

Introduction

CPRE is the countryside charity. We campaign to make the countryside a better place for everyone to live, work and enjoy. In West Yorkshire, the countryside is tightly woven between our towns and cities, and reaches deep into urban areas thanks to our Green Belts, green space corridors and amazing green and blue infrastructure.

CPRE is a passionate advocate for a strong, effective planning system that is easy for local people to access, influence and scrutinize. We are longstanding supporters of strategic spatial planning, and have argued for many years that key planning issues, such as the scale and distribution of housing, and planning for transport, energy and green infrastructure, should be undertaken in a far more joined-up way across local authority boundaries. In that context, we warmly welcome moves towards City Region-scale strategic planning, so long as the local accountability is strong.

Our Comments

Governance

There is precedent for having non-voting, non-elected members of an otherwise elected body, but it is essential this is done in a fair and transparent manner. The most obvious model to follow here is that of the Social, Economic and Environmental (SEE) Partners on the former Yorkshire & Humber Assembly. In the proposed deal, a key economic partner, the LEP Chair, is afforded such a role, but no equivalent is offered for social or environmental partners. This is a serious omission which should be rectified. Although the LEP Chair will not normally vote, the current proposals do not offer a balanced voice for other specialist perspectives. In terms of environment, it would be logical to appoint the chair of Yorkshire West Local Nature Partnership to this role. Social sector stakeholders will no doubt have a suggested representative, for example the West Yorkshire & Harrogate Health & Care Partnership.

Investment

Para 32 of the draft deal describes a Single Pot Assurance Framework, with sign-off by MHCLG, and a requirement for WYCA to demonstrate “an objective means with which to assess interventions and programme design so that these are aligned to their balanced economic outcomes for the area”. In the context of climate and biodiversity emergencies, and the public health inequalities that have been highlighted by the COVID pandemic, it is absolutely imperative that suitable objective measures for environmental and social outcomes, (eg greenhouse gas emissions) and not only economic outcomes.

Housing and Planning

We welcome the initiative for more joined-up, strategic spatial planning. The draft deal raises several crucial questions at this stage:

- What are the Combined Authority-wide arrangements for public consultation and scrutiny on the Spatial Development Strategy (SDS)?
- How does the process of making the SDS mesh with the cycles of the five constituent Local Plans? A statutory SDS must sit across and/or become part of the five Local Plans, or supercede those Plans in whole or part. What is envisaged?
- The list of suggested strategic policy topics are all important, but all appear to lack quantitative targets. This often puts environmental and social objectives at a disadvantage in monitoring and implementation, compared to housing and infrastructure developments that are more routinely quantified. How will the SDS operate in terms of monitoring impact and outcomes?

Climate, Flooding & the Environment

It is CPRE's position that all plans and strategies and investment programmes should commit to high level outcomes for responding to the climate and biodiversity emergencies, and making resilient places. We suggest these outcomes should be:

1. **net zero/negative carbon;**
2. **net gain for biodiversity;**
3. **net gain for walking and cycling as modal share;**
4. **net improvement to flood risk;**
5. **net gain for access to green/open space.**

We are delighted that the City Region has set a target to be a net zero carbon economy by 2038. However in our view, meaningful targets that set a clear direction and rate of progress against these five outcomes are needed as a matter of urgency, because otherwise they will be missed.

Conclusion

We hope that you will take our comments on board, principally by:

- **Providing greater, transparent representation for social and environmental stakeholders, alongside the economic stakeholder position proposed for the LEP Chair;**
- **Providing clarity about the accountability and scrutiny of the new planning powers, and how they mesh with existing strategic planning arrangements, to avoid risks of democratic deficit;**
- **Giving clear commitment to a direction and rate of monitorable progress on measures for climate response and resilient places, which are explicitly linked to the assessment of investment decisions.**

