provide recommendations to change the Green Belt where appropriate to provide certainty for the next 30years or more.

1.5 This report has been produced following initial consultation on the scope of the Green Belt Review methodology. The details of this initial consultation are set out within Appendix 2.

2 Background

2.1 The boundaries of the Green Belt in Calderdale were prepared in the late 1950's by the former West Riding County Council and Halifax County Borough Council. The Green Belt extends around all the settlements within Calderdale, with the exception of Todmorden, due to the Western Limit of the West Yorkshire Green Belt being formed by the Pennine Way, which crosses the Upper Valley between Hebden Bridge and Todmorden. The area around Todmorden was not seen to fulfil the criteria for including land within the Green Belt. The only Green Belt, formally approved by the Secretary of State at this time, was Brighouse, approved in 1966. The rest of the Green Belt in Calderdale was approved on an interim basis. Within these areas, development was subject to the same controls as were applied to the formally approved Green Belt.

2.2 The West Yorkshire Structure Plan was approved by the Secretary of State in July 1980 and came into force in August 1980. This showed the general extent of Green Belt within West Yorkshire, and incorporated the original Green Belt areas from the earlier plans of the West Riding County Council and the Halifax County Borough. In order to provide detailed Green Belt boundaries the Calderdale Green Belt Subject Local Plan was prepared by the West Yorkshire Metropolitan County Council during 1984. A Public Local Inquiry into objections on the Local Plan was held in October 1985, and the inspector's report was presented to West Yorkshire Metropolitan County Council in March 1986. However, in view of the abolition of the Metropolitan County Council, the Secretary of State called in the local plan on 20 March 1986 to enable it to be further considered. In March 1989 the Secretary of State for the Environment, approved the Calderdale Green Belt Subject Local Plan, which provided detailed boundaries for the Green Belt Area.

2.3 During preparation of the Calderdale Unitary Development Plan, 1990/91, it was considered that a substantial review of Green Belt was inappropriate and unjustified, given that the boundaries had only recently been approved. The boundaries of the Green Belt Subject Local Plan were generally unchanged, and were incorporated within the UDP, with the exception of a few changes to accommodate economic activity. The sites that were removed from the Green Belt and allocated for employment land included land at; Ainleys, Elland; Wakefield Road, Clifton, Tenterfields Business Park, Luddendenfoot; and Bradford Road, Bailiff Bridge, Brighouse. However, it was anticipated that a Green Belt review may be required as part of the first review of the UDP, particularly if it was demonstrated that a shortage of housing and industry land could not be met within the urban areas.

2.4 The major changes to national policy that came forward since 1997 particularly with respect to the use of "brownfield land" and increasing the density of development, indicated that a major review of Green Belt was not necessary within the First Review of the UDP, the Replacement Calderdale UDP (RCUDP), adopted August 2006.

2.5 Regional Planning Guidance (RPG12) and the 2004, Regional Spatial Strategy (RSS) did not provide a need to undertake a strategic review of Green Belt boundaries within the region. However Policy P2 in RPG/RSS did give authorities the right to undertaken localised reviews of boundaries where these were justified by local circumstances. Whilst a major review was not considered necessary, within the RCUDP, economic considerations led the Council to propose four Employment Allocations on land previously in the Green Belt (Sites: EM47 Stainland Road, Elland; EM50 Halifax Road, Ripponden; EM51 Burnley Road, Tenterfields, Luddendenfoot and EM52 West of Holmfield Industrial Estate, Holmfield). A further change to the Green Belt also occurred during the RCUDP process. This recognised the difficulties and inconsistencies caused by the tightly drawn boundaries of the Green Belt around some parts of the urban area. The Green Belt in some locations followed irrational, arbitrary lines, or features on the Ordnance Survey Mapping, which bears no relationship to circumstances locally or features on the ground. Therefore it was considered appropriate to make minor alterations to the Green Belt boundary during the review process, in order to remove irregularities, reconcile different approaches in different parts of the district, and to take account of circumstances on the ground.

2.6 Calderdale produced the document 'Minor Changes to the Green Belt' which set out each Green Belt alteration within Calderdale, this was illustrated in a plan format and through a table. The Council followed a variety of principles to ensure the release of land from the Green Belt was necessary and did not materially harm the fundamental aim of the Green Belt Policy.

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2.7 The minor alterations to the Green Belt were carried out to recognise circumstances on the ground. It should be noted that they were not introduced to facilitate development or meet housing needs, but to provide a realistic and pragmatic approach to the boundary of the Green Belt throughout the district.



3 Policy Context

National

3.1 The starting point for any review of Green Belt is national Green Belt policy. Originally introduced in the 1930s in southeast England, the use of Green Belts to prevent unsuitable development in locations inconsistent with sound planning principles became national policy in the 1950s. At that time strategic planning authorities were instructed to define Green Belts to achieve specific Green Belt purposes around specified towns and cities in accordance with Government Circular 42/55.

3.2 The popularity and success of Green Belts has resulted in them remaining a fundamental part of national planning policy, and the recasting of national policy in Planning Policy Guidance Note (PPG) 2 in 1995, which still sets out national Green Belt policy.

3.3 PPG2 states that ‘the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the most important attribute of Green Belts is their openness. Green Belts can shape patterns of urban development at a sub-regional and regional scale, and help to ensure that development occurs in locations allocated in development plans. They help to protect the countryside, be it in agricultural, forestry or other use and can assist in moving towards more sustainable patterns of urban development.’

3.4 PPG2 identifies the 5 key purposes of Green Belts as the following:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns from merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and,
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

3.5 Once identified, PPG2 provides guidance on the intended objectives of Green Belts, stating that they have a positive role to play in fulfilling the following:

- to provide opportunities for access to the open countryside for the urban population;
- to provide opportunities for outdoor sport and outdoor recreation near urban areas;
- to retain attractive landscapes, and enhance landscapes, near to where people live;
- to improve damaged and derelict land around towns;
- to secure nature conservation interest; and,
- to retain land in agricultural, forestry and related uses.

3.6 Once the general extent of a Green Belt has been approved it should be altered only in exceptional circumstances. Similarly, detailed Green Belt boundaries defined in adopted local plans or earlier approved development plans should be altered only exceptionally. Detailed boundaries should not be altered or development allowed merely because the land has become derelict.

3.7 Wherever practicable a Green Belt should be several miles wide, so as to ensure an appreciable open zone all round the built-up area concerned. Boundaries should be clearly defined, using readily recognisable features such as roads, streams, and belts of trees or woodland edges where possible.

3.8 The role of regional and strategic planning guidance is to set the framework for Green Belt policy and settlement policy, including the direction of long-term development. Once the general extent of a Green Belt has been approved, it is then the role of local development plans to identify the detailed boundaries.

Regional

3.9 The previous RSS for the region was adopted in December 2004 and was based upon a partial review of Regional Planning Guidance. As noted in Section 2, it did not provide a need to undertake a strategic review

3 . Policy Context

of Green Belt boundaries within the region. However Policy P2 in RPG/RSS did give authorities the right to undertaken localised reviews of boundaries where these were justified by local circumstances.

3.10 A new RSS was adopted in May 2008, which replaces that dating from 2004. The new RSS through Policy YH9 indicates that the general extent of the Green Belt within the region should not be changed but does recognise that localised reviews of Green Belt boundaries may be necessary to deliver the Core Approach and that within West Yorkshire strategic reviews of the Green Belt may be required in order to deliver longer term housing growth.

3.11 The Core Approach within the emerging RSS, as interpreted for Calderdale, is to focus the majority of new development within Halifax and Brighouse.

Local

3.12 During the production of the RCUDP it was considered there was sufficient land proposed to meet future housing, employment and retailing needs, for the district until the end of the plan period (2016), without having to significantly encroach onto Green Belt. However a strategic review of Calderdale's Green Belt is now required due to the additional pressures for development noted within the emerging RSS and the tightly drawn nature of the Calderdale Green Belt. The RCUDP Inspector recommended a review of the Green Belt be undertaken as part of the LDF due to these issues. The inspector noted parts of the Green Belt have only tenuous links to the wider strategic area. Two notable examples provided were Illingworth and Lightcliffe where there are only nominal gaps linking a relatively small island of land to the wider expanse of the designated Green Belt.

4 Early Consultation

4.1 Early Consultation upon the Green Belt Review Methodology was undertaken from 9th June 08 until 11th July 08. The consultation was aimed at, but not restricted to, statutory consultees and groups or individuals that the Council considered could provide a technical input into the study methodology. A total of 9 consultees responded to the consultation providing 34 comments. Whilst the number of responses was limited the comments have been useful in refining the methodology and identifying the initial results contained in this report.

4.2 In general the respondents were supportive of the fact the Council were looking to undertake a review of its Green Belt and the methodology proposed. The majority of the comments received related to the criteria against which the Green Belt would be tested. There were several recommendations to change the scoring criteria which have generally been integrated into this report. A full schedule of all the comments received is included in Appendix 2 'Schedule of Comments'.

5 Methodology

Methodology for Area Definition

Introduction

5.1 The Green Belt Review will be conducted in three distinct stages. These stages are:

1. Initial sieving
2. Site identification
3. Site testing

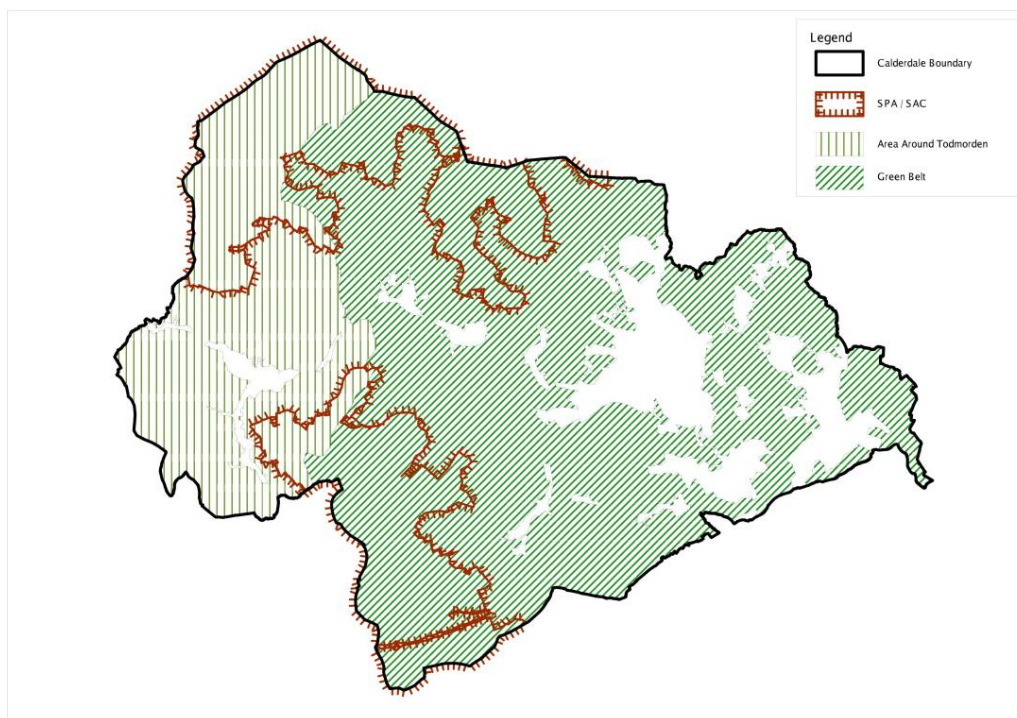
5.2 This report contains the results from stage 1 of this process.

Stage 1 - Initial sieving

5.3 The starting point for identifying the detailed study areas for this project was the whole of the existing Green Belt within Calderdale and the Area around Todmorden, currently covered by RCUDP policy NE7. The study area includes parts of the South Pennines Special Protection Area (SPA) and Special Area of Conservation (SAC), (Figure 5.1). Due to the size of the area it was important to reduce the study area and discount areas where change is unlikely, due to the Green Belts strategic importance or lack of development opportunities within the area.

5.4 The first stage of this sieving process was to remove sites which are protected by national or European law and policy. In terms of Calderdale this relates to the South Pennines SAC/ SPA located in the South and West of the district.

Figure 5.1 Green Belt Review Study Area

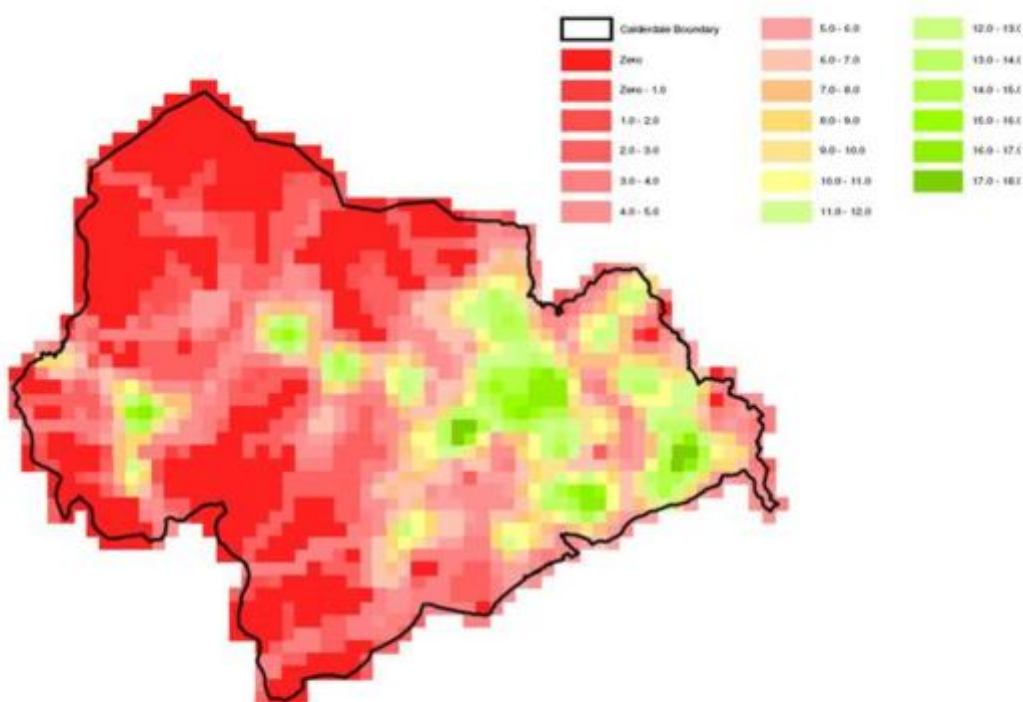


5.5 The second stage of the sieving process was to remove areas which through their location would contradict the principles of sustainable development as defined in PPS1. In addition PPG 2 (para 2.10) states when

drawing Green Belt boundaries in development plans local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development (for example in terms of the effects on car travel) of channelling development towards urban areas inside the inner Green Belt boundary, towards towns and villages inset within the Green Belt, or towards locations beyond the outer Green Belt boundary.

5.6 The results of the Councils Settlement Hierarchy model have been used to identify the sustainability of areas across Calderdale based upon access to services and facilities. The areas removed from the review at this stage were those which had a low sustainability score (less than 10.0) on the Settlement Hierarchy model, see figure 5.2. The Settlement Hierarchy model is based upon 500m grid squares covering the whole of Calderdale, each grid has a calculated sustainability score. The 500m grids have been used to broadly identify study areas for the Green Belt Review. However due to issues where the same grid can cover two distinct areas of Green Belt separated by the built-up area they could not be used to define the study area boundary.

Figure 5.2 Calderdale Settlement Hierarchy

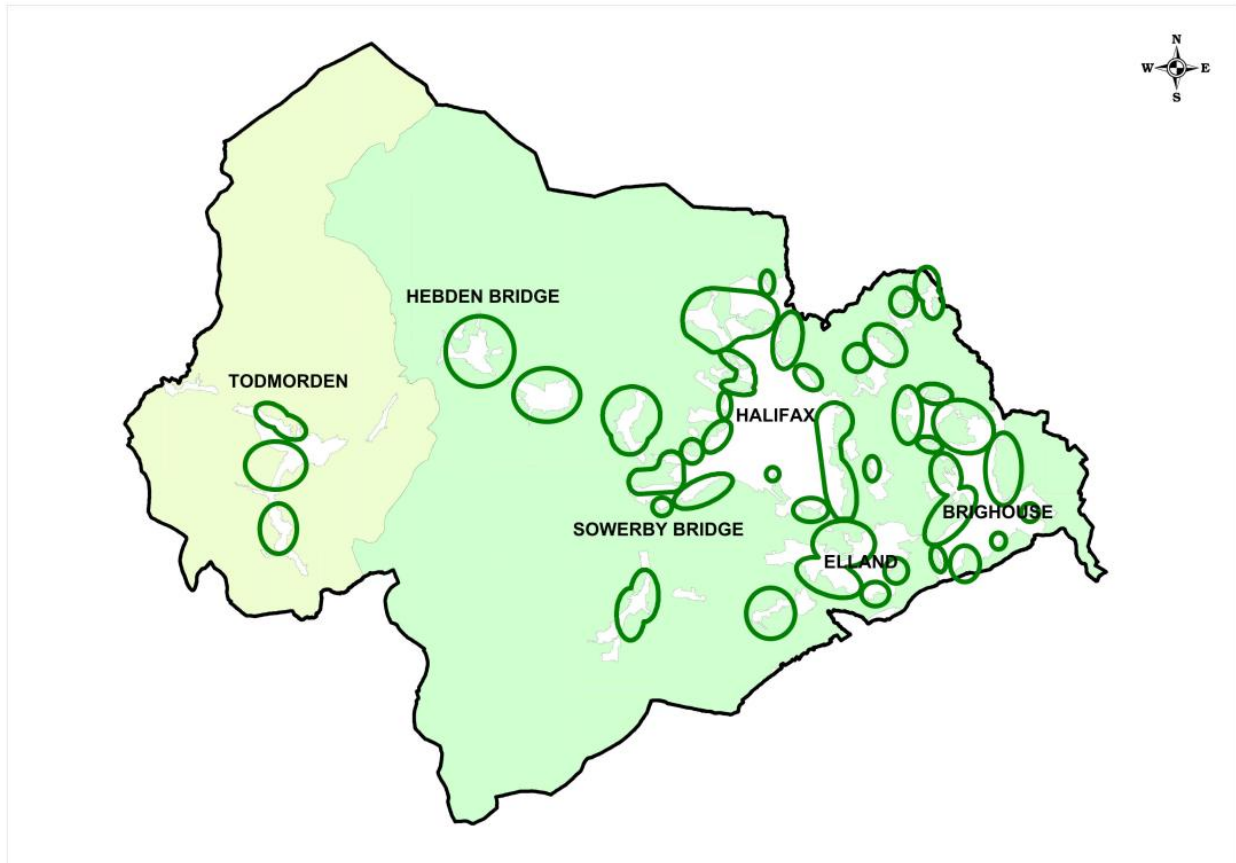


5.7 Therefore the final study area for the Green Belt Review were;

- Areas outside the 500m grid squares which and;
- Achieve a sustainability score of 10.0 or higher

This sieving analysis has provided broad areas of investigation for the next stage of the Green Belt Review process. The broad areas for investigation are indicated in figure 5.3.

Figure 5.3 Green Belt Areas for Potential Investigation



Stage 2 - Site identification

5.8 The next stage of the Green Belt Review is to identify, within the broad search areas, sites which will be subject to more rigorous testing against the criteria identified in stage 3. The area of land covered by UDP policy NE7, Area around Todmorden, has been treated as equivalent to Green Belt for the purpose of this study and the same criteria will apply to any release of policy NE7 in this area.

5.9 The sites will be identified using the following criteria;

- Sites should be of similar character and land use for Green Belt purposes;
- Whenever possible study areas should not cross significant boundaries such as motorways, rivers or protected woodlands;
- Study areas should take account of changing landscape and landform;
- Study areas should be smaller in area where they are located close to existing boundaries.

5.10 The RCUDP and aerial photographs will be used to establish the areas. Each study area will be assigned a unique identifier consisting of a letter and a number, which can be mapped using the Councils GIS system.

5.11 The boundaries of the sites will be given careful consideration to ensure they provide a robust and defensible boundary over time. The integrity of the Green Belt can be seriously compromised where Green Belt boundaries are constantly changing. Furthermore public confidence in Green Belt policies is very largely dependent on their certainty and longevity.

5.12 The assessment of the defensibility of present Green Belt boundaries is particularly important because weak boundaries can be vulnerable to urban encroachment. It is essential that existing and new boundaries are durable for the next 30 years. The site area boundaries will be examined during the study by undertaking a desk study and site visits to determine the extent to which it can be secured and maintained in the future by 'strong' defensible boundaries. This will be undertaken by the use of criteria relating to the strength of the boundaries over the long term taking account of physical events and planning decisions.

5.13 The first stage of the analysis will be to identify all possible physical and visual boundary types and applying a classification of 'strong' or 'weak'. This has already been undertaken by considering what types of boundary are likely to remain unaltered over the long term.

Table 1 Boundary Descriptions

Strong	Weak
Motorway	Disused railway lines
District Distributor Road	Private/ unmade roads
Railway line (in use)	Field boundaries
Rivers, streams, canal, other watercourses	Park boundaries
Prominent physical features (e.g. ridgeline)	Power lines
Protected woodlands/ hedges	Non protected woodlands/ trees/ hedges
Residential or other development with strong established boundaries.	Residential or other development with weak or intermediate boundaries

5.14 'Strong' boundaries are those anticipated to remain for the long term and are extremely difficult to alter or destroy by physical means or by planning decision. 'Weak' boundaries are those that are visible but can be easily altered or destroyed by physical means or by planning decision. In this context a boundary is defined as a recognisable linear feature or boundary between two separate areas of land. When identifying the site area boundaries strong boundaries will be used wherever possible.

Stage 3 - Site Testing

5.15 To provide a scoring system for the study areas each Green Belt purpose, as stated in Planning Policy Guidance 2, was analysed to establish a sound definition and then create a complementary scoring system so that each site in Calderdale's Green Belt Review can be evaluated consistently. The study investigated Planning Policy Guidance Note 2, all additional relevant Planning Policy Guidance/ Statements, and the adopted RSS. Professional experience and the results of consultation upon an early version of the Green Belt Review methodology have been used to apply this guidance and establish definitions, which are expressed as 'criteria' for the purposes of this report.

5.16 Once the criteria were defined it was necessary to establish a clear scoring system with points to allow an easy and transparent means of assessing the contribution each site makes to fulfilling each Green Belt purpose (as defined by PPG2). Therefore the criteria were further defined to describe the degree to which the area meets specific criteria and points will be awarded accordingly. The points range from 1 to 5, with 1 given to those areas providing a minimal contribution, and 5 to those areas fulfilling to a greatest extent the Green Belt purpose. The criteria and criteria definition are shown below, the associated points available are shown in Appendix 1.

Identification of 'large built-up area' and neighbouring 'towns'

5.17 The purposes of Green Belt, as identified in PPG2, identifies '**large built-up areas**' and '**towns**'.

5.18 To adequately undertake the Green Belt Review it was necessary to determine what, in terms of Calderdale, constitutes a large built-up area or town. PPG2 does not provide any guidance on this issue.

5.19 Calderdale is widely recognised to consist of 7 main towns, these are Halifax, Brighouse, Elland, Sowerby Bridge, Mytholmroyd, Hebden Bridge and Todmorden. This was used as the starting point for considering a large built up area. In addition to this information the adopted 2006 Replacement Calderdale Unitary Development Plan (UDP) identifies the extent of the current built-up area boundary within the district. This boundary clearly shows the continuous nature of development between some of the districts towns and smaller settlements, for example Halifax and Sowerby Bridge; and Brighouse and Hipperholme.

5.20 The district also has a number of smaller centres. Alone these could not be considered to constitute a 'large built-up area' due to their size and lack of services, however many are inter-connected and create continuous built-up areas. These clusters of smaller settlements are considered to constitute a large built-up area in terms of Calderdale. These clusters include Ripponden, Rishworth and Mill Bank; and Midgeley, Luddenden and Luddenden Foot.

5.21 Finally Calderdale has a number of small 'stand-alone' settlements completely surrounded by Green Belt. These include Old Town, Southowram, Bank Top, Barkisland and Crag Vale. Due to their size and relative isolation these settlements have not been defined as a large built-up area in terms of this study. For the purpose of consistency the definition of 'large built-up area' and 'town' is the same for this Green Belt Review, unless otherwise stated, and will be referred to as a large built-up area.

Purpose I. Check unrestricted sprawl of large built up areas:

5.22 The principal criteria for this purpose of restricting urban sprawl are – whether the area assists in halting ribbon development.

a. Impedes ribbon development:

5.23 Aerial photography will be studied to determine how much development is present along roads radiating from the large built-up areas within the study areas. One point will be allocated to those areas that have 10% or more of the land covered by buildings because these areas contribute least towards the openness of the Green Belt. Three points were given to those sub areas that have between 5 and 9% since the areas still needed assistance in restricting urban sprawl and five points for those with less than 5% land covered by buildings as these contribute most to the openness of the Green Belt.

Purpose II. Prevent neighbouring towns from merging:

5.24 The criterion used to assess how each sub area fulfils this 'purpose' is the role it plays in separating settlements in terms of the distance of its outer boundary from the nearest neighbouring urban area.

a. Distance from built up area:

5.25 A midpoint will be determined in each area and will be used to determine the distance from the area to the outer boundary of the closest built up area. A maximum distance of 2km has been chosen since this is considered a maximum practical distance of separation within the Review given Calderdale's pattern of development, particularly in the lower valley. Higher points will be scored for those sub areas closer to the built-up area boundary since these areas provide the most important contribution toward separation.

Purpose III. Assist in safeguarding the countryside from encroachment:

5.26 Defining this 'purpose' is difficult because the numerous roles the countryside performs in contributing to the Green Belt. The study defined four criteria based on the extent to which the nature and character of the

area of land contributes to the countryside. These criteria are nature conservation value, landscape character, the presence of trees/hedgerows, and agricultural land quality.

a. Nature and geological conservation value:

5.27 Sub areas that include areas with a nature conservation and or regionally important geological site (RIGS) designation, including UK Biodiversity Action Plan habitats, are recognised as providing significant biodiversity and geo-diversity value which require safeguarding from development and therefore received higher scores. The RCUDP, 'Magic' maps and the 'nature on the map website' will be used to determine if the area contains any land designated (either statutorily or non-statutorily) for nature or geological conservation interest.

b. Accessibility of communities to the countryside

5.28 The ability of the public to enjoy the countryside is another key feature of the Green Belt. Therefore the accessibility of areas to nearby communities is considered important. The main ways to enable countryside enjoyment is either through the presence of designated open areas, such as country parks or footpaths and bridleways allowing easy access. To assess the accessibility of the areas the presence of a public park and/or common together with footpaths and/ or bridleways scores 5 points, if either a public park/ common or footpath/ bridleway is present but not both it scores 3 points and if the neither are present it scores 1 point.

c. Trees/ woodland:

The RCUDP, 'Magic' maps and aerial photographs will be used to determine if the study areas contain any protected woodland, forest, trees or hedgerows. All areas that include ancient or other protected woodland, forests, trees, and/or hedgerows will be considered to provide additional benefit to Calderdale's countryside and score highest. Those containing significant tree cover and/or hedgerows which have no protection score 3 and those with none score 1.

d. Agriculture:

5.29 "Magic' maps and Agricultural Land Classification maps together with information from English Nature have been used to determine if land within the areas is used for agricultural purposes and the grading. Calderdale has no agricultural land which scores greater than Grade 3a; therefore its value for agricultural purposes is limited. However it is considered that scores should still be provided, but given the low quality of the land the highest achievable score is 4 for Grade 3a land, 3 for Grade 3b, 2 for Grade 4 and 1 for Grade 5.

Purpose IV. Preserve setting and special character of historic towns:

5.30 The criteria used for this purpose comprise visual links to Calderdale's Town Centres and the effect of the Green Belt upon each town's historic core and the relationship of the area to Conservation Areas and Historic Parks and Gardens.

a. Preserve the character and setting of the historic core of Calderdale towns:

5.31 For this purpose the seven main towns of Calderdale have been considered these are; Halifax, Brighouse, Elland, Sowerby Bridge, Myholmroyd, Hebden Bridge and Todmorden Town Centres. Each of the Town Centres which have a historic core, as identified by the presence of a conservation area was assessed for this purpose. This led to Green Belt areas surrounding Brighouse being excluded from this test, therefore all these areas only score 1. The views out of the conservation areas into the Green Belt will then assessed with regards to how important a role this plays in retaining the conservation areas character and setting. Where available, Conservation Area Character Appraisals will be used to assist the scoring process. Where the Green Belt study area is considered to have a significant impact upon the character and setting of the town it will score 5 thus allowing future generations the opportunity to experience the vista. Areas which provided limited impact will score 3 and those with little or no impact score 1.

b. Conservation Area/ Historic Park or Garden:

5.32 Green Belt Review sites that contain a Conservation Area or an Historic Park or Garden or are adjacent to them will be scored highly to reflect their importance. The RCUDP maps will be studied to determine whether or not a sub area contains or is adjacent to a Conservation Area/Historic Park or Garden.

Purpose V. Assist in urban regeneration, by encouraging the recycling of derelict and other urban land:

5.33 As every plot of land in a Green Belt contributes equally to fulfilling this 'purpose' by encouraging development within the urban area to an equal extent, all study areas would score the same against this purpose, so it has been excluded from the scoring process.

5.34 Some of the four purposes have more definable criteria, thus may have a higher total score than others. For example, purpose II, preventing neighbouring towns from merging, has only one criterion, therefore can only receive a maximum of 5 points; while purpose III, assisting in safeguarding the countryside from encroachment, has four criteria and the sub areas could receive a maximum of 20 points if it fulfils purpose II to the greatest extent. Left alone, this would imply that fulfilling purpose III was more important than fulfilling others.

5.35 To rectify this, a weighting system has been applied to ensure that each 'purpose' holds equal importance for the purposes of the initial scoring exercise. This is explained in Appendix 1.

6 Links with other LDF evidence

Introduction

6.1 The wider Green Belt within Calderdale should reflect the need for the Borough to accommodate new sustainable development now and in the future. The extent of the future Green Belt therefore needs to take account of the ability of the land within and adjoining it to accommodate new patterns of sustainable development to assist in delivering sustainable communities. Such new patterns of development will need to accommodate fundamental constraints, such as flood risk, and also consider if release or designation as Green Belt would provide opportunities to create more sustainable patterns of development.

6.2 These constraints and opportunities will, together with this study, assist the Council in deciding upon any future changes to the Green Belt.

Constraints

6.3 Constraints to future development need to be considered will be either 'hard constraints' – those constraints, which effectively preclude any development in the future – and 'soft constraints' – constraints which could provide justification not to develop the land but which are not insurmountable.

Table 2 Constraints

Hard Constraints	Soft Constraints
Flood risk	Sites of Special Scientific Interest
Special Protection Area/ Special Area of Conservation	Sites of Ecological or Geological Importance/ Regionally Important Geological Sites
Topography	Special Landscape Area
	Open Spaces for Sport and Recreation
	Historic/ Archaeological Designations
	Area around Todmorden (RCUDP policy NE7)
	RSS Core Approach

Opportunities

6.4 Government has given local planning authorities the responsibility for ensuring new development embodies the principles of sustainable development. Achieving sustainable development is about achieving a balance between the social, economic and environmental of a community.

6.5 A settlement hierarchy is currently being developed for the LDF, which will be one of the key pieces of evidence for achieving sustainable development. This Green Belt Review has been set-up to compliment the settlement hierarchy by using the same grids. A comparison between the results of this study and the settlement hierarchy should enable areas of opportunity and constraint to be identified.

6.6 In addition to this other studies, which will influence or be influenced by this Green Belt Review include:

- Strategic Housing Land Availability Assessment
- Employment Land Review
- Retail Needs Study

6 . Links with other LDF evidence

6.7 All the constraints and opportunities for the LDF together with the outcomes from this study will need to be considered together to provide spatial options for LDF Core Strategy. This may include the release and designation of Green Belt.

7 Conclusions

7.1 The Calderdale Green Belt Review is one of a number of studies, which will provide guidance for and inform the preparation of the Calderdale LDF. Whilst establishing the extent of the Green Belt and its future protection are important parts of the process, the LDF will need to address many other issues including the need to accommodate sustainable new development.

7.2 The national and regional planning policy context allow for strategic revisions of the Green Belt through the LDF process. There is commitment from the region to undertake a strategic Green Belt Review within West Yorkshire to assist housing delivery. However the need to review Calderdale's Green Belt is overdue as was highlighted within the Inspectors report into the RCUDP due to the incremental incursions into the Green Belt during the preparation of the UDP and RCUDP. In addition the Council has committed itself to undertaking a Green Belt Review as part of its Core Strategy to provide certainty over the next 30 years.

7.3 The Green Belt boundary is very tightly drawn around the districts towns and villages minimising the potential to accommodate the growth over the longer term. Therefore options for releasing Green Belt and designating Green Belt need to be considered to adequately address spatial options within the LDF Core Strategy.

7.4 The methodology proposes a three-stage process to investigate the validity of the current Green Belt and adjacent areas by investigating if it is fit for purpose and whether the current boundaries are adequate and defensible. Stage 1, identification of broad areas for investigation, is contained within this report.

7.5 The outcomes of this study will be used in conjunction with numerous other studies for the LDF to provide spatial options that can be tested with stakeholders, the public and other interested parties as well as assessed for their sustainability through Sustainability Appraisal.

Appendix 1 Criteria for Purpose Scoring

Table 3 Criteria for purpose scoring

Purpose	Criteria	Criteria Definition	Points	Weighting
1. Check unrestricted sprawl of large built up areas	Impedes ribbon development from large built-up areas	0-4% area covered by buildings	5	4
		5-9% area covered by buildings	3	
		=> 10% area covered by buildings	1	
2. Prevent neighbouring towns from merging	Distance from built up area	0-1km	5	4
		1-2 km	3	
		2km +	1	
3. Assist in safeguarding the countryside from encroachment	a. Nature or geological conservation value	Designated site (statutory)	5	1
		Designated site (Non-statutory)	3	
		No designations	1	
	b. Access to the countryside	Footpath/ Bridleway and Public Space present	5	1
		Footpath/ Bridleway or Public Space present	3	
		No public access	1	
	c. Trees/ woodland	Yes (existence of protected)	5	1
		Presence of non-protected trees, woodland/ hedges	3	
		None	1	
	d. Agriculture	Grade 3a	4	1
		Grade 3b	3	
		Grade 4	2	
Grade 5/No Agriculture1		1		
4. Preserve setting and special character of historic towns	a. Preserve the character and setting of the historic core of Calderdale towns	Significant impact	5	2
		Limited Impact	3	
		Little or No Impact	1	
	b. Conservation Area/ Historic Park or Garden	Within	5	2
		Adjacent	3	
		None	1	

Appendix 2 Schedule of Comments

Introduction

Consultation upon the Green Belt Review Methodology was undertaken from 9th June 08 until 11th July 08. The consultation was aimed at but not restricted to statutory consultees and groups or individuals that the Council considered could provide a technical input into the study methodology. A total of 9 consultees responded to the consultation providing 34 comments. Whilst the number of responses was limited the comments have been useful in the preparation of the methodology.

A summary of the comments and the Council response are indicated below.

Table 4 Comment Schedule

Response No.	Name	Section/Paragraph	Comments	Council Response
4	Colin Greenwood	General	<p>Although the consultation is targeted towards specific groups, I gather that other comments will be considered. I am a member of the Committee of the Protect the Colden Valley Campaign which has recently been concerned with a controversial development proposal. I submit the following comments on the criteria for purpose scoring and hope that they will be given consideration.</p> <p>There are many areas within Calderdale that offer breathtaking views of the countryside but which may or may not be sites of high quality landscape in themselves. To many, both residents and visitors, these rural views are more important than views of town centres. As well as marking up areas which are themselves special landscape areas, additional points should be awarded to those areas that offer extensive rural views or views of points of special interest that are not in the towns.</p> <p>"Historic Calderdale" is not limited to the town centres listed in the Consultation. There are rural areas that boast a very high density of listed buildings, with very few modern buildings to alter the historic landscape. It is suggested that the existence of listed buildings should be scored according to the density of such buildings with possible deductions where modern development may have detracted from the original character of the area.</p> <p>Parts of the upper Calder Valley retain traces of the earliest buildings of the</p>	<p>No change required. Whilst the points are noted the purpose of Green Belt is not to protect historic features – there are other mechanisms to ensure this occurs. PPG2 specifically relates to preserving ‘<i>the setting and character of historic towns</i>’. Therefore the methodology needs to be restricted to this purpose.</p>

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Response No.	Name	Section/Paragraph	Comments	Council Response
			industrial revolution, together with dams, watercourses, chimneys, connecting paved footpaths, roads and cottages. The preservation of these remains is at least as important as the preservation of town centres. The existence of such industrial archaeology in rural area usually pre-dates similar development in the towns. It is suggested that significantly higher marks should be given to areas which are identifiable as the earliest roots of the industrial revolution, even through the traces may now be limited.	
32	Paul Entwistle, North West Regional Assembly	General	The NWRA welcomes the approach taken by Calderdale to review the Green Belt. The Assembly supports the methodology which is closely tied to the nationally established purpose of the Green Belt. One of the criteria to be used is around the role of the Green Belt in preserving the setting and special character of historic towns, which includes areas of the Green Belt which protect views of historic parts of Calderdale. I have attached to the email a copy of the recording form that The Assembly developed for our Strategic Views research which was carried out a few years ago, this may help you develop a recording form: if you haven't already done so	Noted – Action required. The recording sheet will be used to help develop a recording sheet for the Green Belt Review.
33	John Pilgrim; Yorkshire Forward	General	We do not have any comments to make on the document.	Noted – no change required.
34	Alison Munday; Government Office Yorkshire and the Humber	General	We do not wish to make any comments.	Noted – no change required.
4	Martin Elliott; Yorkshire and Humber Assembly	General	We welcome the methodology for the green belt review. We consider that it is largely in line with The Yorkshire and Humber Plan (Regional Spatial Strategy up to 2026) which was published in May 2008 and we support Calderdale's recognition that an up to date Green Belt	Noted – no change required.

Response No.	Name	Section/Paragraph	Comments	Council Response
			<p>boundary may be required in order to accommodate the levels of housing growth included in association with RSS Policy H1.</p> <p>Current approved RSS Policy YH9 states that a strategic review of the West Yorkshire Green Belt may be required to deliver longer term housing growth. The Leeds City Region Partnership has made a commitment in principle to delivering this.</p>	
17	Geoff Hughes; Wadsworth Parish Council	Para 3.12	Narrow gaps and 'corridors' linking areas of Green Belt are very important for wildlife. These green corridors should not be looked upon as opportunities for development. Smaller 'green' areas linked to the larger expanses of Green Belt should be encouraged and expanded - not removed.	Agree - No changes recommended. Whilst it is agreed that narrow corridors linking areas of Green Belt are useful for wildlife, they do not necessarily fulfil the purpose of Green Belt and other open space designations can fulfil this need.
6	Martin Elliott; Yorkshire and Humber Assembly	Para 4.2	I note in paragraph 4.2 that the Council proposes adding land to the Green Belt within the SPA/SAC as a "compensatory addition". RSS Policy YH9 identifies that Green Belt Reviews should consider whether there are exceptional circumstances to include additional land. To that end I draw your attention to the court case Copas v The Royal Borough of Windsor and Maidenhead ([2001] J.P.L. 1169). This case provides that there will be no exceptional circumstance which necessitates an addition to the green belt unless "some fundamental assumption which caused the land initially to be excluded from the Green Belt is clearly and permanently falsified by a later event".	Noted – action required. The details of the court case will be considered and any proposals to increase the Green Belt passed onto the Councils own legal section.
20	Colin Holm; Natural England	Para 4.2	We note that the study will consider areas of the South Pennines SPA/SAC that may be suitable as a compensatory addition to	Noted - No changes recommended.

Response No.	Name	Section/Paragraph	Comments	Council Response
			<p>the green belt in the future. Whilst this may be a valid approach in terms of this study, we would advise that the significance of any potential effects of declaring additional green belt land within the SPA will need to be considered in the habitats regulations assessment (The Habitats Regulations, 1994 (as amended) require appropriate assessment of land use plans likely to have a significant effect on the conservation objectives of Natura 200 sites.) (also known as appropriate assessment) for the development plan documents in which any resulting green belt policy/revised boundary is conveyed. We will be happy to further discuss the need to screen development plans for appropriate assessment with you.</p> <p>There may also be opportunities to gather data relevant to a habitats regulations assessment at the same time as conducting the green belt review. For instance, depending on its habitat features, land outside the SPA may be part of the habitat requirement for certain bird species for which the SPA was designated. This may be a consideration if any change in green belt boundary is proposed. Again, we will be happy to discuss this further with Calderdale.</p>	<p>The alterations to the Green Belt will form part of the wider work upon the Calderdale LDF. The LDF as a whole will be subject to Appropriate Assessment.</p>
21	Colin Holm; Natural England	Para 4.3 & 4.4	<p>We welcome the approach taken whereby the greenbelt will be divided up into 500 metre grid squares, and grids will be combined to create study areas. In particular, we consider that study areas should take account of landscape character, identifying landscape character types and assessing current and anticipated changes impacting on the landscape. We believe that Local Development Frameworks (LDFs) should be informed by robust assessments of landscape character and this study should be similarly informed. This is important as landscape character areas may have different levels of sensitivity to development. We would be happy to advise further on landscape character assessment and how it can inform</p>	<p>Noted - No change required. Whilst the advantages of landscape character assessments are noted PPG2 specifically notes in para 1.7 <i>'although Green Belts often contain areas of attractive landscape, the quality of the landscape is not relevant to the</i></p>

Response No.	Name	Section/Paragraph	Comments	Council Response
			developing LDFs. Further details on landscape character assessment are also available from Natural England	<i>inclusion of land within a Green Belt or to its continued protection'. Therefore it is not considered that Landscape Character Assessments would aid this review.</i>
22	Colin Holm; Natural England	Para 4.7	We would agree that a scoring system assessing the contribution each area makes to different green belt purposes seems appropriate.	Noted – no change required.
9	Ian Smith; English Heritage	Para 4.8	Given that this aspect is to check the growth of "large" built up areas, is there a size limit on the settlements which would be examined under this Purpose? Paragraph 4.9 implies that roads radiating from villages will also be examined - a category of settlement which would appear to fall outside the provisions of the Purpose.	Agreed – Change required. The purpose in PPG2 relates to 'large built up areas' there is no definition provided within PPG2 however this would not include small villages or hamlets. The large built-up areas will be defined using a rationalisation of the existing 2006 UDP built-up area boundary of the larger towns and settlements within Calderdale.
23	Colin Holm; Natural England	Para 4.8 & 4.9	We agree that using aerial photography to determine whether areas assist in impeding urban sprawl is appropriate, however rather than simply determining how many houses along roads radiate from individual settlements, we would advise that a wider range of buildings (e.g.	Agreed – Change required. The criteria will be amended to include all building types.

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Response No.	Name	Section/Paragraph	Comments	Council Response
			buildings for employment uses) should be considered, as industrial / commercial sprawl can also spread out from settlements.	
10	Ian Smith; English Heritage	Para 4.10	Given that this aspect is to check the growth of neighbouring "towns" form merging, would this assessment exclude an examination of the distances between the Calderdale's towns and their surrounding villages? If gaps between large built-up areas and their neighbouring villages are to be excluded from examination under Purpose II, the Study ought to set out whether this would be a matter for consideration under Purpose I (on the basis that it could be construed as "urban sprawl") or Purpose III (insofar as it entails development encroaching into the countryside).	Agree in part - Change required. PPG2 does not define 'towns' however in respect of Calderdale this will be interpreted using the existing 2006 UDP built-up area boundary – continuous boundaries will constitute the same settlement.
24	Colin Holm; Natural England	Para 4.10	We agree that assessing distance from built up areas is a valid approach to assigning values to the important role that parts of the green belt play in preventing neighbouring towns from merging.	Noted – no change required.
11	Ian Smith; English Heritage	Para 4.12	The first two of the proposed Criteria relate to the quality of the landscape. However, as Paragraph 1.7 of PPG2 makes clear, "the quality of the landscape is not relevant to the inclusion on land within a Green Belt". If an area of land is outside a built-up area then, by implication it must be "countryside" and, therefore, it would fall within Purpose III - irrespective of whether it met either of the first two Criteria (or indeed last two Criteria) that are currently proposed.	Agree in part – Change required. It is recognised PPG2 para 1.7 is clear that landscape quality is not relevant. However the criterion for this purpose aims to identify the usefulness of the Green Belt area as a countryside resource. To better reflect this the criterion will be replaced by a criterion about

Response No.	Name	Section/Paragraph	Comments	Council Response
				access to the countryside.
25	Colin Holm; Natural England	Para 4.13	We would advise that a more robust assessment of nature conservation value would also include assessment of whether known UK BAP habitats are present (such data could be drawn from the nature on the map website – www.natureonthemap.org.uk). We would also advise that Calderdale’s local nature conservation site designations (e.g. SEGI) are not mapped on the Magic website. These should be identified and should contribute towards the scoring.	Agreed – Change required. The recommended data sources will be used to help score this criterion.
26	Colin Holm; Natural England	Para 4.14	While we welcome the inclusion of hedgerows identified in the RCUDP this may not contain all important hedgerows. It may be possible to determine whether an area has a good hedgerow network from aerial photographs.	Agreed – Change required. Aerial photographs will also be used to score this criterion.
27	Colin Holm; Natural England	Para 4.15	<p>We would agree that Agricultural Land Classification Maps should be used to determine the grading of land, however grading land at grade 3 at 3 points rather than 5 (given that grade 3 land is the best in Calderdale, and is also considered as being of good to moderate quality) may not give sufficient weighting to the important purpose of the green belt in providing space for agriculture, as well as the capacity of green belt land to contribute to local food production, an important aspect of sustainability. We would recommend making the scoring out of 5 rather than 3 to align with other criteria.</p> <p>Further to this point, it should be noted that Grade 3 Agricultural Land is subdivided into Grade 3 (A) and Grade 3 (B), the former falling within the definition of Best and Most Versatile Land. Magic data does not make this distinction as it is based on maps which preceded the subdivision (I have enclosed a leaflet explaining this more fully). Natural England’s Evidence Team may be able to supply maps based which include the subdivision, but coverage is not complete. The contact details on the leaflet are now slightly out</p>	<p>Agreed – Changes required. The scoring for the grading of agricultural land will be amended to reflect the importance of Grade3 Agricultural Land and the sub-division. In addition Margot Holmes will be contacted for more detailed information.</p> <p>An additional criterion will be put in place with regards accessibility of the countryside to the local area.</p>

Response No.	Name	Section/Paragraph	Comments	Council Response
			<p>of date, so I would advise that you send a map of the area of study when it is decided upon and request further information from Margot Holmes of the Evidence Team (margot.holmes@naturalengland.org.uk).</p> <p>We would also prefer to see an additional scoring criteria added, namely the public accessibility of green belt land. Natural England promotes an Accessible Natural Green Space Standard (ANGSt) (Natural England recommends that people in towns and cities should have:</p> <ul style="list-style-type: none"> -accessible natural green space less than 300m (in a straight line) from home -at least one accessible 20 ha site within 2km of home -one accessible 100 ha site within 5km of home -one accessible 500 ha site within 10 km of home <p>-statutory Local Nature Reserves provided at a minimum level of 1 ha per thousand population) and clearly green belt land can make a contribution to the availability of accessible natural green space to urban dwellers as well as the availability of other accessible open space types such as those described in PPG17. We would like to see a scoring system developed around how 'connected' areas are to nearby communities and whether they have public access (e.g. because of a good footpath, bridleway or because of the presence of public areas such as parks, commons or local nature reserves). An element of the scoring could also come from the contribution an area might make to increasing accessible green space to an area which currently has lower levels of accessibility to urban green space, thus placing a greater emphasis on meeting the ANGSt (or another locally defined) standard.</p>	

Response No.	Name	Section/Paragraph	Comments	Council Response
1	Richard Bell; West Yorkshire RIGS Group	Paras 4.12-4.15	It might be appropriate to make a mention of RIGS alongside 'Nature Conservation value' and 'Sites of high quality landscape character'. RIGS could be another strand in an argument to protect a landscape, some RIGS are there for the overall interest of the landscape - ice age landforms for example - but of course for other features like marine bands, faults or small scale folding - that we'd be perfectly happy if a rock face could be preserved in isolation and given better, safer public access in a supermarket car park or in a housing development, so RIGS doesn't imply that development should never happen. But in some green belt sites it would certainly add to the argument for preserving the whole landscape.	Agreed – Change required. RIGS will be included in Purpose iii criterion a.
12	Ian Smith; English Heritage	Para 4.16	We broadly support the Criterion proposed to assess to what extent an area of land preserves the character and setting of Calderdale's historic towns. However, whilst examining views of these settlements will enable the Council to make some assessment to what extent an area of land preserves the "setting" of the town, no examination is proposed to assess the extent it might preserve its "special character" to what a piece of land in the Green Belt may play in protecting it.	Agreed –changes required. Whilst historic views are considered important together with conservation areas it is recognised these do not necessarily identify the special character of the towns. Therefore conservation area appraisals will be studied and a criterion developed regarding how the Green Belt contributes to the towns character.
28	Colin Holm; Natural England	Para 4.16	We agree that assessing and scoring views of historic Calderdale is appropriate to the purpose of preserving the setting and special character of historic towns.	Noted – no change required.

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Response No.	Name	Section/Paragraph	Comments	Council Response
2 & 8	Colin Greenwood	Para 4.17	Under the heading "Views of Historic Calderdale", paragraph 4.17 proposes that areas that provide good views of the historic towns are to be marked higher than those that do not. Town-centre landmarks on which those views will be based are identified as town halls or specific churches. It is suggested that both in terms of a green belt, and in respect of Calderdale itself, this proposal is too limited and places undue emphasis on views of urban areas.	Agree in part – change required. The criterion is too limited and the special character of historic towns also needs consideration.
13	Ian Smith; English Heritage	Para 4.18	Conservation Areas and Historic Parks and Gardens are only relevant where they lie within or on the edge of a historic town, or where there is a relationship between that historic town and a nearby Historic Park and Garden or Conservation Area that contributes to its "special character" or the "setting" of the settlement	Agreed – no change required.
15	Geoff Hughes; Wadsworth Parish Council	Para 5.1	It is important current boundaries are not 'nibbled at'. Whilst changes may need to be made, these could obviously lead to an increase in size rather than a decrease! As paragraph 5.1 states, "public confidence in Green Belt policies is largely dependent on their certainty" and at the very least an overall 'status quo' as boundary changes would confirm this principle.	Noted – No change required. The purpose of the Green Belt Review is to provide certainty for the next 30 years without boundaries having to be 'tweaked' during that period.
29	Colin Holm; Natural England	Para 5.7	In the boundary review we agree that it will be important to assess the defensibility of boundaries to ensure a long term future for the green belt. We hope that the emerging green belt review will clearly state policy recommendations for strong and weak boundaries.	Noted – no change required.
16	Geoff Hughes; Wadsworth Parish Council	Para 5.8	'Natural Boundaries'- whilst revision of boundaries to strong and defensible boundaries sounds laudable, it is important that it does not become a developers charter. Once again this could just as easily mean an increase in Green Belt area as much as a decrease and a balance should be aimed for.	Noted – no change required. The purpose of the review is to ensure any boundary changes are based upon a

Response No.	Name	Section/Paragraph	Comments	Council Response
				robust assessment and will be subject to consultation through the LDF process.
31	Colin Holm; Natural England	Para 6.3	<p>We welcome the list of hard and soft constraints to future development in the green belt, though would advise that the list of soft constraints is very broad and this should be emphasised in the review. For instance, in the table soft constraints include Sites of Special Scientific Interest, which while not immune from development may in practice be more difficult to develop than certain other 'soft constraint' sites, in part because of a presumption against their development. For instance paragraph 8 of PPS9 states that "where a proposed development on land within or outside a SSSI is likely to have an adverse effect on a SSSI (either individually or in combination with other developments) planning permission will not normally be granted".</p> <p>An additional constraint would be the presence of a UK Biodiversity Action Plan Priority Habitat (Paragraph 16 of PPS9 states "Planning authorities should refuse permission where harm to the species or habitats [of principle importance for the conservation of biodiversity in England] would result unless the need for, and benefits of, the development clearly outweigh the harm"). As previously mentioned, their known locations can be obtained from the Nature on the Map website (see 4.13 above).</p>	Noted – no change required. Table 4 is not meant to provide a definitive list of all constraints rather provide guidance upon what may be considered 'hard' or 'soft'. Any constraint will be considered during the process of considering changes to the Green Belt.
14	Ian Smith; English Heritage	Table 4	It is not entirely clear the basis upon which a constraint has been identified as being "hard" or "soft". For example, in the case of archaeological sites, there is a clear presumption in PPG16 in favour of the physical preservation in situ of nationally-important archaeological sites and their settings. This would seem to preclude any development which might have an adverse impact upon such an area.	Noted - change required. The hard and soft constraints within Table 4 are for illustrative purposes only. The hard constraints are those where no development

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				should occur. The soft constraints are those where development opportunities will be limited but solutions may be found to overcome issues such as adverse impact.
30	Colin Holm; Natural England	Para 6.4	We would also highlight the need for the Green Belt Review, when it is produced, to set out opportunities to improve the quality and accessibility of the green belt. This may, for instance be achieved through a strategy for enhancement of the green belt based on the findings of the review	Agreed – no change required. The LDF Core Strategy will look at green infrastructure within the district and access to it. The Green Belt forms part of this infrastructure.
18	Geoff Hughes; Wadsworth Parish Council	Chapter 7	Paragraph 3.12 states there is sufficient land in the district to meet need up to 2016. Therefore any reduction in Green Belt would be hard to justify - some tweaking yes, but just as many gains as losses. Once defined after this review in order to maintain public confidence, boundaries should only be altered to reduce Green Belt in the most exceptional circumstances, for the foreseeable future.	Agree in part - No changes required. The Green Belt Review aims to look forward 30 years from adoption of the LDF Core Strategy (2041) and therefore likely pressures for development must be considered on such timescales. Once the new Green Belt is set it is anticipated no further changes will be required until 2041.
5	Martin Elliott; Yorkshire	Para 7.3	There are a number of detailed issues that we wish to raise at this stage so that they may be addressed prior to undertaking the	Noted - No changes required. The

Response No.	Name	Section/Paragraph	Comments	Council Response
	and Humber Assembly		Review of Green Belt. The most significant of these issues relates to the potential permanence of the revised Calderdale Green Belt using the methodology proposed. This concern arises from paragraph 7.3 of the report, which states that options for releasing Green Belt and designating Green Belt need to be considered to adequately address spatial options within the LDF Core Strategy.	Green Belt Review will take account of likely development pressures for the next 30 years. Once the review is complete it is anticipated no further changes will be required until 2041.
7	Martin Elliott; Yorkshire and Humber Assembly	Para 7.3	The RSS Update 2009 will identify broad locations in the Region where growth may be accommodated and where strategic change may be necessary to achieve this. The Options Stage due for consultation in October should help you inform a view of potential longer term growth needs i.e. up to and beyond 2030.	Noted – no change required. This will feed directly into options for the Green Belt.
19	Colin Holm; Natural England	Appendix 1	<p>The Green Belt is clearly an important part of Calderdale's green infrastructure and fulfils many functions. This methodology document correctly outlines the five key purposes of green belts cited in PPG2 along with their role in fulfilling objectives to provide opportunities for access to the open countryside and outdoor recreation, to retain attractive landscapes, to secure nature conservation interest and to retain land in agriculture and forestry. All these objectives are closely related to Natural England's interests.</p> <p>The methodology also correctly cites (in 3.10) RSS Policy YH9, which states that the general extent of green belt should not be changed, though strategic review of the green belt in West Yorkshire may be required.</p> <p>However Natural England would have liked to have seen a sub regional or Leeds City Region review of the Green Belt. Individual authority reviews will not take into account the green belt in adjoining areas, whether or not the green belt is continuous, nor the quality and character of adjoining green belt. Stopping at the authority's boundary is not the best way of assessing the green</p>	Agree in part - No changes required. The RSS has highlighted that the West Yorkshire Green Belt will be subject to review in the longer term. However there is a need to undertake a review of the Calderdale's Green Belt now due to the nature of the districts green Belt and development pressures, as indicated by the 2006 Inspectors report into the Replacement UDP. The district will work with adjoining

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Response No.	Name	Section/Paragraph	Comments	Council Response
			<p>belt in the sub region. We would advise that the LPA to work with other West Yorkshire Authorities to undertake a strategic review.</p> <p>While we would urge the local authority to work with neighbouring authorities for strategic review of the green belt we have also made a number of comments on the methodology presented.</p>	<p>authorities where it becomes evident alterations to the Calderdale Green Belt may impact upon that authority.</p>