

Summary of basic conditions

1. Has regard to national policy and guidance from SoS
2. Contributes to sustainable development
3. General conformity with the strategic policy of the development plan for the area or any part of that area
4. Doesn't breach or is otherwise compatible with EU obligations – this includes the SEA Directive of 2001/42/EC

- What is the intended publication format of the Design Guide – a non-policy appendix to the NDP?
- What is the NDP's evidence base (one is alluded to on p11) other than the Housing Needs Assessment from 2020, census data, SHMA and community engagement by the forum?
- General note – check all your references to Local Plan policy numbers as some have changed, particularly SDx.
- Each mention of “providing the proposal complies with other relevant development plan policies” or similar is unnecessary as all relevant development plan policies will be considered when determining a planning application.
- 1.1.4 – Can change to just ‘Calderdale Local Plan (2023)’ as will be adopted by time of NP being made. Could also expand on the relationship between the two development plans, e.g.
 - *The Local Plan establishes the strategic policy framework for the Borough*
 - *The Local Plan includes development management policies to help determine planning applications, as well as setting requirements for the amount of housing, retail and employment land needed in the district to 2032, and allocates land for housing, employment and greenspace to meet the requirements*
 - *The neighbourhood plan seeks to build on the strategic policies set in the local plan by providing the locally specific applications for them; for example, defining the role of good design and what it means for Todmorden*
- 1.1.5 – Recommend removing ‘emerging’ and updating CLP dates to 2023-2032
- 1.3.5 – Dates missing
- 1.4 – Map has duplicate overlay text. Potentially makes Todmorden look separate from Calderdale.
- 3.1 – Neighbourhood profile could be updated to incorporate 2021 census data this year
- 3.2 – Neighbourhood plan survey responses; if you are doing any further public engagement this year, results of that could be inserted here to bring this up-to-date
- 4.1 – Can the **682** planned dwellings be updated? Combined indicative numbers of dwellings in the latest Local Plan come to **243**, down from **311**. Data for extant permissions and windfalls (which by definition aren't allocated) may need to be procured again. Could also be advisable to change “next 15 years” into a specific range.
- Policy H.2 Housing Mix – Should not be prescriptive in terms of percentages of house size when the LP (HS3) is not. See below options of suggested wording:
 - *Residential developments should provide a range of dwelling types to meet the needs of the area. Proposals including accommodation for older people and single people in line with the Housing Needs Assessment, will be supported.*
 - *Any housing development proposal of 10 or more dwellings, within or immediately adjacent to the built-up area of Todmorden, must provide an appropriate mix of dwelling types to include particular provision for smaller households.*

- *New housing development should provide a range of dwellings, suitable for longer term residents, in response to locally identified needs. The provision of two-bedroom homes will be supported.*
- Policy H.3 Housing Design – It would be worth mentioning, if not creating a policy for, development affecting the Todmorden and Lumbutts & Mankinholes conservation areas. Suggested wording:
 - *Development proposals within the Conservation Areas should also have regard to the character or appearance of the Conservation Areas and should demonstrate how the development will make a positive contribution to preserving the character of Todmorden.*
 - Or more specific, e.g. specific expectations regarding materials, building heights, boundary treatments, views and streetscapes within different character areas. Submitted Design Guide seems to take a very general view of the vernacular.
- Policy H.5 Reuse & Conversion – Acceptable as is, but you could consider incorporating something along the following lines:
 - *Provide sufficient vehicle parking to Local Authority standards within the development site wherever possible; new homes provided through conversion of existing mills and similar large buildings should incorporate basement parking wherever feasible;*
- Policy H.7 Inclusive & Accessible Homes – Typo built>build
- Policy H.8 Sustainable Drainage Systems – Consider also a provision to support to any application to retrofit SuDs / NFM to any previously permitted development; and indicate that a full range of options for developers can be found at the [Slow the Flow: Calderdale](#) website.
- Policy ED.3 Home Working – Not sure that this will be very applicable to a planning context. What kind of conversion or permission would be needed to work from home?
- Policy ED.4 Visitor Accommodation – Could be accompanied by more evidence to suggest that there is a lack (or perceived lack) of visitor accommodation and its effect on tourist appeal. Possibly the policy is too specific as is. Potentially something closer to the following form would work:
 - *Sustainable tourism enhancement:
Proposals designed to enhance the tourism offer of the town, including visitor accommodation will be encouraged where these:*
 - a) Are in keeping with its surroundings in terms of scale and design.*
 - b) Demonstrate that the proposals will serve to broaden the town's appeal to tourists.*
 - c) Provide a travel plan that considers the needs of staff, guests and other visitors and seeks to keep travel disruption to a minimum.*
- Policy ED.5 Retail – Too imprecise. What is 'small scale' retail – maybe indicate a maximum floorspace that would be included in this policy. If we take 'town centre' to mean the town centre boundary in the Local Plan, where exactly does 'around' it apply to? Probably some reference to evidence regarding unit vacancy levels or extra demand for space from businesses would help justify this policy. Perhaps ED.5 could be reversed into a policy stating that
 - *Proposals which would result in the loss of existing retail facilities in the town centre will not be supported, unless:*
 - a) They incorporate premises for other acceptable town centre uses consistent with Local Plan policies; or*
 - b) They include proposals for alternative retail in the town centre; or*
 - c) There is no reasonable prospect of viable continued use of the existing building or facility in its current or previous use and it has been demonstrated that the premises have been marketed for retail use for at least 6 months*
- Policy ED.6 Tourism & Leisure – combine with ED.4
- Policy ED.8 High Speed Broadband – What does 'designed to connect' mean and how does this policy tie up with LP policy IM6?

- Policy NE.3 Hillside Development – How would we distinguish development on hillsides that would increase the water run-off vs that which wouldn't?
- P56 – are you awaiting that map from Calderdale or your consultants?
- P60 – Town centre boundary map needs redrawing as it has changed in the latest LP
- Policy TC.4 Car Parking – Questioning the workability of this policy in practice. Station already has 55-space car park and no obvious sites for this to be extended, so what would the policy be used for? I would suggest the principle is already covered by LP policy IM4 (II)(h): *Improved access and facilities for rail users including enhanced public transport interchange and parking provision at stations*. Also, if the policy remains, the railway station should be named since Todmorden and Walsden stations are both within the parish.
- Policy TC.5 Dementia Friendly Design – There is provision in planning rules for dementia-friendly design so not something you could judge a planning application on. Would be best left as a recommendation within the design handbook.
- Policy TM.1 Walking Networks – May as well include cycling in the policy title as it is treated on a par with walking.
- In the transport section you could also consider a policy on electric vehicle charging infrastructure in new development
- P71 – There are currently **334** listed buildings or structures within the plan area
- P72 – List of non-designated heritage assets is missing. They should also be plotted on a map (we can help with this).
- P74-5 – The list of key views and the images and diagram and numbers don't seem to have any relation
- Policy CCR.1, CCR.2 & CCR.3 could be combined into one
- The NDP should include a delivery plan for all projects and visions mentioned, including whether short/medium/long term, potential partner organisations, and potential funding. This could be in a tabular format.
- The NDP also needs appendices showing the policies map, and detailing local green spaces with assessments (including individual maps), designated heritage assets e.g. listed buildings (including map), and identified non-designated heritage assets (including map as mentioned above). Other optional figures (because they have policies relating to them) could show Special Landscape Areas, Character Areas, Conservation Areas, and the cycleway, footpath and bridleway network. CMBC is happy to help with the production of all these.