

TODMORDEN TOWN COUNCIL

Todmorden Neighbourhood Plan Statement of Consultation

November 2023

Submission Version 2023-2032

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1.0 Introduction

The Todmorden Neighbourhood Plan (TNP) has been produced by Todmorden Town Council (TTC), but has been led by a Neighbourhood Plan Project Group comprising of both residents and councillors from across the Plan area. The TNP has been produced using the views and opinions expressed by all the stakeholders in the area, such as; local residents, local business owners and local landowners. The aim of the TNP is to positively plan for the future development of the area to create a sustainable place for people to live, work and visit.

The purpose of this document is to demonstrate how the TNP is the result of community and stakeholder engagement and consultation, and how its vision, aims, objectives, and policies are a genuine response to local issues and aspirations. The results of engagement and consultation have informed and shaped the Plan, and its policies, ensuring that they promote sustainable development and reflect local needs.

Included in this summary is an overview and description of the numerous engagement and consultation exercises that have been undertaken in the TNP process.

This consultation statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2018 Section 15(2) Part 5 of the Regulations sets out what a Consultation Statement should contain:

- details of people and organisations consulted about the proposed neighbourhood plan;
- details of how they were consulted;
- a summary of the main issues and concerns raised through the consultation process;
- descriptions of how these issues and concerns were considered and addressed in the proposed neighbourhood plan

1.1 Aims of Consultation

To ensure the local community feel a sense of ownership over the TNP the project group scheduled a series of exercises aimed at promoting, informing, engaging and consulting with local people.

Key principles of engagement and consultation:

- Front loading

A great deal of engagement was undertaken early on in the process before any contents of the Plan were decided. This was to ensure that the scope and content of the plan has been influenced by local people and can be evidenced as being a response to the results of engagement and consultation.

- Continual consultation

Ensuring that consultation and feedback has been undertaken throughout the process of producing the TNP at key defined stages.

- Inclusion

An aim of the TNP has been to consult with a wide range of members of the community.

- Ensure transparency

The TNP project group have been keen to ensure that the NDP process is open, inclusive and transparent. This involves making sure all documents relating to the Plan and its engagement and consultation are available to members of the community and key stakeholders.

1.2 Methodology

Throughout the process of producing the TNP different methods of engagement and consultation have been undertaken to achieve different outcomes. The different exercises can broadly fit into three categories: **Informing**, **Engaging**, and **Consulting**.

Informing exercises aimed to promote the NDP and raise awareness of the project in the community. This exercise was undertaken through the use of:

Online news items on the TTC website, project group meetings, feedback reports, posters and flyers.

Engagement exercises were aimed at developing a critical understanding of local issues and aspirations so that the TNP could focus on the issues raised. This was done through:

Public surveys both online and in paper form; Community drop-in sessions, community workshops.

Consultation exercises were undertaken once the TNP has been sufficiently developed so that proposals could be shown to stakeholders to gauge their support and to identify any concerns or areas of uncertainty. This has been done through:

Public surveys both online and in paper form; sharing the NDP with Calderdale Council; posters and flyers inviting the public to view the TNP and to provide comments; Pre-submission consultation for 6 weeks. All responses received at Regulation 14 consultation are included in this document.

1.3 Timeline of engagement activity

Community drop-in sessions

1. Saturday 12th March 2016, The Fielden Centre
2. Saturday 19th March 2016, Walsden St. Peter's Primary School
3. Saturday 2nd April 2016, The Old Library Cornholme
4. Saturday 9th April 2016, Todmorden Town Hall
5. Online and physical surveys (309 responses)

Topic or site specific engagement events

6. Saturday 28th January 2017, The future of key sites, Todmorden Town Hall
7. Saturday 11th February 2017, The future of housing, Todmorden Town Hall
8. Saturday 25th February 2017, Exploring local Infrastructure needs, Todmorden Town Hall
9. Saturday 15th July 2017, Town Council Visioning Session, Todmorden Town Hall
10. Saturday 22nd July 2017 Issues, Opportunities & Challenges, Central Methodist Church

Regulation 14 consultation

11. Thursday 21st September 2023, Community Consultation, Todmorden Town Hall
12. Saturday 23rd September 2023, Community Consultation, Todmorden Town Hall

1.4 Summary of initial engagement

There were 150 attendees at the initial 4 community drop-in sessions in 2016.

There were 309 responses to the online and physical survey that was shared in 2016 and 2017.

There was 130 attendees at the topic or site specific engagement events.

Several summary reports have been produced that detail the number and nature of comments and responses at all stages of engagement and consultation. These are included in this document.

A summary of the key issues and aspirations raised at initial engagement and consultation is below:

- Flood risk, mitigation and water management
- Heritage and conservation
- Community event spaces
- Food growing
- Sport, leisure and recreation
- Accessibility and movement
- Ensuring new homes meet the needs of local people
- Protecting green spaces and the environment
- Growing the local economy
- Skills, education and training

1.5 Developing the Plan

Following the initial engagement exercises summary reports were produced to help digest and understand the responses. Specific issues were identified and grouped thematically into potential policy areas for further consideration. These were:

- Housing
- Natural Environment
- Transport, accessibility, and movement
- Economic Development
- Town Centre
- Riverside and Canal
- Heritage
- Community, culture and recreation

A visioning session was held with Todmorden Town Councillors to establish a coherent vision that had full support of the Council.

Vision:

Todmorden will be an innovative and resilient town that responds effectively to the changing needs of its community. Emerging economic sectors will provide new jobs and new housing will be developed in line with community aspirations so that people of all ages have access to appropriate housing of a high quality. Tourism and leisure opportunities will be expanded to develop Todmorden as a thriving town for residents and visitors alike

Aims & Objectives

1. Encourage the right sort of development in the right places to meet the present and future needs of the community.
2. Encourage the best in design and placemaking that responds to and reinforces the local built environment.
3. Address issues relating to flooding and water management.
4. Promote sustainable economic development.
5. Encourage better levels of accessibility in existing and new developments and throughout the public realm.
6. Protect and enhance the natural environment.
7. Secure suitable, sustainable housing provision for young families, single people and older people, including affordable housing provision.
8. Support food growing in and around the town.
9. Reduce traffic, congestion and air pollution and encourage sustainable methods of travel and movement.
10. Enhance and develop new skills and training facilities.
11. Promote Todmorden as a visitor and tourist destination.
12. Encourage the promotion of arts, culture and leisure throughout the town through the use of flexible community space.
13. Retain and conserve heritage buildings to reinforce the distinctive character of Todmorden.
14. Promote and enhance the level of community facilities and services.

1.6 How consultation informed policy

This section shows how each policy is a response to issues raised throughout consultation and engagement.

- At initial engagement respondents said that flooding was a key concern and that the NDP should include policies around.

Relevant policies: **H4 Innovative Housing**
H8 Sustainable Drainage Systems (SuDS)
NE1 Millponds, Dams, and Attenuation Ponds

- At initial engagement respondents stated that they would like to see Todmorden improve its offer around leisure and tourism.

Relevant policies: **ED4 Visitor Accommodation**
CCR1 Community, Social, and Cultural Facilities
CCR3 Sport and Recreation

- At initial engagement respondents said that new homes should be fit for purpose, well-designed, and meet local needs.

Relevant policies: **H1 Infill Housing**
H2 Housing Mix
H3 Housing Design
H6 Sustainable Homes
H7 Inclusive and Accessible Homes
ED3 Homeworking

- At initial engagement respondents said Todmorden should retain its heritage and seek to reuse existing buildings

Relevant policies: **H5 Reuse and Conversion**
ED1 Reuse of Space
HG1 Heritage
TC1 Shop Front Design

- At initial engagement respondents said that the Plan should include policies to protect and enhance the natural environment.

Relevant policies: **NE2 Local Green Spaces**
NE3 Green Infrastructure
CR1 Canal and Riverside Improvements

- At initial engagement respondents said that the Plan should include policies that seek to grow the local economy

Relevant policies: **ED2 Innovative Working**
ED5 Retail
ED6 Light Industry
ED7 Broadband

- At initial engagement respondents said that the Plan should improve movement, and accessibility throughout the town

Relevant policies: **TM1 Walking and Cycling**
TM2 Movement and Access
TM3 EV Charging Points
TC2 Pedestrian Routes
TC3 Public Realm

At initial engagement respondents said the Plan should promote and encourage food growing throughout the town.

Relevant policies: **CCR2 Food Growing**

1.7 Regulation 14 Consultation

Regulation 14 consultation ran for 6 weeks from September 21st 2023 to November 2nd 2023.

This was promoted via social media, via posters and flyers around town and on the Town Council website.

In total there were 27 different respondents who provided formal comments at Regulation 14 consultation through either the online portal or at the drop-in.

In total over 75 people attended the drop-in sessions that were held on Thursday 21st September 2023 and Saturday 23rd September 2023.

In addition to capturing responses on the NDP it was felt that replicating the initial engagement survey would be helpful to compare and understand how views and priorities around Todmorden have changed given it has been almost 7 years since the project started. 47 responses were received and the results of this have been included in section 1.8 of this report and includes an assessment of how the results compare against the original outcomes from 2016-2017.

Statutory consultees were contacted and responses were received from Historic England, Natural England, the Environment Agency, and Calderdale Council. Calderdale Council's response was limited to only Local Green Spaces as they have previously provided detailed comments on the draft plan and the content has not changed since their suggested amendments were incorporated.

List of groups/bodies consulted at Regulation 14 Consultation:

Calderdale Council
United Utilities
Natural England
Environment Agency
Historic England
Sport England
Sustainable Places Yorkshire
Graham Hale – Todmorden Disability Forum
JTP Consultants – preparing Calderdale Placemaking and Design Guide

1.7 Regulation 14 Comments, TNP responses, and proposed actions

Name of consultee	Page/policy	Support, Support w/ modifications, Or Object	Consultee comment	TNP Response	Action
Calderdale Council	Local Green Spaces GS001 Adelaide Street		Acceptable proposal	Noted	No action
Calderdale Council	Local Green Spaces GS002 St Josephs Primary School		The proposed area is too built up to be an appropriate Local Green Space. Large areas are hard surfaced or contain buildings with no public access. Recommend either redrawing only to include the gardens to St Joseph's Church or deleting the LGS.	Noted	LGS removed
Calderdale Council	Local Green Spaces GS003 Roomfield Baptist Church		Acceptable proposal	Noted	No action
Calderdale Council	Local Green Spaces GS004 Patmos Gardens		Acceptable proposal	Noted	No action
Calderdale Council	Local Green Spaces GS005 Rose Street		This land is designated as a Regeneration Action Area (RAA02) by Policy SD7 of the Local Plan. Please see attached pages of the LP. Strongly recommend deletion of the LGS.	Noted	LGS removed

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Name of consultee	Page/policy	Support, Support w/ modifications, Or Object	Consultee comment	TNP Response	Action
Calderdale Council	Local Green Spaces GS006 St Marys Churchyard		Acceptable proposal	Noted	No action
Calderdale Council	Local Green Spaces GS007 Brown Birks Street		Acceptable proposal	Noted	No action
Calderdale Council	Local Green Spaces GS008 Coal Clough Road Allotments		This land is designated in the Local Plan as Area Around Todmorden, which is equivalent to Green Belt in its level of protection. Per Planning Practice Guidance (Reference ID: 37-010-20140306), consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.	Noted. It is felt that this site is demonstrably special to the local community and there would be additional benefit in designating this site as LGS. The Area Around Todmorden and LP policy GB2 do not mention retention of important community assets so it is felt additional designation is required to recognise the importance the site plays locally.	No action
Calderdale Council	Local Green Spaces GS009 Vale Baptist Church		Acceptable proposal	Noted	No action

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Name of consultee	Page/policy	Support, Support w/ modifications, Or Object	Consultee comment	TNP Response	Action
Calderdale Council	Local Green Spaces GS010 Tod Unitarian Church		This land is designated by Policy GN6 of the Local Plan as Open Space. Where sites are already protected consideration should be given to whether any additional benefit would be gained by designation as Local Green Space.	Noted	LGS removed
Calderdale Council	Local Green Spaces GS011 Centre Vale Park		Acceptable proposal	Noted	No action
Calderdale Council	Local Green Spaces GS012 Todmorden Cricket Ground		This land is designated by Policy GN6 of the Local Plan as Open Space. Where sites are already protected consideration should be given to whether any additional benefit would be gained by designation as Local Green Space.	Noted	LGS removed
Calderdale Council	Local Green Spaces GS013 Denis Field		This land is designated by Policy GN6 of the Local Plan as Open Space. Where sites are already protected consideration should be given to whether any additional benefit would be gained by designation as Local Green Space. Per NPPF para 102(b), if the site is considered to hold a particular local significance, including recreational value, it may be worthy of a double designation.	It is felt this site is worthy of double designation. This site was considered as a potential housing allocation and the inspector stated that the site is a “valued community facility” and a “holistic community asset” given its role in providing both leisure and recreation space and as a community orchard / growing area.	No action

1.7 Regulation 14 Comments, TNP responses, and proposed actions

Name of consultee	Page/policy	Support, Support w/ modifications, Or Object	Consultee comment	TNP Response	Action
Calderdale Council	Local Green Spaces GS014 Graveyard to Christ Church		This land is designated by Policy GN6 of the Local Plan as Open Space. Where sites are already protected consideration should be given to whether any additional benefit would be gained by designation as Local Green Space.	Noted	LGS removed
Calderdale Council	Local Green Spaces GS015 Meadow Bottom		This land is designated by Policy GN6 of the Local Plan as Open Space. Where sites are already protected consideration should be given to whether any additional benefit would be gained by designation as Local Green Space.	Noted	LGS removed
Calderdale Council	Local Green Spaces GS016 Stoney Royd Lane		This land is designated by Policy GN6 of the Local Plan as Open Space. Where sites are already protected consideration should be given to whether any additional benefit would be gained by designation as Local Green Space.	Noted	LGS removed
Calderdale Council	Local Green Spaces GS017 Scott Street Recreation Ground		This land is designated by Policy GN6 of the Local Plan as Open Space. Where sites are already protected consideration should be given to whether any additional benefit would be gained by designation as Local Green Space.	Noted	LGS removed
Calderdale Council	Local Green Spaces GS018 Walsden Cricket Club		This land is designated by Policy GN6 of the Local Plan as Open Space. Where sites are already protected consideration should be given to whether any additional benefit would be gained by designation as Local Green Space.	Noted	LGS removed
Calderdale Council	Local Green Spaces GS019 St Peters Churchyard Cemetery		This land is designated by Policy GN6 of the Local Plan as Open Space. Where sites are already protected consideration should be given to whether any additional benefit would be gained by designation as Local Green Space.	Noted	LGS removed

1.7 Regulation 14 Comments, TNP responses, and proposed actions

Name of consultee	Page/policy	Support, Support w/ modifications, Or Object	Consultee comment	TNP Response	Action
Historic England	Listed Buildings		Given the number of Listed Buildings in the Parish, it would be appropriate to include a more detailed narrative, recognising their important contribution to the character of Todmorden Parish, together with appropriate policies and cross references to the Design Guide (see below).	Noted.	The NDP will include more information and narrative around Listed Buildings in Todmorden.
Historic England	Conservation Areas		Both the Todmorden and Lumbutts & Mankinholes Conservation Area Appraisals (CAAs) are dated 2008 and the settlements are likely to have undergone considerable change in the intervening period. It would be appropriate to review both CAAs and incorporate the conclusions of these reviews, including changes to the boundary, assessments of both areas, new policies and recommendations to Calderdale Council into the Neighbourhood Plan.	The TNP does not have the resource or capacity to undertake this piece of work.	No action
Historic England	Scheduled Monuments & Archaeology		The Neighbourhood Plan makes no mention whatsoever of Scheduled Monuments & Archaeology. This omission should be addressed, with the help of West Yorkshire Archaeology Advisory Service and an appropriate narrative and policies included in the documents.	The TNP will liaise with WYAAS and will include information around Scheduled Monuments and Archaeology,	Include maps and narrative around Scheduled Monuments and Archaeology in Todmorden,

1.7 Regulation 14 Comments, TNP responses, and proposed actions

Name of consultee	Page/policy	Support, Support w/ modifications, Or Object	Consultee comment	TNP Response	Action
Historic England	Non-designated Heritage Assets		<p>Policy HG.1, pg. 69, para. 2 refers to Guidance provided from English Heritage . English Heritage do not provide guidance on the identification of non-designated heritage assets.</p> <p>Historic England's Advice Note 7, Local Heritage Listing: Identifying and Conserving Local Heritage (27th January 2021) provides the appropriate guidance and should be cited if the heritage assets identified in HG.1 comply with the recommended criteria.</p> <p>We would also point out that non-designated heritage assets are not confined to buildings alone; parks & cemeteries, monuments & memorials, bridges & locks, water courses & open water, archaeological sites and elements of the wider rural landscape can also fall into this category, and should be included in the Schedule and Map , with appropriate additional narrative and policies.</p>	Noted. Reference to English Heritage replaced with the correct reference as suggested.	Reference to English Heritage replaced with the correct reference as suggested
Historic England	Views & Vistas		<p>Given the Calder Valley's topography para. 1.2.18 acknowledgement of the importance of views of the Pennine landscape is welcome. However, the document does not follow through by identifying key views and vistas and incorporating narrative, images, maps and policies as appropriate. We suggest that this omission be addressed.</p>	The TNP does not have the resource or capacity to undertake this piece of work from scratch so will use the Todmorden Conservation Area Character Appraisal section on views and vistas as the basis for this.	Include views and vista section.

1.7 Regulation 14 Comments, TNP responses, and proposed actions

Name of consultee	Page/policy	Support, Support w/ modifications, Or Object	Consultee comment	TNP Response	Action
Historic England	Design Guide Listed Buildings		Listed buildings are only mentioned once in the Design Guide and given the much of the document is devoted to making recommendations on alterations, we would strongly suggest that a Listed Buildings section is included in the document, advising owners of listed buildings to consult Calderdale Council's Conservation Team and/or an accredited heritage consultant before considering making any alterations.	Noted	Listed building advice and guidance to be added
Historic England	Design Guide The Retrofit House		The Retrofit House illustration (pg.44) focusses understandably on flood prevention, but a key part of retrofitting historic buildings is ensuring such buildings have good thermal insulation. The illustration unfortunately shows a building with a cavity wall and a solid concrete floor, which were construction techniques which only became common in the early to midtwentieth century in domestic properties. As the majority of the Parish's domestic building stock is likely to pre-date these developments, a new illustration, relating to solid walled, or rubble filled wall construction with timber floors should be added, illustrating internal and external insulation and flood prevention/water proofing options.	Noted	Guidance to be included to demonstrate retrofitting thermal insulation to historic homes and drawing added showing solid walled or rubble filled wall construction with timber floors
Louise Kirkup	H2 Housing Mix		Policy should not put a number (10 dwellings) but should say that "all schemes should contribute".	Noted.	Policy changed to remove 10 dwellings and replaced with "all schemes should contribute".

1.7 Regulation 14 Comments, TNP responses, and proposed actions

Name of consultee	Page/policy	Support, Support w/ modifications, Or Object	Consultee comment	TNP Response	Action
Louise Kirkup	H3 Housing Design		Policy needs to refer to the design guide and other design SPDs	Noted	H3 to include reference to Todmorden Design Handbook and the Calderdale Placemaking and Design Guide
Louise Kirkup	H7 Inclusive and Accessible Homes		Policy should add location. “Located in places accessible to facilities and public transport”	Noted.	Policy amended to state that these homes should be located close to facilities and public transport.
Louise Kirkup	ED5 Retail		Support should be given to improvements of existing retail units in the town centre	Noted.	Policy amended to include support for improvements to existing retail units
Louise Kirkup	ED6 Light Industry		include services and offices in this policy	Noted.	Services and offices included in this policy
Louise Kirkup	Town Centre		Needs to balance the needs of existing residents and becoming more attractive to visitors	Noted	Added in aims and objectives
Louise Kirkup	TC2 Pedestrian Routes		enhance and improve connectivity into the countryside from town centre, include sensitive signage from town centre	Noted	Policy amended in line with suggestion.
Louise Kirkup	CR1 Canal and Riverside		Include opportunities to open up or renavigate the corridors along the water to celebrate the water	Noted	Policy amended in line with suggestion.
No name given			The NDP should support community-led renewable energy generation schemes	Noted	Noted. Policy CCR4 created to reflect this suggestion

1.7 Regulation 14 Comments, TNP responses, and proposed actions

Name of consultee	Page /policy	Support, Support w/ modifications, Or Object	Consultee comment	TNP Response	Action
United Utilities			<p>Thank you for your consultation seeking the views of United Utilities as part of the preparation of the Neighbourhood Development Plan (NDP) for Todmorden. United Utilities wishes to build a strong partnership with neighbourhood groups to aid sustainable development and growth.</p> <p>Todmorden is an area that borders the area of service of United Utilities. Much of the area is served by an alternative provider of water and wastewater services. That said, we do have assets and land within the Neighbourhood Area. Notably these assets include water supply assets and land owned by United Utilities including reservoirs and land used for the purposes of public water supply catchment. As such, it is important that we are kept up to date on the preparation of a new neighbourhood development plan (NDP). Our assets will need to be fully considered in any future proposals for development or use of land especially where this is on, or within close proximity to, our assets. It is important to note that we will not permit development over or in close proximity to our assets. All of our assets will need to be afforded due regard in the planning and development process. This should include careful consideration of development and landscaping proposals in the vicinity of our assets and any changes in levels of land over our assets.</p> <p>In the preparation of the new NDP, we would wish to engage with you on any potential new allocations. We strongly recommend that future applicants / promoters fully understand site constraints as soon as possible, ideally before any land transaction is negotiated and before commencing design work, so that the implications of our assets on development can be fully understood. Where our assets exist on a site, we ask applicants / developers to contact United Utilities to understand any implications. If considering future allocations or development proposals, we would request that contact is made with United Utilities to discuss the detail of the proposals at an early stage so that any potential issues can be explored and fully understood...(cont)</p>		

1.7 Regulation 14 Comments, TNP responses, and proposed actions

Name of consultee	Page/policy	Support, Support w/ modifications, Or Object	Consultee comment	TNP Response	Action
United Utilities			<p>We encourage you to direct future developers to our free pre-application service to discuss their schemes and highlight any potential issues by contacting:</p> <p>Developer Services – Water Tel: 0345 072 6067 Email: DeveloperServicesWater@uuplc.co.uk</p> <p>Water Catchment Land</p> <p>United Utilities wishes to note that large parts of the Neighbourhood Area in the hills above Todmorden are public water supply catchment land. This is land which feeds reservoirs that are critical to public water supply resources. Development proposals on water catchment land can have an impact on water supply resources and therefore we recommend that you include a policy which identifies the need to engage with the statutory undertaker for water to determine whether any proposal is on land used for public water supply catchment purposes. Please get in touch for information on the location of catchment land in the Neighbourhood Area.</p> <p>In cases of wind energy proposals on water catchment land, the applicant should seek to locate development so that the impact on public water supply is minimised through the location of the development and through the undertaking of appropriate risk assessments and inclusion of mitigation measures in the design and construction process. It is particularly important to avoid the location of new wind turbines on deep peat land....(cont)</p>		

1.7 Regulation 14 Comments, TNP responses, and proposed actions

Name of consultee	Page/policy	Support, Support w/ modifications, Or Object	Consultee comment	TNP Response	Action
United Utilities			<p>We recommend you include the following policy relating to water catchment land in your new NDP.</p> <p>“Development proposals on land used for public water supply catchment purposes will be required to consult with the relevant water undertaker. The first preference will be for proposals to be located away from land used for public water supply purposes. Where proposals are proposed on catchment land used for public water supply, careful consideration must be given to the location of the proposed development and a risk assessment of the impact on public water supply may be required with the identification and implementation of any required mitigation measures.”</p> <p>Water Efficiency Measures</p> <p>A number of properties within Walsden are served by a public water supply provided by United Utilities. As a result, we recommend that Policy H.6 Sustainable Homes is amended to state:</p> <p>“Residential developments are encouraged to meet the highest standards of energy and water efficiency and sustainable construction including the use of on-site renewable energy provision.”</p> <p>A tighter water efficiency standard in new development has multiple benefits including a reduction in water and energy use, as well as helping to reduce customer bills. Water efficiency is therefore a key component of any response to the climate emergency and our journey to net zero.</p>	Noted.	<p>Suggested policy text added to policy NE1</p> <p>‘and water’ added to H6</p>

1.7 Regulation 14 Comments, TNP responses, and proposed actions

Name of consultee	Page/policy	Support, Support w/ modifications, Or Object	Consultee comment	TNP Response	Action
Diana Englefield Forrest			A town that need to make the most of what it has while developing new well paid work in ecological improvement	Noted	No change
Janine Wigmore			Do not spend money on new builds (carbon intensive), invest in refurb of unused buildings and green infrastructure	The NDP contains two policies supporting the reuse and conversion of existing buildings. Policy H5 Reuse and Conversion and ED1 Reuse of Space both support and encourage the reuse of existing buildings in Todmorden. However given the need for new homes and business space it cannot be expected that this alone could satisfy demand. The NDP also includes policies supporting and encouraging sustainable and low carbon buildings.	No Change.
Aleks Leonard Rawlings			fix the Bandstand	It is understood that Todmorden Town Council are in the process of resolving this issue.	No change.
Margaret Mytton			For the most part it is a kind and friendly caring place to be	Noted	No change
Anne Storah			Great place to live, lots of character and community spirit!	Noted	No change

1.7 Regulation 14 Comments, TNP responses, and proposed actions

Name of consultee	Page/policy	Support, Support w/ modifications, Or Object	Consultee comment	TNP Response	Action
Shelley Burgoyne			I would like to comment on the Neighbourhood Plan. I would like to see Denis' Field listed as part of the Green Infrastructure in NE3 page 50, as the Todmorden Town Council has already committed to designating DF as a local Green Space. It could also be included as a Local Wildlife Site on the map on page 51.	<p>Noted.</p> <p>The map on p51 (now p53) was produced by West Yorkshire Ecology and was not produced by TTC or the planning consultants. The map shows designated sites such as SSSI, SPA, SAC, and the Calderdale Wildlife Habitat Network, LNR, and Local Geological Sites. Denis' Field is not designated as any of these designation.</p> <p>The NDP is unable to designate Denis' Field as any of these designations or amend the map to include Denis' Field.</p>	Include Denis' Field on the list of green infrastructure spaces on Policy NE3.
Ave Brown			If it aint broke dont fix it	<p>Noted.</p> <p>TTC and residents have highlighted a number of areas where Todmorden could be improved. Whilst Todmorden is not 'broken' there is definitely room for improvement</p>	No change
Kevin Marshall			It has a great community spirit	Noted	No change
Sam Leonard Rawlings			It has so much potential	Noted	No change
Bob Colcombe			It's been sad to see local businesses closing down since the cost of living crisis late last year. E.g Yakumama	Noted	No change

1.7 Regulation 14 Comments, TNP responses, and proposed actions

Name of consultee	Page/policy	Support, Support w/ modifications, Or Object	Consultee comment	TNP Response	Action
Richard Baron			Its a lovely town	Noted	No change
Richard Dale			Its wonderful	Noted	No change
Trish Taylor & Ernest Crossley			keep parking and good medical centre. Proper little english town- small and active integration of immigrants.	Noted	No change
M G Beardwood			leaver market area as it is	Noted. The market may be subject to enhancements as part of the Town Deal. The NDP also supports improvements to the public realm around the markets.	No change
Susan Cockcroft			More police presence and a police station that is open	Noted. This is outside of the scope of the NDP.	No change
Julie Wood			not enough has been done to prevent eyesore businesses opening	The Design Handbook contains design guidance for shop fronts and the NDP contains policy TC1 Shop Front Design.	No change
Jackie Ackland			Restrict 2nd homes and air bnb, more affordable homes for local people, keep the parking for the market and improve the link to the canal through lever street car park.	We do not have the data which shows what % of homes in Todmorden are 2nd homes. The NDP supports the creation of visitor accommodation so it would be contradictory to restrict air bnbs. The NDP supports the development of more affordable homes. The number of retained parking spaces at the market will not be determined by the NDP The NDP support improved connectivity to the canal	No change

1.7 Regulation 14 Comments, TNP responses, and proposed actions

Name of consultee	Page/policy	Support, Support w/ modifications, Or Object	Consultee comment	TNP Response	Action
Rita Frayne			stop closing things - no bank no ticket office.	Noted.	No change
Denise Wilson			The centre of Todmorden is a carpark We need to develop a centre with shops, cafes and places where the community can gather. The new traffic lights are causing congestion and the zebra crossing from bridge street is hazardous for drivers and pedestrians.	Noted. The NDP supports and encourages the creation of new retail spaces and community spaces. Retention of parking spaces has been a key comment received from members of the public. Any changes to the level of car parking will have to balance different needs and views.	No change
Joan Davies			The town is struggling at the moment with loss of shops suitable for we older people to frequent	Noted. The NDP supports new retail spaces	No change
Catherine Storah			There are no bus services after 8 o'clock to outlying villages - an hour walk home late at night.	Noted. This is outside of the scope of the NDP	No change

1.7 Regulation 14 Comments, TNP responses, and proposed actions

Name of consultee	Page/policy	Support, Support w/ modifications, Or Object	Consultee comment	TNP Response	Action
Penny Price			<p>There is a need to improve gateways into he town. There are some very poor quality finishes on major routes into and out of the town, because the planning authority has not made developers provide high quality solutions to boundaries etc. Two examples are the shocking boundary fence next to the main road adjacent to the Lidl site. shame on Calderdale for not making Lidle give the town a well designed piece of public land here. Instead they were fobbed off with excuses about cost, so now we are left with an eyesore. A second less unsightly but still poor is the close boarded fence abutting Burnley Road on the new housing site formerly M&G caravans.</p>	<p>Noted.</p> <p>Calderdale is producing a placemaking and design guide which hopefully will address some of these issues.</p>	No change
Paul Jackson			<p>There's a lot of blocked drains with a build up of leaves / soil. They don't get cleaned / cleared so I this doesn't help with the water draining from the hills into the town centre.</p>	Noted.	No change
Jeremy Green			<p>Tod is a great place that needs to both preserve what it has and at the same time take some lessons from Hebden Bridge - I don't want it to BE Hebden, but that town is a great example of good town design/plans. Great look/feel, good facilities, nice shops and pubs etc., Tod is a bit of a dump in comparison.</p>	<p>Noted.</p> <p>The NDP has policies to help support its heritage and to encourage high quality design</p>	No change
Jacqui Mathews			<p>Todmorden is struggling to accommodate (both in hotels etc and in terms of infrastructure) the number of visitors it receives.</p>	<p>Noted.</p> <p>The NDP has policies to encourage visitor accommodation</p>	No change

1.7 Regulation 14 Comments, TNP responses, and proposed actions

Name of consultee	Page/policy	Support, Support w/ modifications, Or Object	Consultee comment	TNP Response	Action
Barry Cook			Todmorden needs to recognise, preserve and celebrate its public green areas. I would like to see Denis' Field (Postcode OL14 5LT) listed as part of the Green Infrastructure in NE3 page 50, as the Todmorden Town Council has already committed to designating Denis Field as a local Green Space. I would also like it to be included as a Local Wildlife Site on the map on page 51.	Noted. The NDP does not have the ability to list the site as a Local Wildlife Site but it is included as a Local Green Space and has been added to the list of green infrastructure spaces	No change
Paul Jeremy Wood			too many eyesores in the town centre - empty shops. Roller shutters are horrible.	Noted. The Design handbook discourages roller shutters and support more appropriate security measures.	No change
Lydia Green			Traffic management is poor, the new crossings in town centre have made things worse - there is an unofficial 'by-pass' regularly operating over stansfield hall with high volumes of through traffic often travelling at high speeds making it dangerous to cross the road and to see when emerging from side roads. The 20 mph speeds are not observed here or over park rd. Victoria road is difficult to use due to heavy parking,	Noted.	No change
Anthony Andrew Hollis			Two of the most remarkable things about Todmorden are its sense of community and natural kindness which unites us.	Noted.	No change
Douglas Wilson			We should treasure our "oasis" status between Manchester and Leeds	Noted.	No change

1.7 Regulation 14 Comments, TNP responses, and proposed actions

Name of consultee	Page/policy	Support, Support w/ modifications, Or Object	Consultee comment	TNP Response	Action
Thomas Reid			wider public footpaths, cycle lanes , not convinced about traffic calming measures.	Noted	No change
Terry Sullivan			would like more restaurants and bars	Noted	No change
Graham hale			<p>I have worked on projects in Todmorden I'm a member of The Accessible Calderdale Project and I do the Step free Access map for the Hebden Bridge Disability Access forum part of Hebden Road town Council</p> <p>I've looked at the document there is a mention for that Todmorden is Dementia friendly which is good but that could be or included in a section on Accessible Todmorden that covers all disabilities or in a Accessibility statement this should cover all disabilities</p> <p>The Accessible Calderdale project has and myself tried after the Covid lock down to restart Todmordens own Access Forum there was some signs but its not got any further and it felt like we was stepping of people feet.</p> <p>Sadley though their key projects that the people running these need feedback and consult with disabled people and residents many have time constraints</p> <p>I will help all I can on this</p>	Noted	Additions made to accessibility section

1.7 Regulation 14 Comments, TNP responses, and proposed actions

Name of consultee	Page/policy	Support, Support w/ modifications, Or Object	Consultee comment	TNP Response	Action
Steve Martin	Design Guide		<p>Solar panels in the same style as the tiles or slates that they replace</p> <p>Integrated solar panels should be automatically permitted in slate and tile roofs on non-road facing roofs</p> <p>Standard solar panels should be automatically permitted on non-road facing roofs</p>	Noted.	Include section on PV panels in design guide
Sport England			<p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>Therefore, it is essential that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 98 and 99. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.</p>		

1.7 Regulation 14 Comments, TNP responses, and proposed actions

Name of consultee	Page/policy	Support, Support w/ modifications, Or Object	Consultee comment	TNP Response	Action
Sport England			<p>https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy</p> <p>Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.</p> <p>https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications</p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 99 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p>		

1.7 Regulation 14 Comments, TNP responses, and proposed actions

Name of consultee	Page/policy	Support, Support w/ modifications, Or Object	Consultee comment	TNP Response	Action
Sport England			<p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.</p> <p>http://www.sportengland.org/planningtoolsandguidance</p> <p>If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.</p> <p>http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</p> <p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p>		

1.7 Regulation 14 Comments, TNP responses, and proposed actions

Name of consultee	Page/policy	Support, Support w/ modifications, Or Object	Consultee comment	TNP Response	Action
Sport England			<p>In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</p> <p>PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing</p> <p>Sport England's Active Design Guidance: https://www.sportengland.org/activedesign</p>		

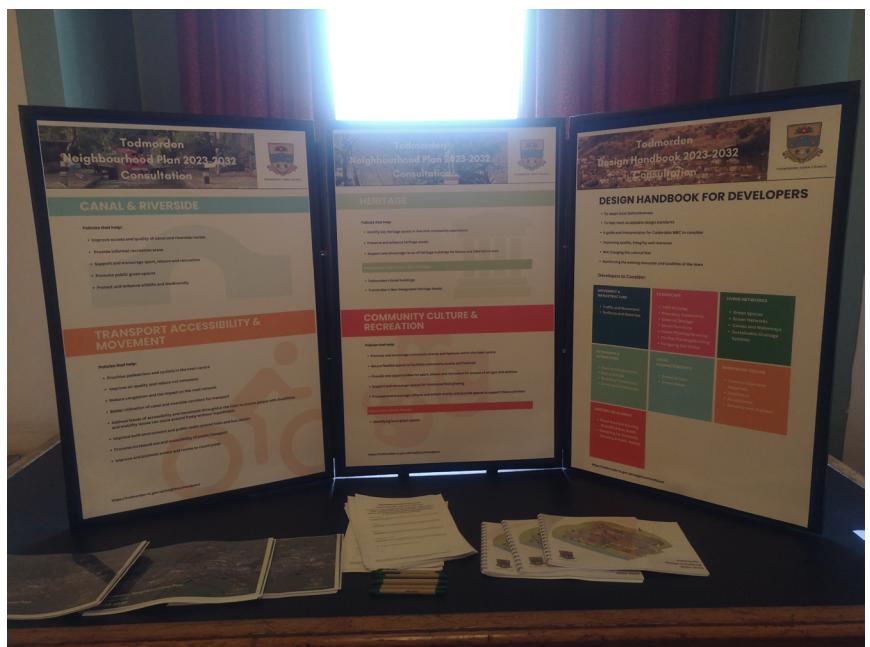
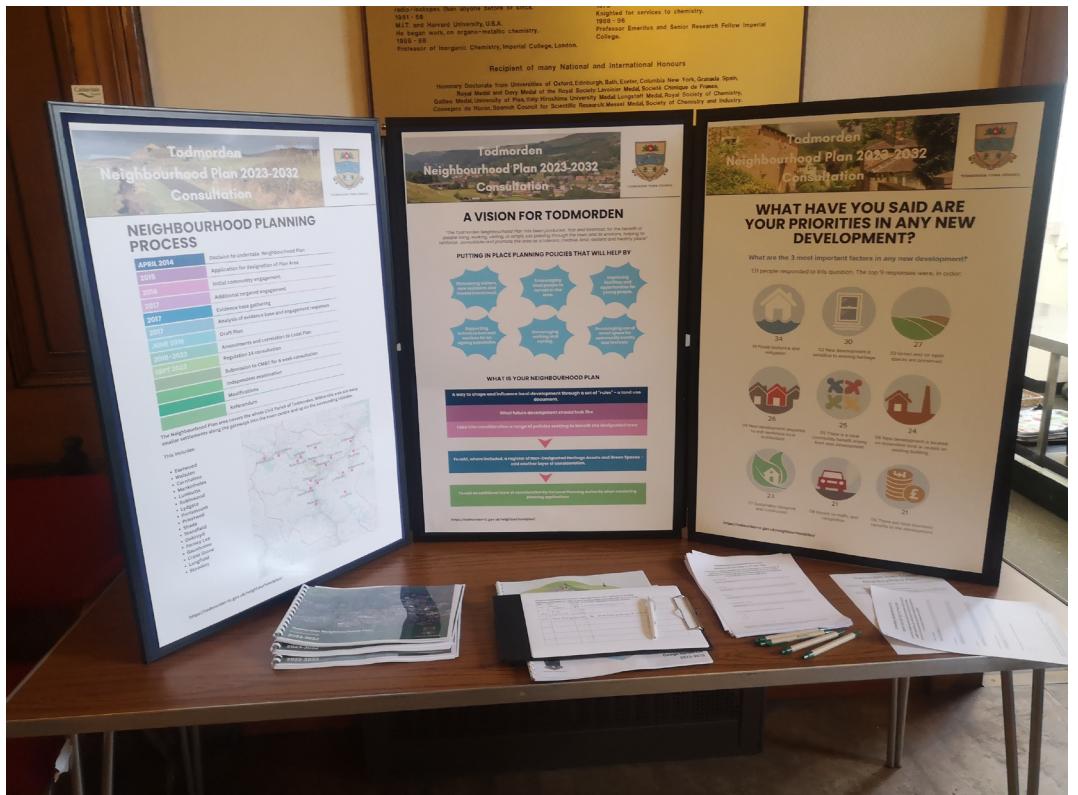
1.7 Regulation 14 Comments, TNP responses, and proposed actions

Name of consultee	Page/policy	Support, Support w/ modifications, Or Object	Consultee comment	TNP Response	Action
Sport England			<p>Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)</p> <p>If you need any further advice, please do not hesitate to contact Sport England using the contact details below.</p> <p>Yours sincerely,</p> <p>Planning Technical Team</p>	<p>Noted. The NDP supports and encourages the creation of new sport and recreational facilities, and seeks to protect important green spaces, some of which are used for sport.</p>	No change
Steve Martin			Design guide and NDP should include guidance/policy on retrofitting EV charging points	Noted	Mention of and guidance for retrofitting EV charging points included in NDp and design code

1.8 Photos of Regulation 14 consultation



1.8 Photos of Regulation 14 consultation



Validation of 2017 key data

1. Background

- 1.1 In 2017 a series of workshops were held to provide a base of information by which to determine what policies may be needed within the Neighbourhood Plan.
- 1.2 Delays in Calderdale MBC progressing the Local Plan meant that the Neighbourhood Plan would also be delayed.

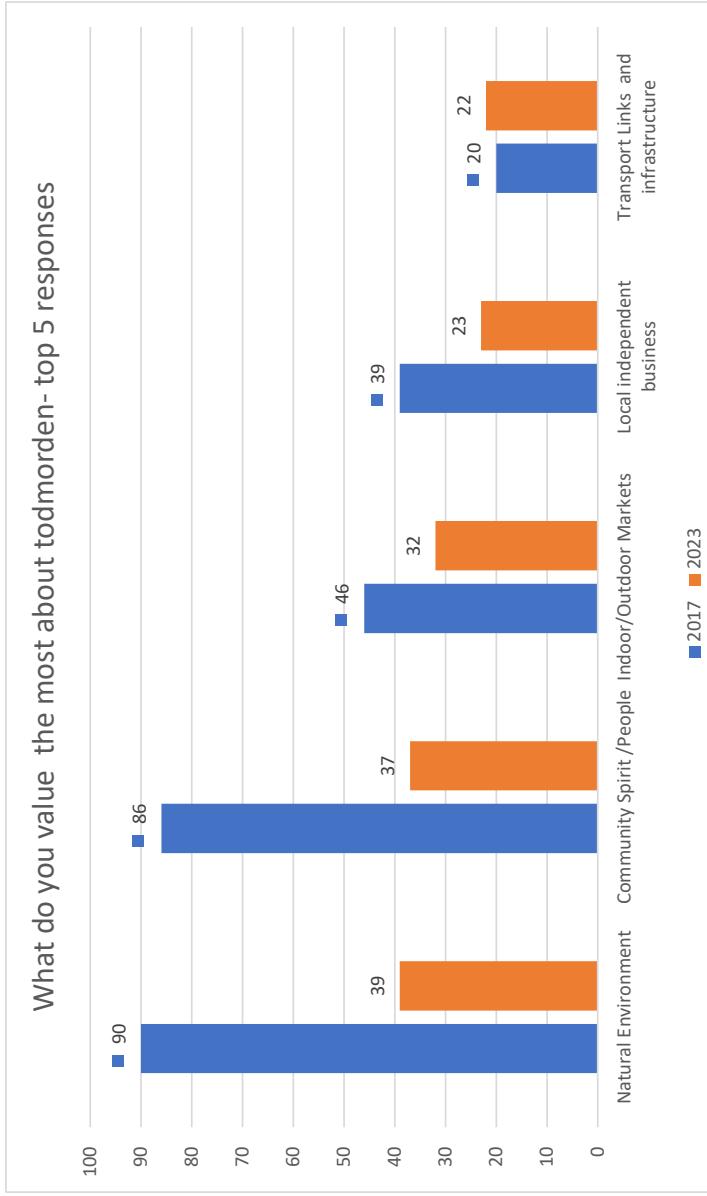
1.3 Whilst policies were formulated and included as part of the consultation draft the opportunity was taken to introduce a survey (paper and online) to either validate or identify substantive differences to four key questions that would enable us to consider whether any focus or change in policies are required.

- What do you value most about Todmorden?
- What new development does Todmorden need?
- What are your worries for the future of Todmorden?
- What are your 3 most important aspects in any new development?

1.4 The consultation event saw over 75 persons attending and at the end of the consultation period 47 survey responses were received

Consultation Responses

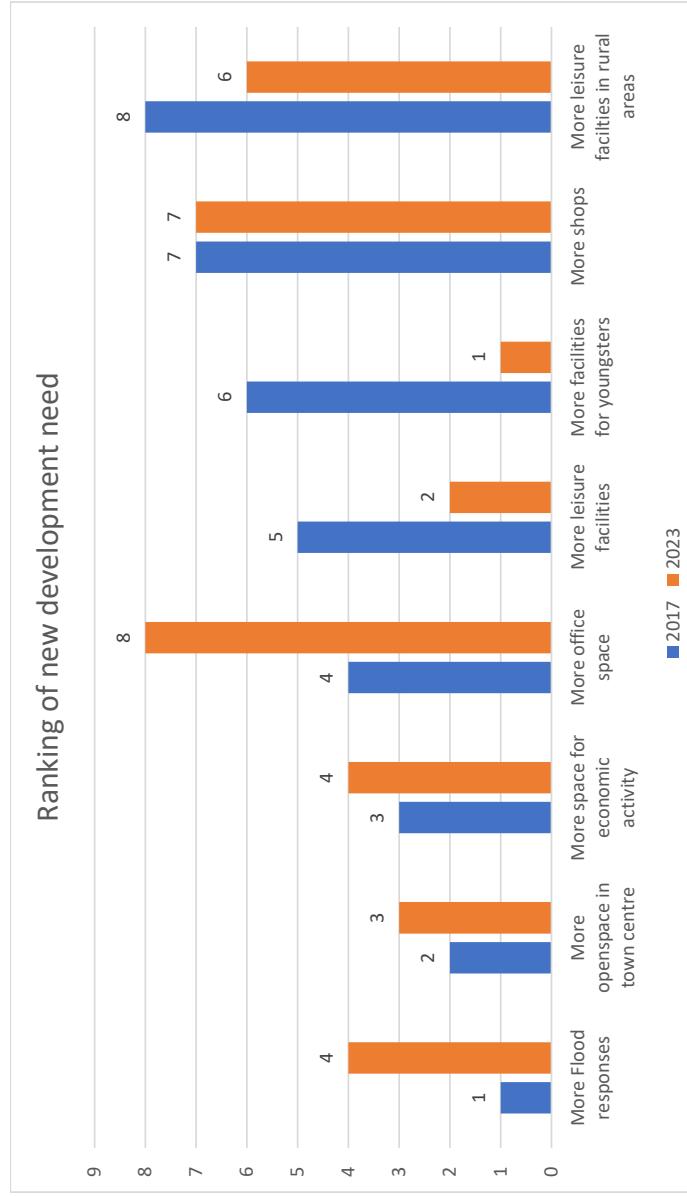
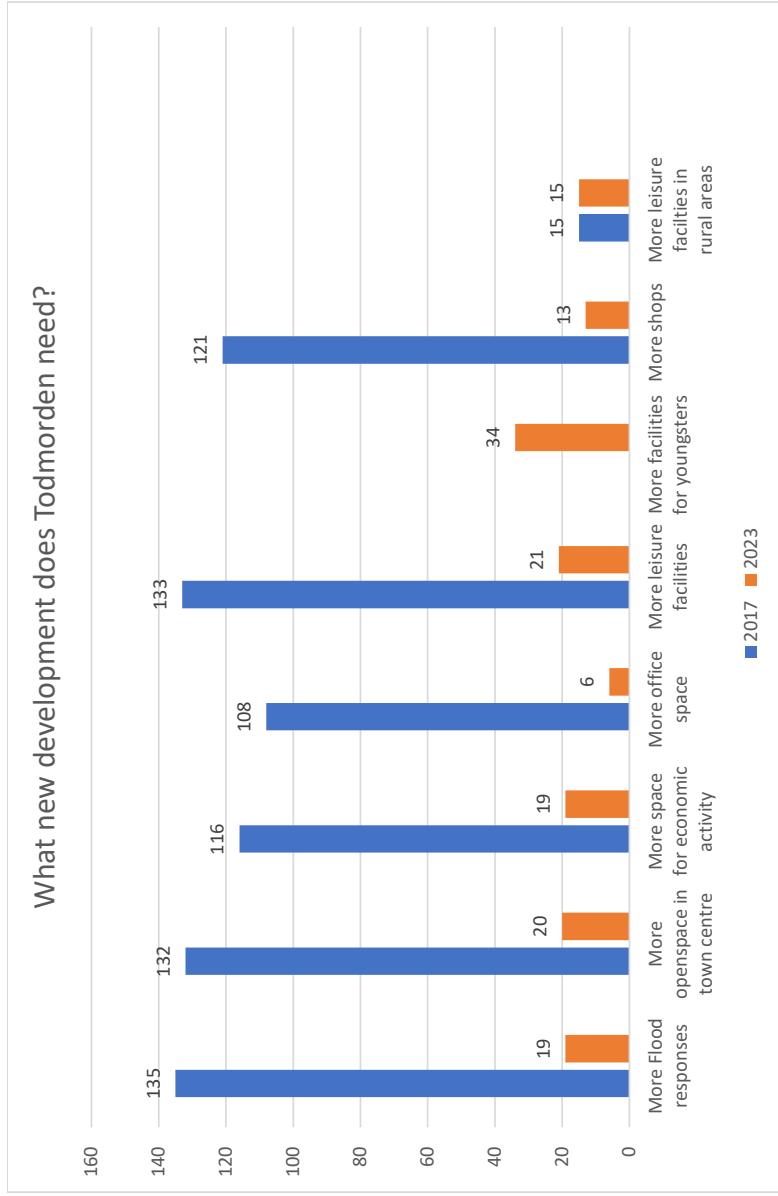
2.1 What do you value most about Todmorden?



1.9 Comparison of Reg 14 survey results to initial survey results

- 2.1a There were 10 factors to consider. Whilst the sample size now may be substantially less than in 2017 residents felt exactly the same in terms of what the top 5 would be and in the same order.

2.2 What new development does Todmorden need?



1.9 Comparison of Reg 14 survey results to initial survey results

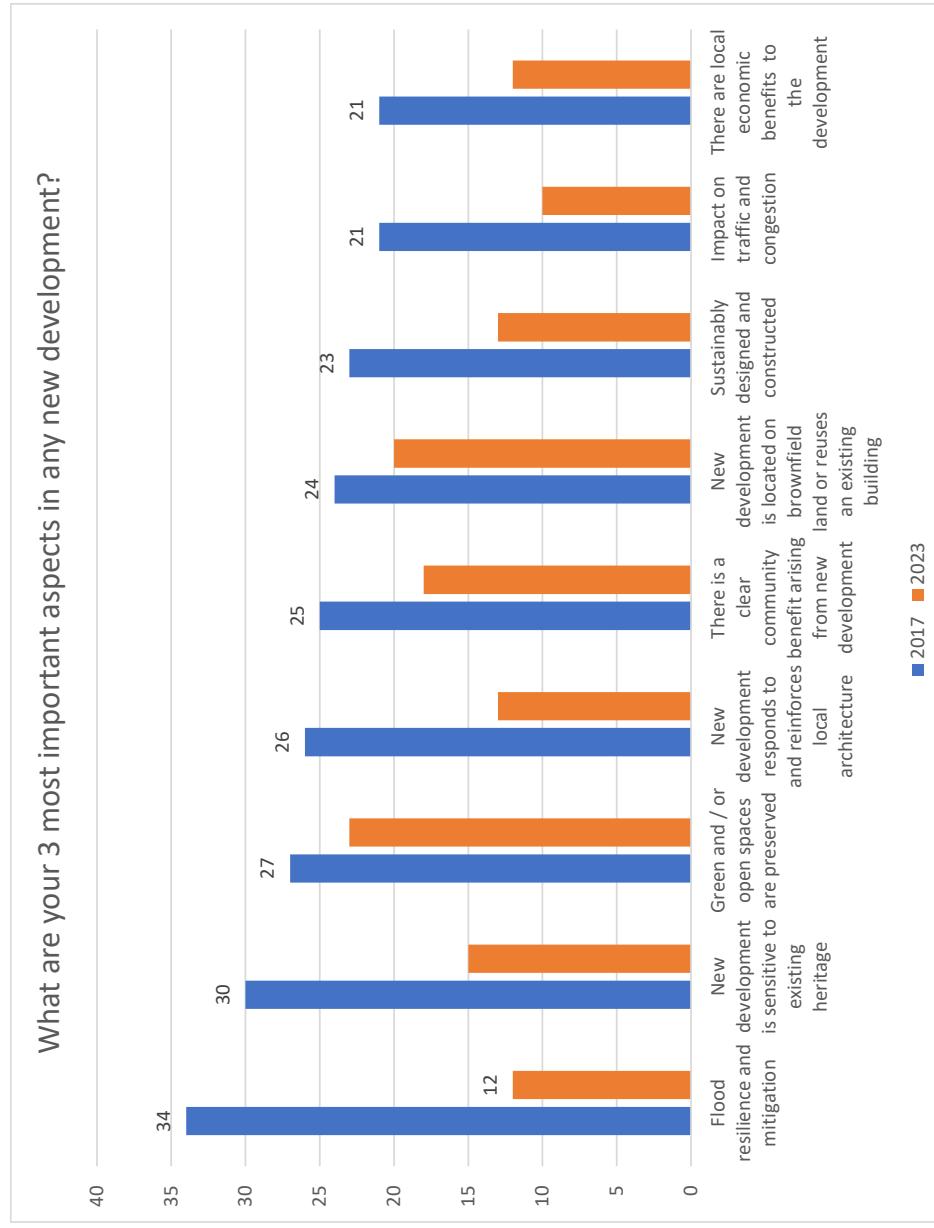
- 2.2a When considering by ranking of new development need there are four variances to consider in terms of policy amendment /addition.
- More facilities for youngsters- ranking from 6 to 1
 - More leisure facilities – ranking from 5 to 2
 - More responses -ranking from 1 to 4
 - More office space – ranking from 4 to 8
- 2.2b Without more in depth focus group work on each of these measures it is difficult to draw a comparison as to what has changed priority, but potential suggestions could be:-
- Concerns about increasing youth related anti-social behaviour.
 - Concerns re flooding have lessened as impact of 2105 event lesson in memory and more infrastructure work has taken place to mitigate future flooding impact.
 - Need for more office space may be influenced by type- small incubator space- as impact of covid pandemic potentially created more self-employed/small business demand.
- 2.3 What are your worries for the future of Todmorden?
-
- | Concern | 2017 Rank | 2023 Rank |
|----------------------------------|-----------|-----------|
| Threats to Town Centre | 1 | 1 |
| Flooding | 2 | 2 |
| Loss of Green Open Space | 3 | 4 |
| Loss of Investment | 4 | 3 |
| Loss of Character | 5 | 4 |
| Levels of Crime | 6 | 6 |
| Underdeveloped Services/Essences | 7 | 7 |
| Lack of Affordable Housing | 8 | 8 |
| Over-Development | 9 | 9 |
| Poor Infrastructure | 10 | 10 |
| Levels of Traffic | 11 | 11 |
| Educational Provision | 12 | 12 |
| Public Transport | 13 | 13 |
| Education provision | 14 | 14 |
- 2.3a When considering by ranking of worries for the future use of there are five variances, where movement is 3 places or above to consider in terms of policy amendment / addition
- Public Transport – ranking 14 to 7
 - Employment – ranking 9 to 13
 - Flooding - rank 2 to 6
 - Education provision – rank 13 to 10

1.9 Comparison of Reg 14 survey results to initial survey results

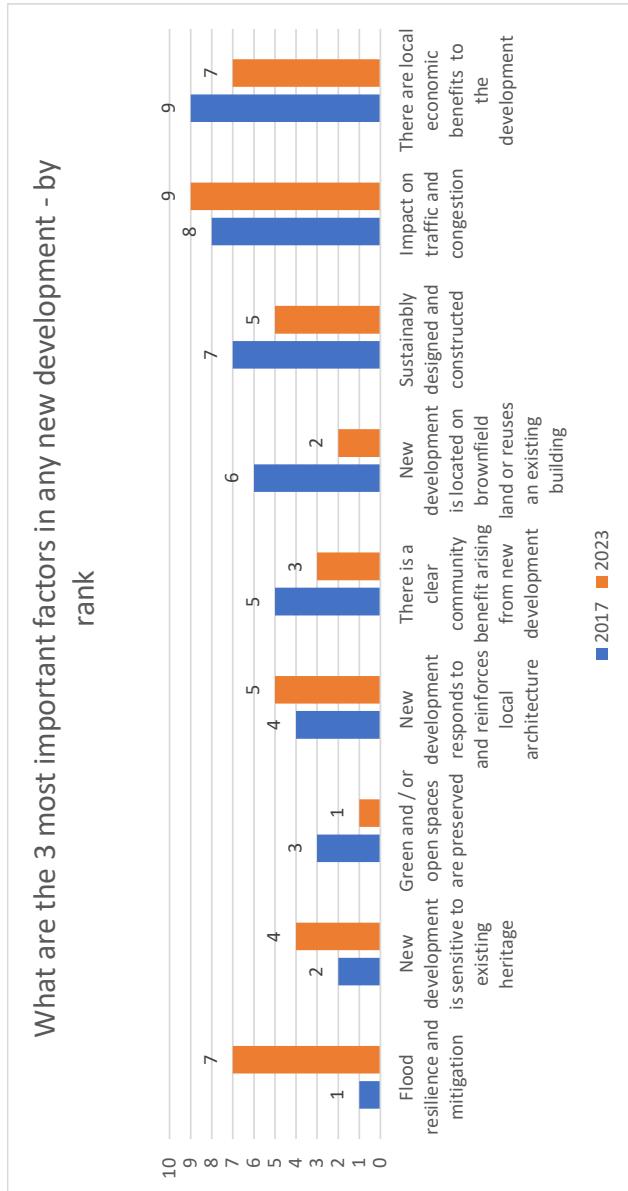
2.3b Without more in depth focus group work on each of these measures it is difficult to draw a comparison as to what has changed priority, but potential suggestions could be:-

- Emerging concerns in 2109 about reduction in bus services ahead of then the covid pandemic and return of bus services.
- Census data revealed 78.2% are in employment
- Flooding concerns as with paragraph 2.2a appear to be of less importance.
- General concerns about education prevail
- Concerns may be reflective of concerns about development impact on the look and feel of Todmorden.

2.4 What are your 3 most important aspects in any new development?



1.9 Comparison of Reg 14 survey results to initial survey results



- 2.4a When considering by ranking of worries for the future use of there are two variances, where movement is 3 places or above to consider in terms of policy amendment / addition.

Flood resilience and mitigation – rank 1 to 7

New development is located on brownfield land or reuses - rank 6 to 2 an existing building

- 2.4b Without more in depth focus group work on each of these measures it is difficult to draw a comparison as to what has changed priority, but potential suggestions could be:-

- Reinforces paragraphs 2.2b and 2.3b that flooding is not as high on the agenda of residents' concerns as in 2017.
- Reflects also loss of character concerns.

Policy Framework

- 3.1 Overall policies were informed by the 2017 consultation and workshop events and reflected people main concerns at that time taking into account:-

- What do you value most about Todmorden?
- What new development does Todmorden need?
- What are your worries for the future of Todmorden?
- What are your 3 most important aspects in any new development?

- 3.2 The comparative responses to these four questions between 2017 and 20-23 indicate that there is no substantive change needed to the overall Policy Framework, but that some modification may be needed to reflect changing emphasis arising out of the 2023 response under certain policy headings.

- 3.3 The Table below summarises where consideration may need to be given to either introduce new policies and/or strengthen/change the focus in existing policies.

2.0 Initial engagement in March and April 2016

Todmorden Neighbourhood Plan This is what you've said so far.....

Feedback presentation from workshops:

- | | |
|-----------|---------------------|
| 12.3.2016 | Fielden Centre |
| 19.3.2016 | Walsden |
| 2.4.2016 | Cornholme |
| 9.4.2016 | Todmorden Town Hall |



The Planning
Cooperative



Todmorden Town Council





Housing in Todmorden

- A sensible, small-site approach to new housing developments which takes full account of their visual impact and the associated flood risks
- A greater mix of housing types and tenures to ensure that all members of the community are able to find suitable housing to match their needs
- New housing to be designed with increased use of green and sustainable technologies and materials to reduce the carbon footprint of developments and lower residents' energy usage
- New housing to respect and reflect the distinctive and rural vernacular of Todmorden and the Calder Valley





The local economy

- Expansion of tourism and leisure industry including a Tourism centre, a museum, an art gallery and a greater provision of overnight accommodation for visitors
- Diversification of the local economy by supporting new employment initiatives such as co-working and micro-business spaces
- Support and expansion of existing economic sectors such as manufacturing, light industry and agriculture through new employment spaces
- Continued support in preference of independent stores as opposed to larger chain stores and the refurbishment of the markets to provide a quality local shopping experience
- Increased opportunities for local apprenticeships and training and education for adults





Flooding and water

- Closer working relationships with all relevant flood and water organisations and bodies
- Flood impact and mitigation to be seriously considered and planned for in any new development
- Promotion of holistic flood management and defences. Including reuse of existing dams and creation of new dams, strategic hillside planting, moss and peat restoration, and the reduction of hard surfaces where possible in favour of sustainable urban drainage systems and permeable surfaces.





Built environment

- New developments to respect and reflect the historic and rural vernacular of the town
- More sustainable and renewable features incorporated into buildings to help lower their environmental impact and reduce the risk of flooding
- New flexible open spaces in the Town Centre to be designated as public space for community events and public festivals
- Support and promote the temporary use of vacant buildings for the benefit of the community
- Protection and conservation of special local heritage and historic buildings
- An improved consistent design approach to the appearance of shop frontages





Natural environment

- Preserve Greenbelt and green spaces and develop Brownfield sites first as not to detract from the rural nature and feel of the town
- Protect and preserve the natural environment, wildlife and the rural nature of Todmorden
- Reduce air and light pollution and address the issues of litter and dog waste more effectively to give a cleaner, less polluted Todmorden
- Develop renewable energy technologies to provide a sustainable energy supply for the local community
- Preserve and enhance the canal side to become a valued leisure and tourism asset
- More effective management of and accessibility to the moors and woodlands including additional signage, litter bins, benches and overall footpath maintenance



2.0 Initial engagement in March and April 2016



Movement and transport

- Cycle lanes in and around Todmorden in order to promote safe, sustainable transport methods and to lower levels of car dependency
- Traffic calming measures to reduce vehicle speeds on main roads. Includes creating shared surfaces in the town centre to lower traffic speeds and increase levels of pedestrian movement and accessibility
- Improved disabled access at Todmorden train station on platform 2
- Charging points for electric vehicles located in town centre car park
- Free car parking on market days





Health and Wellbeing

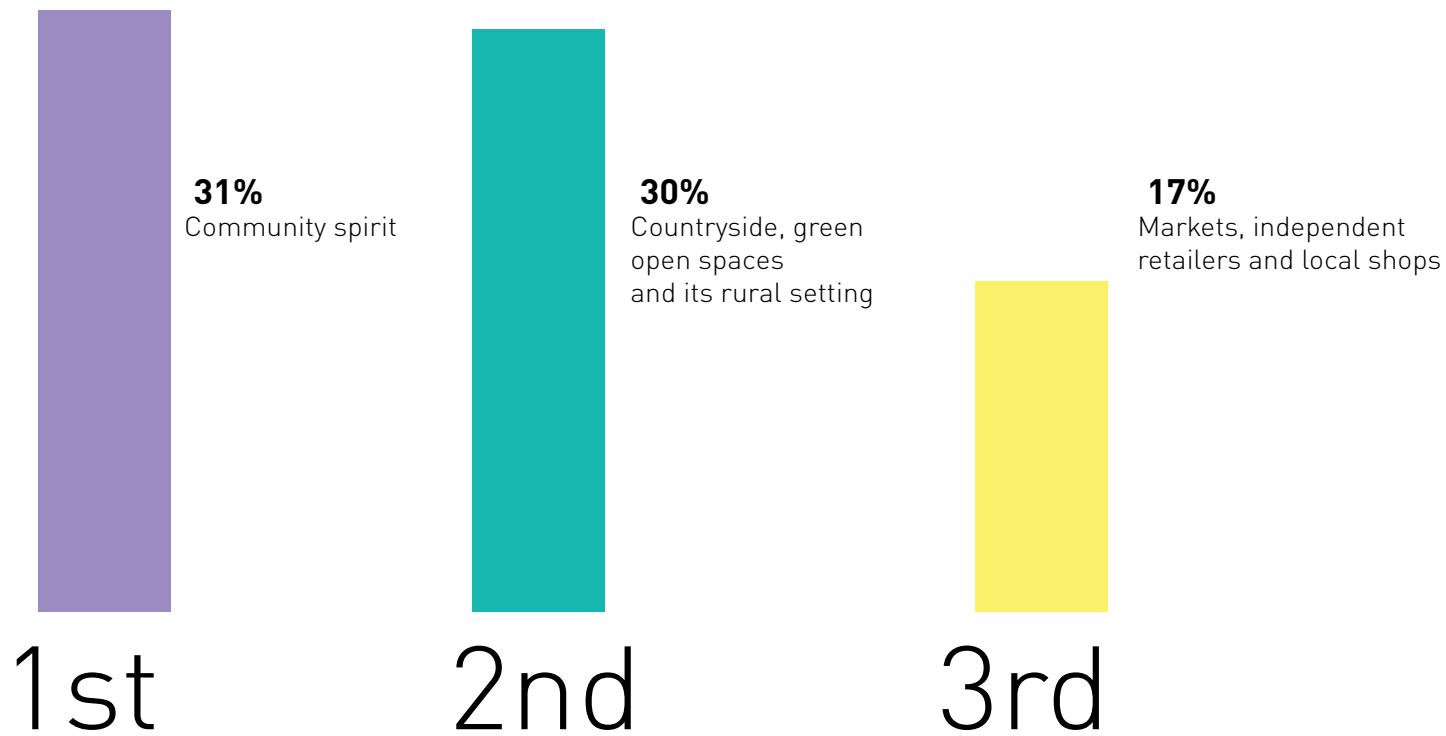
- More exercise opportunities for people of all abilities and play and recreation spaces for young people including suitable football pitches
- More opportunities for food production with community allotments and grow sites and greater community participation around food growing
- Better use of the health centre's facilities through space sharing initiatives with local groups and organisations to provide more local services





Survey Responses

What do you value the most about Todmorden?

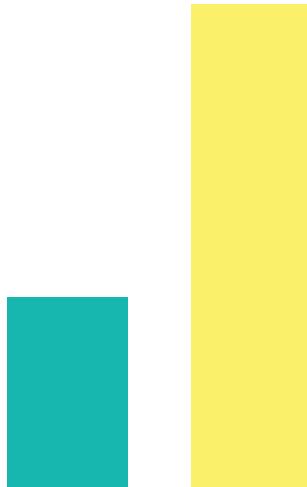




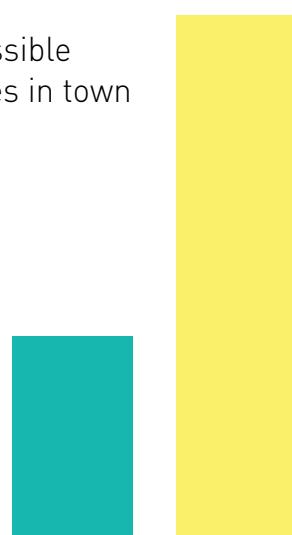
Survey Responses

What does development Tod need?

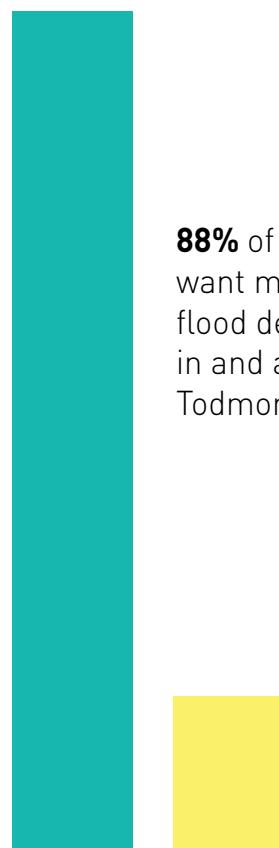
60% of people would like more affordable housing in town



64% of people would like more accessible homes in town



88% of people want more flood defences in and around Todmorden





Survey Responses

What does development Tod need?

82% of people
would like more
public open spaces
in town



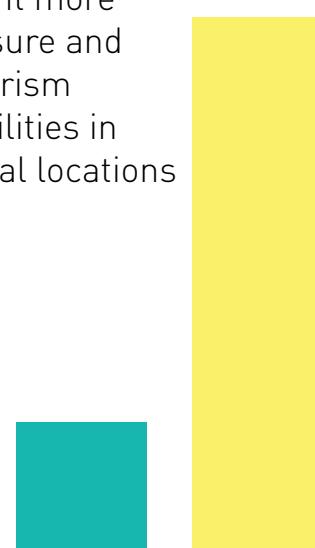
44%
Need urgently
38%
Desirable

72% of people
would like
more
leisure and
tourism
facilities in
town



26%
Need urgently
46%
Desirable

56% of people
want more
leisure and
tourism
facilities in
rural locations



11%
Need urgently
45%
Desirable



Survey Responses

What does development Tod need?

57% of people would like more office employment space in town



14%
Need urgently
43%
Desirable

55% of people would like a greater provision of retail and shops in town



13%
Need urgently
42%
Desirable

61% of people want more light industrial and workshop space for employment



15%
Need urgently
46%
Desirable

2.0 Initial engagement in March and April 2016

Thank you for participating in the community workshops which form an essential part of the Todmorden Neighbourhood Plan.

Your comments will now inform the scope and content of the Plan for the benefit of the community.

Feedback has been translated into broad strategies which are outlined within this presentation.

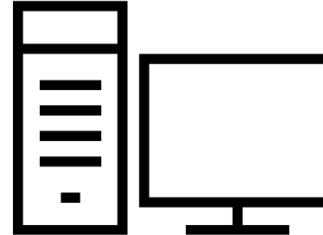
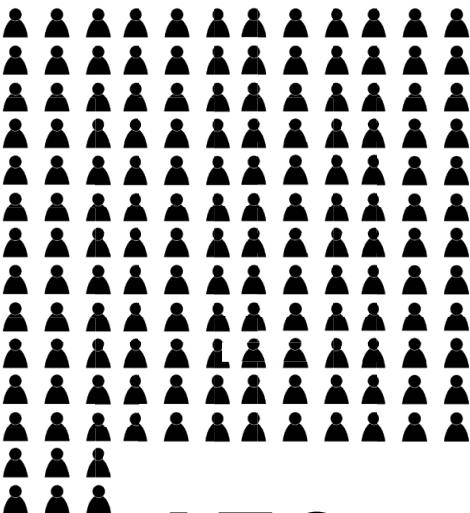




People engaged so far

To date there have been around **150** people engaged via the 4 workshops held in March and April.

93 have people completed the online survey giving a sum total of **243** representations so far.



A VISION FOR TODMORDEN



Town Councillors attended a Visioning Session aimed at developing a shared vision for the Todmorden Neighbourhood Plan.

The outcome of the workshop was a set of statements and principles which will guide the development of the Neighbourhood Plan and its content. The vision encapsulates the aspirations of what Todmorden could be like in 15-20 years, the length of the plan period.

ISSUES, BARRIERS & CHALLENGES WORKSHOP



A workshop was held with members of the local community discussing accessibility, inclusivity and independent living in Todmorden. It was agreed that planning for an accessible and inclusive town should not be an add-on but should be firmly ingrained throughout the whole Neighbourhood Plan forming an essential strand.

Small scale interventions can have a positive impact on people's lives in Todmorden and accessibility and inclusivity will be a key consideration in any new development.

Todmorden Neighbourhood Plan

2.3

Thematic workshops Jan and Feb 2017

Workshop Summary

28.1.2017 (Development Sites)
11.2.2017 (Housing)
25.2.2017 (Infrastructure)

This report summarises the findings from the 3 workshops held throughout January and February. The purpose of these workshops was to gain a deeper understanding of the views, needs and aspirations of local people in order to progress the Neighbourhood Plan appropriately.

In total there were around 170 representations at the workshops. This figure was calculated using the sign-in sheets, which have been collated providing us with a list of local people that wish to be kept informed during the process. (List will be sent to Town Clerk)

Workshop 1 focussed on 3 specific sites (Rose St, Victoria Rd & Tod College) with the aim of engaging local people to establish how they would like to see these sites developed in the near future. The next step from this is to produce concept statements and example proposals for each site.



Rose St

In summary, common themes arising from this workshop include the desired retention of green and open public space which supports food growing, spaces to socialise and community event space. The development of small-scale commercial premises with residential properties above and the straw-bale hotel proposal gained broad support with people recognising the positive economic impact it would have. People are keen to see the site visually enhanced, its relationship with and impact on the market being a key consideration. Many feel this site should aspire to become the focal point of the town.

2.3

Thematic workshops Jan and Feb 2017

Below is a list of comments received:

- Promote flexible use of site as its not always needed for parking
- Encourage future use as a community event space
- Retain use as a green, open and public space
- Some levels of parking essential to support use of markets especially for less mobile residents and storeholders
 - Explore possibilities of resurfacing site with sustainable urban drainage systems that would allow parking but also be green and allow water to permeate surface
 - Design of new development should be sustainable and low-carbon
 - Protect part of the site for community uses and events
 - Retain aspect of greenery and food-growing
 - Should positively improve the site's relationship with the market
 - Design of new development should be sensitive to local area and heritage and reflect local architecture using local materials
 - Proposals for the straw bale hotel were broadly well-received and positive predicted outcomes include support for local tourism and a 24 hour presence to reduce impact of anti-social behaviour
 - Spaces for eating, meeting and socialising should be included with seating and other street furniture
 - Raised seating could be included to maximise views of river
 - Well placed for mixed use scheme with residential flats, perhaps over commercial premises
 - Should include sheltered area to encourage socialisation
 - An open space for performances or entertainment with staging could be included
 - Water feature or a fountain should be placed on site to create a focal point
 - Outdoor facing cafe would work well with al fresco style seating
 - The square should act as a focal point of the town
 - A large part of the site should be pedestrianised
 - New development should include uses for the wider community
 - Upsidedown developments or building on stilts would mitigate potential damage from flooding
 - Should contain adequate cycle storage
 - Other commercial uses mentioned include small workshops, artisan / craft stores and shops

2.3

Thematic workshops Jan and Feb 2017

Example visions



2.3

Thematic workshops Jan and Feb 2017

Victoria Rd - Adamroyd Mill

To summarise, local people wish to see the Victoria Road site developed as a modern housing scheme which provides high quality homes to a broad section of the community. There is a general consensus to develop a scheme which supports different house types and tenures to create a genuinely mixed community. Key considerations include adequate parking provision, flood mitigation, green spaces/gardens, shared/community facilities, affordability, accessibility and environmental sustainability at its heart.

Below is a list of comments received:

- The representations encourage a mix of housing types and tenures
- Site could include low cost housing, affordable rented housing, starter homes, accessible homes and some supported housing
- New development should follow the historic urban grain of the area
- Gardens and green shared spaces should be included
- Food growing sites are encouraged
- Communal / shared facilities such as workspaces or a workshop
- A creative space for artists / musicians to work / practice is encouraged
- Multi-functional space with housing and creative industry uses
- Should be primarily smaller houses (1,2,3 bed)
- Parking provision should be included on site, ideally on ground floor
- The site should be an innovative mixed use scheme with flexible employment space and a variety of housing options such. E.G micro-business, co-working, incubators or studio space with affordable, social and accessible housing
- Create a neighbourly scheme with an emphasis on social interaction and communal activities
- Lots of planting and greenery should be included
- Low-carbon and sustainability should be a primary consideration
- Natural materials should be promoted in any new development
- Renewable energy initiatives should be supported on site
- The design of the new development should reference the local vernacular but using modern methods and technologies
- Solar panels and small turbines are essential

2.3

Thematic workshops Jan and Feb 2017

- Raised / upsidedown housing could be used to reduce flood risk
- Flood resilience is a key factor in any new development, especially housing
- Tenants and residents facilities should be included, eg - social room
- Site could include an attenuation pond at southern point to aid rainwater run off
- New development should have similar scale and massing as the mill

Example visions



2.3

Thematic workshops Jan and Feb 2017

Todmorden College

Proposals for the College site have been progressed by the group SOCIT A business plan has been produced that would see the college retained and used to provide teaching and learning opportunities around food and sustainable construction. SOCIT are aiming to have the college listed as an asset of community value. This project will now run separate to the NIDP process.

Workshop 2 concentrated on housing in Todmorden. The aims of the session were to gain a greater understanding of: Potential future housing sites, Issues with sites currently proposed, Specific housing requirements, Design aspirations and gauging local housing need.

The desired outcome of this workshop is to progress towards developing a set of house typologies specific to Todmorden which addresses the issues which have arisen throughout our engagement process. This includes but is not limited to flood resilient housing, lifetime homes, accessible homes and new forms of housing.



Oldroyd Site

There was much opposition to the development of this site for numerous reasons. Key arguments against development include the inherent flood risk, concerns over present wildlife (newts & otters), the detrimental impact on the Grade II listed Old Gate House, accessibility issues regarding the narrow access roads and the suitability of listed bridge, the potential loss of well-used footpaths, dangers of urban sprawl, poor surface conditions, the history of landslips and finally the proximity to conservation areas and special sites of scientific interest.

2.3

Thematic workshops Jan and Feb 2017

General comments on existing housing

- Many residents that suffer mobility issues are living in accommodation that is unsuitable due to narrow and steep stairs which prohibit the installation of stairlifts.
- Several representations have mentioned their homes lack space for basic amenities such as fridge/freezer, dishwasher, washing machine etc.

Comments on housing needs

- Stronger design guidance is needed to bring forward sites in flood risk areas.
- Focus should be on redesigning derelict buildings such as mills for new housing.
- New housing sites should be located within walking distance of facilities
- More housing in town for older people would also contribute to higher footfall in town centre
- There should be areas designated for self-build, custom-build and co-housing
- Greater need for starter homes, affordable homes and lifetime homes.
- Urgent need for 2 bed flats, ideally around town centre
- Houses with parking spaces and access to gardens/patios
- Housing developments should focus on creating a mix of housing opportunities
- More single level accommodation is needed to support an older and ageing local population
- More rented accommodation is needed for single people
- Hostel style accommodation would enable young people to move out and live independently
- Housing for people with dementia needs to be appropriately designed with support from carers
- Specialist housing projects which could support minority groups such as over 50 lesbians
- Advice and guidance on retrofitting old houses and the conversion of old mills etc

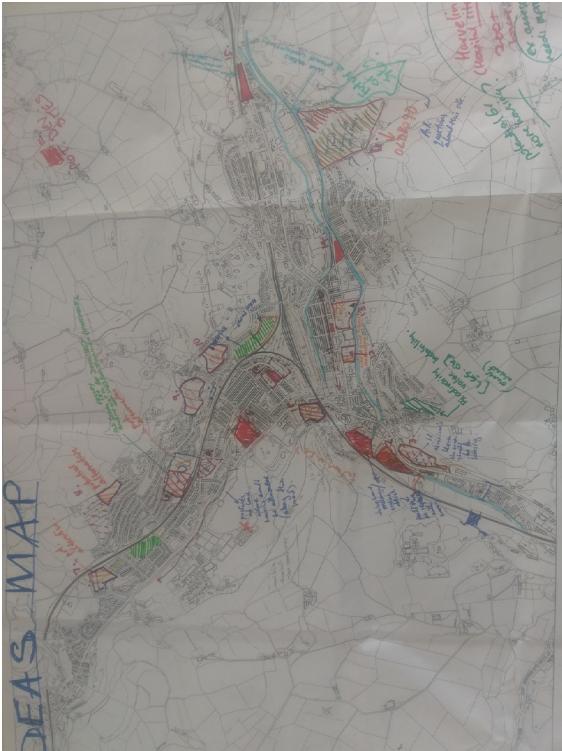
Potential Housing sites identified

- Cinderhill Mill
- Crabtree Mill (Burnley Road)
- Aldi site
- Halifax Road - various small sites
- Woodhouse Road
- Ferney Lee school
- Ferney Lee OAP home
- Adamroyd (Victoria Rd)
- Harvelin Park
- Rose St
- Hall St Telephone exchange
- Salford Way
- Morrisons (if they move)
- Lidl site (if they move)
- Crescent St

2.3

Thematic workshops Jan and Feb 2017

Potential housing sites mapped



Workshop 3 - Infrastructure

This section provides a summary of comments received relating to wider infrastructure needs of Todmorden. The purpose of this session was to understand the wider infrastructure needs which are wide-ranging and inter-related to many of the issues contained in the NP.

- Broadband and wifi connectivity
 - CCTV is needed at the bus station
 - More amenities for young people
 - Charging points for electric vehicles
 - Variety of urban furniture to support different needs (mobility/dementia)
 - Public spaces to encourage socialisation
 - Support for projects such as men in sheds
 - Community centre is really needed
 - Better publicising and marketing of existing events
 - Exercise facilities for all abilities
 - Free parking would encourage more shoppers
 - The current library could be a good place for a community centre
 - More clubs and activities are needed for over 50s in the evening and weekends
 - Parking provision at Walsden and Tod train stations is very poor
 - High-tech co-working / incubator hub with meeting rooms and work space to meet the needs of growing self-employment and entrepreneurs
 - Computer lessons are needed
 - A homeless shelter would be a good idea
 - Sites for travellers with suitable facilities
 - Training and education facilities to support adult learning
 - Joined up volunteer opportunities (not always around food)
 - Craft spaces and workshops

2.3

Thematic workshops Jan and Feb 2017

Emerging Neighbourhood Plan Policies

This section of the summary contains broad policies which have emerged from the engagement carried out to date.

1. "Watermark" scheme - £ developer contributions from all/some developments via Section 106
2. Design Reviews for larger/complex schemes
3. Policy for development to comply with Design Guidance
4. SUDS / flood mitigation / resilience
5. Food related policies [Housing, gardens, allotments, commercial]
6. Health and wellbeing - Dementia friendly policy
7. Retaining people for employment and businesses
8. Encourage / facilitate walking and cycling
9. Retain / provide new community/ educational / sustainable facilities [link to food policy and energy]
10. Renewable energy policy
11. We can be flexible in our principles and not be too prescriptive in our spatial ambitions

NP Principles

- Equity
- Inclusive
- Self-sustaining
- Locally resilient
- Working with the environment not against it
- Food security
- New jobs
- Young people
- Ecological

Parallel Prospectus

1. Community Land Trusts
2. Apprenticeships
3. Retaining local young people
4. Broadband connectivity and wifi to support self-employed and entrepreneurs
5. Skills and learning

Design Guidance / Design code

1. Support for new and renewable technologies and innovation in design, technology, infrastructure [pre-fabricated, self-build, natural materials -lime and clay]
2. Dementia friendly design (in buildings and public realm)
3. Landscaping (hard and soft) and planting
4. Shop front design guidance

2.4

Responses from statutory consultees



United Utilities Water Limited
Grasmere House
Lingley Mere Business Park
Great Sankey
Warrington WA5 3LP

unitedutilities.com

Planning.Liaison@uuplc.co.uk

By email only: spatial.planning@calderdale.gov.uk
projectmanager@todmorden-tc.gov.uk

Your ref:

Our ref:

Date: 02-NOV-23

Dear Sir / Madam

TODMORDEN NEIGHBOURHOOD DEVELOPMENT PLAN – REGULATION 14 CONSULTATION

Thank you for your consultation seeking the views of United Utilities as part of the preparation of the Neighbourhood Development Plan (NDP) for Todmorden. United Utilities wishes to build a strong partnership with neighbourhood groups to aid sustainable development and growth.

Todmorden is an area that borders the area of service of United Utilities. Much of the area is served by an alternative provider of water and wastewater services. That said, we do have assets and land within the Neighbourhood Area. Notably these assets include water supply assets and land owned by United Utilities including reservoirs and land used for the purposes of public water supply catchment. As such, it is important that we are kept up to date on the preparation of a new neighbourhood development plan (NDP). Our assets will need to be fully considered in any future proposals for development or use of land especially where this is on, or within close proximity to, our assets. It is important to note that we will not permit development over or in close proximity to our assets. All of our assets will need to be afforded due regard in the planning and development process. This should include careful consideration of development and landscaping proposals in the vicinity of our assets and any changes in levels of land over our assets.

In the preparation of the new NDP, we would wish to engage with you on any potential new allocations. We strongly recommend that future applicants / promoters fully understand site constraints as soon as possible, ideally before any land transaction is negotiated and before commencing design work, so that the implications of our assets on development can be fully understood. Where our assets exist on a site, we ask applicants / developers to contact United Utilities to understand any implications. If considering future allocations or development proposals, we would request that contact is made with United Utilities to discuss the detail of the proposals at an early stage so that any potential issues can be explored and fully understood.

We encourage you to direct future developers to our [free pre-application service](#) to discuss their schemes and highlight any potential issues by contacting:

Developer Services – Water

United Utilities Water Limited
Registered in England & Wales No. 2366978 Registered Office: Haweswater House, Lingley Mere Business Park, Lingley Green Avenue, Great Sankey, Warrington, WA5 3LP

Responses from statutory consultees

Tel: 0345 072 6067
 Email: DeveloperServicesWater@uuplc.co.uk

Water Catchment Land

United Utilities wishes to note that large parts of the Neighbourhood Area in the hills above Todmorden are public water supply catchment land. This is land which feeds reservoirs that are critical to public water supply resources. Development proposals on water catchment land can have an impact on water supply resources and therefore we recommend that you include a policy which identifies the need to engage with the statutory undertaker for water to determine whether any proposal is on land used for public water supply catchment purposes. Please get in touch for information on the location of catchment land in the Neighbourhood Area.

In cases of wind energy proposals on water catchment land, the applicant should seek to locate development so that the impact on public water supply is minimised through the location of the development and through the undertaking of appropriate risk assessments and inclusion of mitigation measures in the design and construction process. It is particularly important to avoid the location of new wind turbines on deep peat land.

We recommend you include the following policy relating to water catchment land in your new NDP.

Development proposals on land used for public water supply catchment purposes will be required to consult with the relevant water undertaker. The first preference will be for proposals to be located away from land used for public water supply purposes. Where proposals are proposed on catchment land used for public water supply, careful consideration must be given to the location of the proposed development and a risk assessment of the impact on public water supply may be required with the identification and implementation of any required mitigation measures.

Water Efficiency Measures

A number of properties within Walsden are served by a public water supply provided by United Utilities. As a result, we recommend that Policy H.6 Sustainable Homes is amended to state:

Residential developments are encouraged to meet the highest standards of energy and water efficiency and sustainable construction including the use of on-site renewable energy provision.

A tighter water efficiency standard in new development has multiple benefits including a reduction in water and energy use, as well as helping to reduce customer bills. Water efficiency is therefore a key component of any response to the climate emergency and our journey to net zero.

Summary

If you have any queries or would like to discuss this representation, please do not hesitate to contact me.

Yours faithfully

Andrew Leyssens
 Planning, Landscape and Ecology
 United Utilities Water Limited



Date: 03 November 2023
 Our ref: 45065
 Your ref: Todmorden Neighbourhood Plan

Mr Colin Hill
 Todmorden Town Council

BY EMAIL ONLY
projectmanager@todmorden-tc.gov.uk

Dear Mr Hill

Todmorden Neighbourhood Plan – Regulation 14 Consultation

Thank you for your consultation on the above dated 31 August 2023.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in Natural England's Standing Advice on protected species.

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission standing advice.

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely
 Sally Wintle
 Consultations Team

2.4

Responses from statutory consultees

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic¹](http://magic.defra.gov.uk/) website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification**, **Ancient Woodland**, **Areas of Outstanding Natural Beauty**, **Local Nature Reserves**, **National Parks (England)**, **National Trails**, **Priority Habitat Inventory**, **public rights of way (on the Ordnance Survey base map)** and **Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](http://theAssociationofLocalEnvironmentalRecordsCentres.org).

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here²](#). Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here³](#).

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic⁴](http://Magic4.org) website and also from the [LandIS Website⁵](http://LandISWebsite5.org), which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework⁶](http://NationalPlanningPolicyFramework.gov.uk) sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance⁷](http://PlanningPracticeGuidance.gov.uk) sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

¹ <http://magic.defra.gov.uk/>

² <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

³ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁴ <http://magic.defra.gov.uk/>

⁵ <http://www.landis.org.uk/index.cfm>

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Responses from statutory consultees

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here⁸](#)), such as Sites of Special Scientific Interest or [Ancient woodland⁹](#). If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here¹⁰](#)) or protected species. To help you do this, Natural England has produced advice [here¹¹](#) to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land¹²](#).

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

[Defra's Biodiversity Metric](#) should be used to understand the baseline biodiversity value of proposed development sites and may be used to calculate biodiversity losses and gains where detailed site development proposals are known. For small development sites the [Small Sites Metric](#) may be used. This is a simplified version of [Defra's Biodiversity Metric](#) and is designed for use where certain criteria are met. Where on site measures for biodiversity net gain are not possible, you should consider off site measures.

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance¹³](#)).

⁸ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹⁰ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

¹¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹² <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

¹³ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

2.4

Responses from statutory consultees

- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside [Defra's Biodiversity Metric](#) and is available as a beta test version.



Mr. Colin Hill,
Project Manager
Todmorden Town Council,
Todmorden Town Hall,
Bridge Street,
Todmorden,
OL14 5AQ

Our ref: PL00793901
Your ref:
Telephone 01904 601 879
Mobile 0755 719 0988

23rd October 2023

Dear Mr. Hill,

Todmorden Neighbourhood Development Plan

Regulation 14 Pre-submission Response

Thank you for consulting Historic England about the Pre-submission Draft of the Todmorden Neighbourhood Development Plan.

Todmorden Parish is located 15.8 km/9.8 miles west of Halifax and is situated on the River Calder. We note that the Parish contains 2 Grade I, 13 Grade II* & 323 Grade II Listed Buildings, 2 Scheduled Monuments, and 2 Conservation Areas. It also contains a number of buildings, structures, places and sites of local historic interest, which you can identify in the Draft Plan and incorporate policies designed to protect these sites and their settings.

We consider that both documents are of a reasonably comprehensive standard but would draw your attention following detailed comments upon the draft Neighbourhood Plan and Design Guide and to the general advice, below.

Neighbourhood Plan

Listed Buildings

Given the number of Listed Buildings in the Parish, it would be appropriate to include a more detailed narrative, recognising their important contribution to the character of Todmorden Parish, together with appropriate policies and cross references to the Design Guide (see below).

Conservation Areas

Both the Todmorden and Lumbutts & Mankinholes Conservation Area Appraisals (CAAs) are dated 2008 and the settlements are likely to have undergone considerable change in the intervening period. It would be appropriate to review both CAAs and incorporate the conclusions of these reviews, including changes to the boundary, assessments of both areas, new policies and recommendations to Calderdale Council into the Neighbourhood Plan.

Responses from statutory consultees

Scheduled Monuments & Archaeology

The Neighbourhood Plan makes no mention whatsoever of Scheduled Monuments & Archaeology. This omission should be addressed, with the help of West Yorkshire Archaeology Advisory Service and an appropriate narrative and policies included in the documents.

Non-designated Heritage Assets

Policy HG.1, pg. 69, para. 2 refers to “Guidance provided from English Heritage . . . English Heritage do not provide guidance on the identification of non-designated heritage assets. Historic England’s Advice Note 7, “[Local Heritage Listing: Identifying and Conserving Local Heritage](#)” (27th January 2021) provides the appropriate guidance and should be cited if the heritage assets identified in HG.1 comply with the recommended criteria.

We would also point out that non-designated heritage assets are not confined to buildings alone; parks & cemeteries, monuments & memorials, bridges & locks, water courses & open water, archaeological sites and elements of the wider rural landscape can also fall into this category, and should be included in the Schedule and Map , with appropriate additional narrative and policies.

Views & Vistas

Given the Calder Valley’s topography para. 1.2.18 acknowledgement of the importance of “views of the Pennine landscape” is welcome. However, the document does not follow through by identifying key views and vistas and incorporating narrative, images, maps and policies as appropriate. We suggest that this omission be addressed.

Design Guide

Listed Buildings

Listed buildings are only mentioned once in the Design Guide and given the much of the document is devoted to making recommendations on alterations, we would strongly suggest that a Listed Buildings section is included in the document, advising owners of listed buildings to consult Calderdale Council’s Conservation Team and/or an accredited heritage consultant before considering making any alterations.

The Retrofit House

The Retrofit House illustration (pg.44) focusses understandably on flood prevention, but a key part of retrofitting historic buildings is ensuring such buildings have good thermal insulation. The illustration unfortunately shows a building with a cavity wall and a solid concrete floor, which were construction techniques which only became common in the early to mid-twentieth century in domestic properties.

As the majority of the Parish’s domestic building stock is likely to pre-date these developments, a new illustration, relating to solid walled, or rubble filled wall construction with timber floors should be added, illustrating internal and external insulation and flood prevention/water proofing options.

General Advice

Historic England provides comprehensive guidance on its [Neighbourhood Planning webpage](#), as well as publishing Historic England Guidance Note 11, [Neighbourhood Planning and the Historic Environment](#). You may also wish to view our [Neighbourhood Planning webinar](#).

Responses from statutory consultees

We consider that the planning and conservation staff at Calderdale Council are best placed to assist you in the development of your Neighbourhood Plan and, in particular, how the strategy might address the area's heritage assets. Consequently, we do not consider that there is a need for Historic England to be involved in the further development of your plan, particularly given its reasonably comprehensive nature.

If you have not already done so, we would recommend that you speak to the staffs at the [West Yorkshire Archaeological Advisory Service](#) who look after the West Yorkshire Historic Environment Record/Sites and Monuments Record. They should be able to provide details of not only any designated heritage assets but also locally-important buildings, archaeological remains and landscapes.

Some Historic Environment Records may also be available on-line via the Heritage Gateway (www.heritagegateway.org.uk). It may also be useful to involve local voluntary groups such as the local Civic Society or local historic groups in the production of your Neighbourhood Plan.

If you have any queries about any of the matters raised above or would like to discuss anything further, please do not hesitate to contact us.
Yours sincerely,



Craig Broadwith
Historic Places Adviser
Email: Craig.Broadwith@HistoricEngland.org.uk

2.5 Letter to property owners of proposed non-designated heritage assets

TODMORDEN TOWN COUNCIL

Todmorden Town Hall,
Bridge Street, Todmorden,
OL14 5AQ
www.todmorden-tc.gov.uk

August 2023

The Property Owner/Occupier

Dear Property Owner/Occupier

As you might know, Todmorden Town Council is in the course of preparing a Neighbourhood Plan. The draft plan will shortly go out for consultation. As part of this, Todmorden Town Council wants to recognise and celebrate the historical buildings in Todmorden.

Todmorden has a rich mix of Grade 1 and 2 listed buildings which are protected by local and national policies. In addition, Todmorden has many other special heritage buildings that make a positive contribution to Todmorden's heritage but aren't listed. They might be quite rare; or make a particular historic, cultural or social contribution to the town; or they might be of high architectural quality.

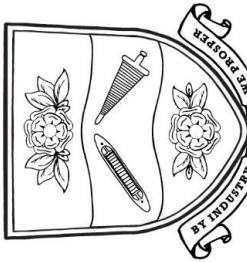
We are writing to you because we feel your property is one of these special buildings. We call these Non-Designated Heritage Assets (NDHA) and we include a list of them in the Todmorden Local Plan. We would like to include your property in this list.

What does this mean for you?

Firstly, it's a way of recognising the historic significance of your building.

Secondly, and really importantly, as owners of your property you may already have something called 'permitted development rights'. This means that you can make some changes to your property which do not require planning permission. These rights will not be affected in any way if your property is included in the list of Non-Designated Heritage Assets.

Thirdly, we'd love to hear more about the history of your property. If you have stories or photos or any other information about your property, we'd love to learn more. You can email these to us.



2.5 Letter to property owners of proposed non-designated heritage assets

What next?

So that we can retain the historical character of Todmorden for present and future generations, I hope you will allow Todmorden Town Council to include your property in the list of special buildings within the Neighbourhood Plan (the Non-Designated Heritage Assets list).

But if for any reason you do not wish for your property to be included, please let us know and it will be removed. Simply write to us at the address above, either by letter or email to projectmanager@todmorden-tc.gov.uk

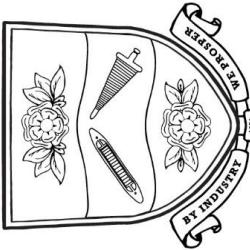
Yours sincerely



Cllr S Martin
Chair of Development Committee

Please see Appendix 1 for more information

2.6 Letter to landowners of proposed LGS



TODMORDEN TOWN COUNCIL

Todmorden Town Hall,
Bridge Street, Todmorden,
OL14 5AQ
www.todmorden-tc.gov.uk

Ronan Carnally
Planning Officer
Spatial Planning Team
Calderdale MBC
Halifax Town Hall,
Crossley Street
Halifax
HX1 1UJ

Dear Ronan

Todmorden Neighbourhood Plan 2023-2032- Designated Local Green Spaces

As you may know, Todmorden Town Council is working on producing a Neighbourhood Plan. This is a land-use planning document that helps to shape and influence development in the Todmorden until 2032.

Local Green Spaces are designated sites that are protected from development due to the contribution they make to the local area in terms of amenity, leisure and recreational opportunities, and where applicable wildlife or biodiversity opportunities.

We are contacting you as a representative of the landowner to advise you that the following green space(s)

1628PAP1 Adelaide Street Land
2473PAP1 Rose Street Land
1985PAP1 Brown Birks Street Land
1931PAP1 Coal Clough Road (Pitts Estate) Allotments
2106PAP1 Centre Vale Parkland
1870PAP2 Scott Street Recreation Ground (Recreation)
Meadow Bottom Play Area
Denis's Field off Woodhouse Avenue

are proposed to be designated as a local green spaces, and therefore protected from future development:

Whilst these sites are protected from development, development will be considered if: -

- The land becomes surplus to requirements.
- The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quality and quantity in a suitable location.
- The development is for alternative sports and recreation provision, the benefits of which clearly outweigh the loss of the current or former use.

2.6 Letter to landowners of proposed LGS

There is specific criteria for designating sites so not all green spaces will be suitable for Local Green Space listing, with the designation only used where:-

- the green space is in reasonably close proximity to the community it serves;
- the green area is 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;
- the green area concerned is local in character and is not an extensive tract of land

Full Local Green Space (LGS) assessments have been undertaken and are included in the appendix to the plan. Sites which have been filtered out are also included in the appendix.

If you have any questions about any aspects of this work, please do not hesitate to contact our project Manager, Colin Hill at projectmanager@todmorden-tc.gov.uk or 077063322037

Yours Sincerely

Naomi Crewe

Town Clerk

Web site : Final-Draft-TOD-NP-For-Consultation-Single-Pages-V2.pdf (todmorden-tc.gov.uk)

Note that separate letters were sent to all landowners of all proposed LGS.

For the purposes of this document only this letter has been included as an example.