

**Item 6 Development Committee
25th May 2022 – for information**

From: Colin Hill Project Manager

To : Development Committee

Draft Neighbourhood Plan Update

1. Background

- 1.1 The Neighbourhood Plan was started in 2015 with a series of consultation events held to ascertain key issues to consider from both a planning policy point of view and design guide. Integreate were engaged as our consultants.
- 1.2 Any final version must not contradict key planning policies of CMBC as the Local Planning Authority, but add to these to reflect local interest and aspirations.
- 1.3 This has to be approved by the Planning Inspectorate as it becomes a Supplementary Planning Document that then needs to be considered by CMBC when determining planning applications.
- 1.4 What emerged from these consultation events was a Draft Plan and Design Guide that then required additional pieces of work to be carried out in connection with local buildings of heritage interest, and protected green spaces, plus technical assessments including referencing with the CMBC Local Plan.
- 1.5 This work did not recommence in earnest until late 2019 when two main issues of timing needed to be considered: -
 - CMBC embarking on a new Local Development Plan
 - New Census for 2021
- 1.6 Both issues have a material impact on the validity of our Neighbourhood Plan in terms of alignment with CMBC Policies and also validation of data which may underpin some of our proposals.
- 1.7 Timing for submission of the Neighbourhood Plan is important. If for example submitted and approved by the Planning Inspectorate and then a new Local Plan approved, this may override what to us are key areas of influence and take precedent.

- 1.8 Given our knowledge of CMBC taking forward a new Local Plan and a 2021 Census, it was necessary to align when we would take forward the next steps to update data and referencing to the new Local Plan.
- 1.9 To better inform local housing need a Housing Needs Assessment was commissioned which will supplement our evidence base.
- 1.10 During this intervening period, Members wished to include a register of Local Heritage Buildings so that this an additional consideration for planners when dealing with buildings that we feel have significant local heritage characteristics but are not formally listed.
- 1.11 Such a register requires each entry to be accompanied by a statement supporting why it should be included. A process of categorisation was devised to determine which buildings/areas/groups were felt of sufficient importance to include, and in doing so, help influence such buildings and or character to remain and keep the “identity” of Todmorden.
- 1.12 In many cases individual properties not formally listed have similar characteristics and or may form part of what are felt to be historic groupings.
- 1.13 The extent of local knowledge of Members after applying selection criteria, reduced the list down to 177 properties/areas/ groups that have now required photographing and their history researching.
- 1.14 This has just been completed and now needs to be reformatted for Integrate to put into the plan which will now require plotting on supporting maps. What will be included in the final document will be guided by Integrate using their wider knowledge of what is likely to be acceptable to both the Local Planning Authority and or Inspectorate.
- 1.15 Members also took the opportunity to revisit the text of both the Draft Neighbourhood Plan and the Design Guide. Integrate have updated the plan but need to update the Design Guide.
- 2 Current Status**
- 2.1 CMBC have advised that depending upon the turnaround of documents following consultation this summer , they expect to adopt the Local Plan in October/November 2022.
- 2.2 Reference to the Govt website indicates Census Data will be published this summer.

- 2.3 As each of these significant issues fall into place, the Draft Neighbourhood Plan will be updated by Integreate to check and align our policies with those then detailed in the Local Plan and to update all of the datasets and charts currently referenced to the then 2011 Census.
- 2.4 The Draft Neighbourhood Plan also need to be updated to reflect the Town Deals Fund projects and to ensure do not contradict with what is being proposed. This work will be carried out by the Project Manager.
- 2.5 Whilst this is being progressed work will now be commenced by the Project Manager to identify Green Spaces for inclusion in the plan, to now specifically include Denis's Field given the recent Planning Inspectorate decision to not allow this site to be bought forward for Development on this.
- 2.5 Work is required to align now any green spaces also with sites now designated for development in the Local Plan. The project Manager will lead on this.

3. Green Spaces

- 3.1 Local Green Space is a designation contained in the National Planning Policy Framework (NPPF, July 2021, <https://www.gov.uk/government/publications/national-planning-policy-framework->
- 3.2 National planning policy for the designation and development management of Local Green Spaces is set out in paragraphs 101 to 103 of the NPPF: 101. The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them.
- 3.3 Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs, and other essential services.
- 3.4 Local Green Spaces should only be designated when a plan is prepared or updated and be capable of enduring beyond the end of the plan period.
- 3.5 The Local Green Space designation should only be used where the green space is:
 - a) in reasonably close proximity to the community it serves;

- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- c) local in character and is not an extensive tract of land.

3.6 Policies for managing development within a Local Green Space should be consistent with those for Green Belts.

4. Consultation

4.1 Given the long period that has lapsed since this was first compiled, it will be necessary to consult with the public again in order to understand whether any of the key priorities have changed and to reflect on any changes necessary.

4.1 This consultation will not be about wholesale changes, but about refinement with documents ready for viewing by the public to consider and comment on.

4.2 We are not expecting significant change unless the Local Development Plan Policies materially impact, priorities have substantially shifted and or underlying data informs a different direction.

5. Budget

5.1 Whilst there remains several up - front costs already met to take to submission stage, the updating of Policy referencing, review of Census Data and inclusion of a substantive Register of Buildings of Local Heritage Interest are all additional pieces of work.

5.2 The need to hold a further public consultation event(s) is also additional work.

5.3 Fee quotes have been obtained as follows: -

- Updating Plan £1,600
- Consultation event £1,400 including materials and updating plan
- Two subsequent events £1,600 (if required- localised ones were not well supported in the past).

5.4 There will be venue costs to meet as well as advertisement cost to be met as we progress consultation through paper-based surveys as well as digital format.

5.5 Members supported the creation of an Earmarked Reserve of £5,000 to meet costs to bring this piece of work to submission stage.

5.6 Consideration will be given to whether it will be possible to apply for a further grant from “Locality” to assist with the consultation costs.

6. Outline timing schedule

6.1 This is entirely dependent upon publication of the Local Development Plan and publishing of 2021 Census Data.

6.2 The target date for completion and submission to CMBC is July 2023.

Todmorden Neighbourhood Plan - Outline Timetable																			
Caveats to timetable - Local Plan completed and 2021 Census Data available																			
Task	By	2022										2023							
		May	June	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	
Review re Town Deals fund impact	CH	█																	
Include Local Heritage buildings of interest submit to Integreat	IG																		
Fee proposals re updating and consultation - to Resources	IG/CH																		
Compile Greenspaces register	CH		█	█															
Format Heritage work	NP		█	█	█														
Updated version from Integreat to include Heritage buildings	IG				█														
Submit draft to DC for comment prior to start updating	CH					█													
Submit Design Guide draft to DC for comment prior to updating	CH						█	█											
Update following Census Data Publication	IG							█	█	█									
Update following local plan publication to align policies	IG								█	█	█								
Bring to DC for sign off prior to public consultation - agree format and Member attendance	NC										█								
Public Consultation Reg 14 to commence	IG/TC											█	█	█					
Update by Itegreate Following Public Consultation	IG												█						
Bring to Dev Committee for sign off	NC													█	█	█			
Full Council sign off	NC															█	█		
Submit to CMBC	NC																█		
CMBC REG 16 consultation	CMBC																		to be
CMBC Submission and approval Sec of state	CMBC																		agreed