



**Canal &  
River Trust**

Making life better by water

Calderdale Metropolitan Borough Council  
Planning Services  
Northgate House  
Halifax  
West Yorkshire  
HX1 1UN

**Our Ref** CRTR-POL-2022-35239

**Thursday 24 March 2022**

**Dear Sir/Madam**

**Proposal: Park Ward Neighbourhood Plan Consultation**

Thank you for your consultation.

I am writing to confirm that the Trust does not hold any assets within the Neighbourhood Plan Area and as such we have no comment to make at this stage.

Please do not hesitate to contact me with any queries you may have.

Yours faithfully,

**Gavin Rutter**

Planning Assistant

Gavin.Rutter@canalrivertrust.org.uk

<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>

**Canal & River Trust**

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## Ronan Carnally

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**From:** David Greenfield  
**Sent:** 23 February 2022 16:13  
**To:** Spatial Planning  
**Cc:** Adele Blacklock; Andrea Martinovic; Fern Petrovic; Rachael Mitchell; Rachel Squire; Stephanie Furness; Taylor Michelle Stead; Thomas Paling  
**Subject:** Park Ward Draft Neighbourhood Plan Comments on behalf of Housing Strategy and Growth Team Calderdale Council

Good Afternoon,

The publication of a draft Neighbourhood Plan for the Park Ward of Halifax is welcomed . The draft plan identifies, as key housing issues, amongst other things, shortages of affordable family housing, poor quality of the existing stock, overcrowding and the existence of derelict sites and homes. It sets a target for new homes in the Local Plan period of 350 dwellings. The objectives and policies therefore support appropriate new housing development and extensions (4.24) . Policies to achieve this are:

- PW1 Key Derelict Sites; identifies 8 derelict sites where development will be encouraged and supported
- PW2 Sets a minimum net housing density of 45 dwellings per hectare
- PW3 Sets out requirements for the design of new housing
- PW10 Supports residential use above commercial premises.

These policies are to be supported as making the best use of land in a densely developed area to meet the identified housing needs. However:

- The 350 new dwellings target is based on a 2015 housing needs study. Although this is comprehensive, many indicators are likely to have changes over the last seven years, including household projections, house prices and the housing targets in the Local Plan. The housing target, policies and need for affordable housing would be better supported by an up to date assessment which could also cover the need for specialist homes and adaptations , for example for the elderly and the disabled.
- An up to date housing needs study could also more accurately identify the type and size of new homes required to meet local needs . This would assist the Council to make the case for suitable housing and developers meet local need.
- The plan could do more to identify and support the need for affordable housing, although it is noted that the proportion of 20% in the Local Plan is described as a starting point for negotiations. This would help the Council make the case for new affordable housing in private development and development by housing associations.
- Policy PW1. Although it is appreciated that the plan needs to be flexible to encourage reuse, it is missing an opportunity to set out detailed proposals for some of the derelict sites, including their use for new housing.

I hope you find these comments of assistance

David Greenfield  
Housing Strategy Manager  
Calderdale Council  
Regeneration & Strategy  
Housing Strategy and Growth Team

07970 752866

Working from Home until further notice



The Coal  
Authority

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T: 01623 637119

E: [planningconsultation@coal.gov.uk](mailto:planningconsultation@coal.gov.uk)

Spatial Planning Team  
Calderdale Metropolitan Borough Council

BY EMAIL: [spatial.planning@calderdale.gov.uk](mailto:spatial.planning@calderdale.gov.uk)

22<sup>nd</sup> March 2022

Dear Spatial Planning Team

### **Re: Park Ward - Neighbourhood Plan**

Thank you for your notification received on the 9<sup>th</sup> February 2022 in respect of the above consultation.

The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy & Industrial Strategy. As a statutory consultee, The Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

Our records indicate that within the Park Ward Neighbourhood Plan area, as defined, there is a single mine entry. This feature and its resultant zone of influence pose a potential risk to surface stability and public safety.

The Coal Authority is of the opinion that building over the top of, or in close proximity to, mine entries should be avoided wherever possible, even after they have been capped, in line with our adopted policy:

<https://www.gov.uk/government/publications/building-on-or-within-the-influencing-distance-of-mine-entries>

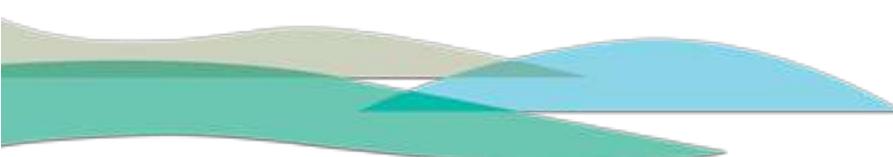
Having reviewed the Neighbourhood Plan it is noted that it does not propose to allocate any sites for future development. On this basis I can confirm that the Planning team at the Coal Authority have no specific comments to make on this document.

Please do not hesitate to contact me should you wish to discuss this further.

Yours faithfully



**Melanie Lindsley** *BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI*  
**Development Team Leader (Planning)**



**Making a better future for people  
and the environment in mining areas**



Historic England

YORKSHIRE

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Planning,  
Calderdale Council,  
Mulcture House,  
HALIFAX,  
HX1 1PS

Our ref: PL00569685  
Your ref:  
Telephone 01904 601 879  
Mobile 0755 719 0988

21<sup>st</sup> March 2022

Dear Sir or Madam,

**Park Ward Neighbourhood Development Plan for Park Ward Neighbourhood Forum  
Regulation 16, Neighbourhood Planning (General) Regulations 2012  
Neighbourhood Plan Submission Consultation**

Thank you for consulting Historic England on the Submission Draft of the Park Ward Neighbourhood Plan.

We wrote to Park Ward Neighbourhood **Forum** on 7<sup>th</sup> May 2019, explaining that we did not wish to comment on detail upon their Pre-submission Draft Neighbourhood Plan.

We have considered the Submission Draft and do not wish to comment further on the proposed Neighbourhood Plan. We look forward to being notified of the Making of the Neighbourhood Plan, following the Examination and Referendum.

Yours sincerely



Craig Broadwith  
Historic Places Adviser  
E-mail: [Craig.Broadwith@HistoricEngland.org.uk](mailto:Craig.Broadwith@HistoricEngland.org.uk)



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Our Ref: MV/ 15B901605



15 February 2022

[spatial.planning@calderdale.gov.uk](mailto:spatial.planning@calderdale.gov.uk)

via email only

Dear Sir / Madam

**Park Ward Neighbourhood Plan Regulation 16 Consultation  
February-March 2022  
Representations on behalf of National Grid**

National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

**About National Grid**

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

**Proposed development sites crossed or in close proximity to National Grid assets:**

An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.

National Grid has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

National Grid provides information in relation to its assets at the website below.

- [www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/](http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/)

Please also see attached information outlining guidance on development close to National Grid infrastructure.

**Distribution Networks**

Information regarding the electricity distribution network is available at the website below:  
[www.energynetworks.org.uk](http://www.energynetworks.org.uk)

Information regarding the gas distribution network is available by contacting:  
[plantprotection@cadentgas.com](mailto:plantprotection@cadentgas.com)

**Further Advice**

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

**Matt Verlander, Director**

[nationalgrid.uk@avisonyoung.com](mailto:nationalgrid.uk@avisonyoung.com)

Avison Young  
Central Square South  
Orchard Street  
Newcastle upon Tyne  
NE1 3AZ

**Spencer Jefferies, Town Planner**

[box.landandacquisitions@nationalgrid.com](mailto:box.landandacquisitions@nationalgrid.com)

National Grid  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



**Matt Verlander MRTPI**  
**Director**  
**0191 269 0094**  
**[matt.verlander@avisonyoung.com](mailto:matt.verlander@avisonyoung.com)**  
**For and on behalf of Avison Young**

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

#### Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's '*Guidelines for Development near pylons and high voltage overhead power lines*' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their '*Guidelines when working near National Grid Electricity Transmission assets*', which can be downloaded here: [www.nationalgridet.com/network-and-assets/working-near-our-assets](http://www.nationalgridet.com/network-and-assets/working-near-our-assets)

#### Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's '*Guidelines when working near National Grid Gas assets*' can be downloaded here: [www.nationalgridgas.com/land-and-assets/working-near-our-assets](http://www.nationalgridgas.com/land-and-assets/working-near-our-assets)

#### How to contact National Grid

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: [nationalgrid.uk@avisonyoung.com](mailto:nationalgrid.uk@avisonyoung.com)

Date: 28 March 2022  
Our ref: 384077



Spatial Planning Team  
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Crewe Business Park  
Electra Way  
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CW1 6GJ

**BY EMAIL ONLY**

T 0300 060 3900

Dear Spatial Planning Team

**Click here to enter title.**

Thank you for your consultation on the above dated 09 February 2022

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.

For any further consultations on your plan, please contact: [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours faithfully

Merlin Ash  
Yorkshire and Northern Lincolnshire Area Team  
Natural England

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

## Natural environment information sources

The [Magic](#)<sup>1</sup> 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 [here](#)<sup>2</sup>.

**Priority habitats** are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)<sup>3</sup>. 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 [here](#)<sup>4</sup>.

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 [Magic](#)<sup>5</sup> website and also from the [LandIS website](#)<sup>6</sup>, which contains more information about obtaining soil data.

## Natural environment issues to consider

The [National Planning Policy Framework](#)<sup>7</sup> sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)<sup>8</sup> 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.**

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<sup>1</sup> <http://magic.defra.gov.uk/>

<sup>2</sup> <http://www.nbn-nfbr.org.uk/nfbr.php>

<sup>3</sup> <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

<sup>4</sup> <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

<sup>5</sup> <http://magic.defra.gov.uk/>

<sup>6</sup> <http://www.landis.org.uk/index.cfm>

<sup>7</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/807247/NPPF\\_Feb\\_2019\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/807247/NPPF_Feb_2019_revised.pdf)

<sup>8</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

## 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.

## Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)<sup>9</sup>), such as Sites of Special Scientific Interest or [Ancient woodland](#)<sup>10</sup>. 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 [here](#)<sup>11</sup>) or protected species. To help you do this, Natural England has produced advice [here](#)<sup>12</sup> 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 171. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)<sup>13</sup>.

## **Improving your natural environment**

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, 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. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- 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 encourage wildlife.
- Adding a green roof to new buildings.

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<sup>9</sup><http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

<sup>10</sup> <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

<sup>11</sup> <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

<sup>12</sup> <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

<sup>13</sup> <http://publications.naturalengland.org.uk/publication/35012>

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.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#) <sup>14</sup>).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, 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).

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<sup>14</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>

## Ronan Carnally

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**From:** Janet Belfield <Janet.Belfield@sportengland.org>  
**Sent:** 10 March 2022 14:26  
**To:** Spatial Planning  
**Subject:** RE: Park Ward Neighbourhood Plan Consultation (Calderdale MBC)

**CAUTION:** This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Spatial Planning Team,  
Sport England acknowledges that the Neighbourhood Plan does not designate any playing fields as local green spaces and does not allocate any playing field land for development, Sport England therefore has no comments to make.

Yours sincerely,

**Janet Belfield** Principal Planning Manager – North Team **M:** 07919 044159



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)

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