

Calderdale Metropolitan Borough Council

Schedule of representations received for the Regulation 16 Consultation on the Todmorden Neighbourhood Plan

Consultee	Representation
Simon Jones (National Highways)	TNP2 Many thanks for the consultation regarding the Neighbourhood Plan consultation for Todmorden. Having reviewed the documentation via the links provided (and being mindful of the extensive Local Plan work we already undertake with the team at Calderdale), there is little formal comment to make at this point on behalf of the Secretary of State for Transport, and their primary interests. It remains that any planned development already identified in the wider LP consultations for Calderdale Council will have been accounted for between National Highways and yourselves, and that the council has our extant comments for the current LP. This will obviously extend forward to the next plan period and the work we will be undertaking together, and should also subsume all the local parish council's own aspirations (to be outlined by the neighbourhood plan documents you will receive from them). Should new developments be publicly forthcoming which sit outside of the existing LP settlement plans i.e. new housing or employment sites, we would look to review these with the Council in the usual manner, and any supporting mitigation they may require. The current consultation shows the wider aspirations of the neighbourhood plan in a positive light, and this is welcomed. The proximity of the SRN under my own jurisdiction extends from a significant distance more to the south, namely the M62 corridor. As with all development within the Council boundary, it is expected that the aggregated impact of all neighbourhood plans will link to the growing congestion and impacts on the SRN which the Council will need to continue to address in their wider IDP proposal, to ensure a sound local plan infrastructure offering. At this time therefore, I will continue my work with yourselves to identify any specific sites which may have a significant impact to the continued safe operation of the Strategic Road Network, and furthermore ensure the Council then continues to ensure financial contributions are collected from developers to provide any necessary mitigation on the SRN.

	National Highways will remain vigilant to the aggregated impact of all Local Parish Council aspirations, when determining our position on the Local Plan for Calderdale and the cyclical PINs reviews of this, now, and in the future.
West Yorkshire Police	TNP3 I have noticed an error. On page 51 there is a picture referenced LGS11 which should relate to green space on Longfield Road. It actually shows a map of Centre Vale park.
Simon Tucker (Canal & River Trust)	TNP4 <u>Section 8 - Canal & Riverside</u> Our canalside spaces offer locations for the community to relax, undertake leisure activities and to undertake active exercise. We believe our spaces can provide wellbeing benefits to local communities. The Trust are developing a framework to measure the benefits of waterways. As part of this, our 2017 nationwide Community Survey (carried out in conjunction with Kanter TNS) identified that 30% of visitors to our network do so for health/fitness reasons; and 90% of users agree that the canal is a good place to relax/de-stress. Efforts to enhance pedestrian and cycling connectivity, as stated in the policy text, could help realise these benefits to a greater extent within the district. For the above reasons, the Trust is keen to improve access to our spaces for local communities. The overall message in section 8, notably in paragraph 8.0.3, is positive, and broadly lines up with the Trust's vision and goals for our canal and canalside spaces. We wish to highlight that canals are multifunctional in nature due to the presence of towpaths and the ability to handle boat traffic, which may not be the case for river corridors. It is important that all users of the canal are taken into account as part of the planning process. In addition, our canals are supported by numerous embankments and retaining structures where protection of these assets is important to ensure that the canals can continue to function for years to come. To ensure that all users are identified and to ensure that decision makers are made aware of the need to protect canal based assets, we recommend that the introductory explanatory text within this section is expanded. An additional paragraph could be inserted to explain the nuances of canal spaces. Example text is provided below:

	<i>“The Rochdale Canal provides a location for recreational activity, through both use of its towpath and also use of the water itself by boaters and other water based leisure activities. As an artificial structure, the canal is supported by a variety of embankment and cutting structures”</i> We wish to highlight that tall fences and boundary treatments both along the canal corridor and along key access points to our network have the potential to reduce surveillance of our spaces, and can make them less attractive to users. The overarching aim of opening up areas alongside waterpaces could be made more effective if Policy CR.1 also referenced the need to avoid this. An additional paragraph within the policy text could assist. Suggested wording is provided below: <i>“Tall solid boundary treatments alongside water spaces or key access routes to such spaces should be avoided. Where effective screening is required, such as for service areas or car parks, the use of hedgerows or native planting should be considered”.</i>
Simon Tucker (Canal & River Trust)	TNP5 <u>Policy HG.2 Key Views</u> The inclusion of Key View 4 would help to retain the semi-natural outlook from the canal through this part of Todmorden. This could help re-enforce the need to retain the character and appearance of the consideration in this location. We are concerned, however, that the policy as drawn is imprecise when it comes to the location of key views. The document does not make clear whether the red arrow is meant to define the full extent of the view or is it just an indication. To add more precision, the wording of HE.2 could be amended to indicate whether the extent of the view to be protected (i.e. whether it is limited to the area shown by the arrow, or whether it is an indication). In addition, the arrows on figure 9 could be amended to show definitive ‘end points’ as to where the policy would apply. Within the wording for policy HG.2 the use of the word ‘retained’ implies that no change should be allowed. This may require reconsideration, as we understand that the overall wording of the policy would allow for some change as long as it avoids any significant impact on their visual quality and amenity.

	Key View 4 specifically addresses towpath users. However, we believe that views form the waterspace (enjoyed by boaters) should also be taken into account. To address these users, the arrow on figure 4 could be amended to make reference to the water. Alternatively, the policy text for viewpoint 4 could be amended as follows: <i>“Along the Rochdale Canal in both directions, including views from the waterspace”</i>
Graham Hale	TNP6 The whole document has not looked at the whole community in particular the disabled it only touches lightly on section 22 as a disabled person I reached out to Todmorden town council to help them cover all disabilities and not just dementia they said that Calderdale’s Own local plan covered this, some people in Todmorden don’t feel part of Calderdale this is the same for the disabled community there as no one seems to be listening to them locally instead it is left to central groups to fight their case This document does not take into account the EQ act 2010 on the protective groups instead only focusing on one group there is no mention of any thought in to Visually impaired or wheelchair/mobility scooter users. instead putting cyclist as a priority who are not part of the EQ act
Calderdale MBC	TNP8 Officers from Calderdale Council have collated the following amendments which we request the Town Council incorporates into a referendum draft of the Neighbourhood Plan: NP submission version: • The following text should be included alongside any OS-derived map in the document: “© Crown copyright and database right 2018. Ordnance Survey licence number 10023069.” • P3 – Add page numbers to list of contents • P3 – Add appendices to list of contents • P53 – New Local Wildlife Sites have been designated in Calderdale. An updated map should be obtained from WYJS. • P70 – Include a caveat somewhere stating that the NDHA list is not exhaustive. Inevitably there’ll be some buildings which aren’t on there, for example which might be otherwise inaccessible and would only come to our attention when a planning application has been submitted. Applicants/agents quite often argue when we determine that something

	is a non-designated heritage asset as part of the decision making process and it's not listed as an NDHA anywhere. • P119 – Monitoring & Delivery should be renumbered to 13.0(?) and updated on p3 Heritage register: • P3 – Update references to Local Plan policies from RCUDP policies - o HE1 Historic Environment - o BT1 High Quality Inclusive Design • P13 – Para 3.64: update the 2011 census figure to 2021 (15,794 people) SEA/HRA determination statement: • P9 – Update section 4.5 to reflect adoption of Local Plan
David Greenfield (Calderdale MBC Housing)	TNP7 Chapter 4 Housing 1.1.4 Tenure 34.8% of homes in Todmorden are owned outright. 30.2% of homes are owned with a mortgage or loan. 3.7% of homes are rented from the local authority, and 10.1% are rented from another social housing provider. 18.3% of homes in Todmorden are private rented. (Source, ONS, 2023) <u>Comment</u> The 3.7% owned by the local authority is misleading as Calderdale Council isn't a stock holding authority. <u>Housing Policies</u> H.2 HOUSING MIX All new housing schemes, within or immediately adjacent to the built-up area of Todmorden, must provide an appropriate mix of dwelling types to include particular provision for smaller households. <u>Comment</u> Policy requires a range of sizes but favours smaller homes (2 bed) based on the Todmorden Housing Needs Assessment which favoured 1 and 2 bed homes. This may not

take account of the need for larger homes to accommodate home working which is particularly common in the town. Suggest informed by current SHMA refresh being undertaken by CMBC.

Is there a need for accessible flats and bungalows suitable for families downsizing

H.4 INNOVATIVE HOUSING

Innovative forms of residential development, including community-led housing, proposals developed by Community Land Trusts, cohousing, self-build and shared equity schemes and those designed to be resilient to flooding will be supported and are encouraged.

Comments

Todmorden may be suitable for self-build project with small plots in attractive landscape. Innovative housing could potentially conflict with H3 and requirements of Environment Agency.

H.5 REUSE & CONVERSION

New residential developments that re-use and convert existing buildings is encouraged and will be supported.

These developments should provide sufficient vehicle parking to Local Authority standards within the development site wherever possible; new homes provided through conversion of existing mills and similar large buildings should incorporate basement parking wherever feasible.

Comment

Add “Local Authority Standards set out in Annex 1 of the adopted Local Plan”.

H.6 SUSTAINABLE HOMES

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 such as PV panels and air source heat pumps.

Comment

This will be determined by changes to Building Regulations as they approach Future Homes Standard. Design standards may have to be adapted to accommodate this.

H.7 INCLUSIVE & ACCESSIBLE HOMES

Residential developments that include homes that meet the enhanced accessibility and adaptability standards in the Building Regulations will be supported. These homes should be located in places close to facilities and public transport. New homes designed to meet the needs of people with dementia and other invisible disabilities are encouraged.

Comment

Policy HS4 of the Local Plan requires all homes to be built to the adaptable homes standard (M4(2)). This is likely to become national policy. This policy as worded is therefore redundant but could be adapted to emphasise the importance of building homes suitable for older people, people with physical disabilities and invisible disabilities should be suitably and located. By building to accessible home standard now and adapting to meet specific needs we can allow people to remain in their homes for longer

H.8 SUSTAINABLE DRAINAGE SYSTEMS (SuDS)

All new developments should include sustainable drainage systems (SuDS), including permeable surfaces and rainwater harvesting to help mitigate flooding and alleviate surface water runoff. All applications should demonstrate how flooding and water management will be addressed, including a summary of the proposal's impact on flooding and water in cumulation with the surrounding properties and built environment. Support is given to any application to retrofit SuDS and natural flood management to any previously permitted development. Best practice and examples are provided in the Todmorden Design Guide and should be referred to in applications.

Comment

There may not be sufficient room for a full SUDS system on all sites particularly the infill sites in Policy H1. However even smaller development can incorporate elements of SUDs such as rainwater harvesting.

H.9 COMMUNITY HOUSING Proposals for community-led housing and proposals developed by community land trusts that meet local housing needs, particularly those that provide affordable housing will be supported.

Comments

This could be interpreted as favouring one developer (CVCLT) and in its current form may not be suitable for development management purposes. Possibly could be reworded to support development of affordable housing including by community -led organisations. Supporting text could also refer to the mix of tenures required in Todmorden incorporating the results of the Todmorden Housing Needs Study and the SHMA refresh.

Note

Local Plan References throughout the Plan should be HSX

Other Policies relevant to housing

ED.3 HOME WORKING Applicants should demonstrate how proposals for residential development can support and facilitate homeworking.

Comments

This is an interesting policy, but its implementation may conflict with H2 and its supporting statements. Three-bedroom homes could be built on the basis of 2 bed plus space for homeworking which would conflict with the need for smaller cheaper homes set out in the Housing Needs study. Consultants for Calderdale Council are currently completing a refresh of the Strategic Housing Market Assessment (SHMA) which will look at the mix of sizes needed in a post-pandemic environment. It might also be better to include this policy in the Housing section,

ED.4 VISITOR ACCOMMODATION

Proposals designed to enhance the tourism offer of the town, including visitor accommodation will be encouraged where these: a) Are in keeping with its surroundings in terms of scale and design. b) Demonstrate that the proposals will serve to broaden the town's appeal to tourists. c) Provide a travel plan that considers the needs of staff, guests and other visitors and seeks to keep travel disruption to a minimum

Comments

Proposed changes in legislation creating a new use class for short-term letting mean that there is potential for the conversion of private rented homes to this type of visitor accommodation to be brought under control by the planning system. This will be subject to Local Authorities making an Article Four direction requiring a planning application to change use from a dwelling to short term accommodation (otherwise the change of use will be a permitted development). This policy or a similar one could be recast to justify why Todmorden should have an article 4 direction controlling short-term letting if this is thought to be a potential problem.

NE.2 LOCAL GREEN SPACES The following sites are designated as Local Green Spaces and should be protected from development. This is due to their importance locally as they contribute to landscape significance, historical significance, recreational value or richness of wildlife.

1. Adelaide Street Land
2. Land adjacent to Roomfield Baptist Church
3. Patmos Garden on Burnley Road
4. St Mary's Church Yard
5. Brown Birks Street Land
6. Coal Clough Road (Pitts Estate) Allotments
7. Land adjacent to Vale Baptist Church
8. Centre Vale Parkland
9. Denis' Field, off Woodlands Avenue
10. Land between Stoney Royd Lane and Owlers Walk
11. Land at Longfield Road and Longfield Grove

The enhancement of these sites to improve access, amenity, leisure and recreational opportunities, wildlife or biodiversity opportunities is supported and encouraged

Comment

At least three of these sites; Adelaide Street, Longfield Road and Brown Birks have potential to be infill sites under policy H1

Tom Wignall Avison Young (on behalf of National Grid Electricity Transmission)	TNP9 About National Grid Electricity Transmission 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, so it can reach homes and businesses. National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently. National Grid Ventures (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. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET. Proposed development sites crossed or in close proximity to NGET assets: An assessment has been carried out with respect to NGET assets which include high voltage electricity assets and other electricity infrastructure. NGET has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area. NGET provides information in relation to its assets at the website below. • www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/ Please also see attached information outlining guidance on development close to NGET infrastructure.
Tom Wignall Avison Young	TNP10

(on behalf of National Gas)	About National Gas Transmission National Gas Transmission 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. Proposed sites crossed or in close proximity to National Gas Transmission assets: An assessment has been carried out with respect to National Gas Transmission's assets which include high-pressure gas pipelines and other infrastructure. National Gas Transmission has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area. National Gas Transmission provides information in relation to its assets at the website below. • https://www.nationalgas.com/land-and-assets/network-route-maps Please also see attached information outlining guidance on development close to National Gas Transmission infrastructure.
Craig Broadwith (Historic England)	TNP11 Thank you for consulting Historic England about the Submission Draft of the Todmorden Neighbourhood Development Plan. We wrote to Todmorden Town Council on 23rd October 2023, giving detailed advice on the content of the Plan, and note that the majority our advice has been accepted. We therefore do not wish to comment further on the proposed Neighbourhood Plan and look forward to being notified of the Making of the Neighbourhood Plan, following the Examination and Referendum.
Tom Clarke MRTPI	TNP12 We support recognition of the Hippodrome (site 21) as a non designated heritage asset to be preserved or sympathetically enhanced.
Tom Clarke MRTPI	TNP13

	CCR1 - We support this policy's support for new facilities. We suggest the policy might be enhanced through supporting the upgrading of existing facilities, for example the plans of the Hippodrome to expand their facilities.
Melanie Lindsley (Coal Authority)	TNP14 The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. 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 identified Neighbourhood Plan area there are recorded coal mining features present at surface and shallow depth including: mine entries, shallow coal workings and reported surface hazards. These features pose a potential risk to surface stability and public safety. It does not however appear that the Neighbourhood Plan proposes to allocate any new sites for future development and on this basis the Planning team at the Coal Authority have no specific comments to make.
Sally Wintle (Natural England)	TNP16 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.
Wendy Edge	TNP15 The Neighbourhood Plan has not been widely publicised enough and Todmorden Council should have informed people using well used locations to publicise its existence to ensure that the wider community got to know about it. I visited Todmorden Library about two weeks before the 2023 consultation last September and could only find the Locality Plan and not Todmorden Neighbourhood plan. It was after asking that it appeared early on in the same week as the September 2023 three day consultation on the Neighbourhood Plan. I learned about the Neighbourhood Plan in 2023 by accident after going on You Tube in 2023 and watched a programme informing me about this subject. I then looked on Todmorden Town Council website and attended a couple of meetings to find out more and asked how the council planned to let the wider community know about it. I was advised that Facebook, the local media and the town hall noticeboard were the methods used, and that Todmorden Town Council website publishes all its meeting minutes and advance notice of upcoming meetings that took place on the Neighbourhood plan. The publication methods are unlikely to reach a wide section of Todmorden community because many people don't use these options. People lead busy lives and for the most part are happy to let the council get on with their job. However the Neighbourhood Plan is big and if it goes through will change some of the geography of Todmorden town centre and impact on the residents and

	business livelihoods there. This is why I think the Council should have had a concerted and ongoing information campaign. There are many venues that could be used to get the message across such as: the Library which could have been used on an ongoing basis throughout the process with a dedicated corner in full public view and updated regularly, with someone there on a designated day and time to answer questions, failing that a contact number to answer questions. Also pop up shops, leaflets in the post office, and pvc banner on the town hall not just during consultation process but continuously. I did not realise how much the Town Deal would impact on the Neighbourhood Plan and vice versa. Awareness about the Neighbourhood plan depends on looking for them through the Town council website or encountering a notice on the noticeboard, which because of where it's placed makes it unlikely many people will see it. Coming across them using Facebook, buying a local newspaper on a weekly basis or finding out about it word of mouth. The Neighbourhood Plans mainstay: global warming, emphasis on bicycle lanes and reduction of parking spaces with the emphasis on shared lanes, both for the motor car and pedestrian routes. This theme under the banner of regeneration and a dementia friendly town is unlikely to increase visitor traffic, unless something big is going on at the park, will slow traffic, emit more fumes and serve to make all pedestrians mindful, including those with dementia of what is behind them should they inadvertently step in the path of an oncoming bicycle. How can the community have a sense of involvement if information on these plans is delivered in a way that they have to look for it rather than it being presented to the public in away that seeks to inform and answer some of the more pressing questions. How will the Neighbourhood Plan as a blueprint for the future translate into statutory law and what are it's implications for council tax?
Rosemary Grant-Muller (Calderdale Council) 2. Vision (pp16-25)	TNP17 Cross referencing to the Calderdale Climate Action Partnership theme groups and the Calderdale Climate Action Plan would acknowledge the goals, targets, actions and stakeholders concerning: 2.3 Food Growing 2.4 Developing Skills 2.5 Flooding & Water Management 2.6 Economic Development 2.8 Aims and Objectives
Rosemary Grant-Muller (Calderdale Council) 4. Policy - Housing (pp34-39)	TNP18 Cross-referencing the Calderdale Climate Action Plan Warm & Resilient Buildings theme actions in relation to H.6:

	Start piloting visible and innovative ways of decarbonising homes so we can build the skills needed locally and so people can see what this looks like. Work and influence to ensure that zero carbon homes and neighbourhoods become the standard in Calderdale and are built to protect us from extreme weather. Work with the whole supply chain to make sure new buildings, retrofits and extensions are climate resilient and energy efficient.
Rosemary Grant-Muller (Calderdale Council) 5. Policy- Local Economic Development (pp40-45)	TNP19 Cross reference the Calderdale Climate Action Plan actions in relation to ED.2: Investigate viability 'Remote Working Hubs' in the 6 main towns by 2026 or sooner.
Rosemary Grant-Muller (Calderdale Council) 6. Policy - Natural Environment (pp46-53)	TNP20 Cross-reference the Calderdale Climate Action Plan Land & Nature actions in relation to NE.2, NE.3: Work with communities to find out what changes are best in their streets. These changes might be cycle lanes, car-free days or benches. Identify funding streams to expand commonplace by 2023, find out what communities would like to see in their neighbourhoods. Investigate the options for a car free day by 2026 or sooner. Make sure there is a place for trees and plants in our street scene. Calderdale Council to implement a Green and Healthy Streets Policy for council land and work with partners on this as part of its implementation from 2023. Produce an Ecological Emergency Action Plan by the end of 2023. Collect and collate species and habitat condition data to inform ecological planning. Work with the organisations such as Moors for the Future, the South Pennines Fire Operations Group and others. Work with advisers, farmers and landowners to establish the condition of our moorlands and support actions that will see an increase of our blanket bog in good condition. Increase the NFM capacity in Calderdale. Partnership to review land holdings and improving good ecological management practice that will support nature, support soil health and reduce flood risk where appropriate. Calder Rivers Trust to produce report on Calderdale's land use and carbon emissions. Once complete share findings with the Climate Action Partnership. Set a target for woodlands that can be considered as sustainably managed. Implement the White Rose Forest Action Plan by planting trees in Calderdale
Rosemary Grant-Muller	TNP21 Cross -reference Calderdale Climate Action Plan action in relation to TC.2, TC.3.

(Calderdale Council) 7. Policy - Town Centre (pp54-57)	Ask which communities would like to trial low traffic neighbourhoods. Create a plan to be able to trial low traffic neighbourhood. Work with communities to find out what changes are best in their streets. These changes might be cycle lanes, car-free days or benches. Identify funding streams to expand commonplace by 2023, find out what communities would like to see in their neighbourhoods. Investigate the options for a car free day by 2026 or sooner. Make sure there is a place for trees and plants in our street scene Calderdale Council to implement a Green and Healthy Streets Policy for council land and work with partners on this as part of its implementation from 2023. Make our towns and streets green and resilient by preserving and planting trees. Introducing measures which reduce flooding. Create a communication campaign about the benefits of individuals planting trees and avoiding artificial grass and paving by 2026 or sooner.
Rosemary Grant-Muller (Calderdale Council) 9. Policy - Transport, Accessibility and Movement (pp60-52)	TNP22 Cross-reference Calderdale Climate Action Plan actions in relation to TM.1, TM.2, TM.3: Find solutions to affordability and accessibility by exploring off-street charging issues, different charging hub models and access to be able to purchase an EV Work regionally to produce a West Yorkshire Electric Vehicle Strategy by 2024. Work locally to produce a Calderdale-based strategy or policy by 2025 or sooner. Aim to find ways to support private hire vehicles to consider electric vehicles options. Work with businesses, community organisations and other partners to identify key locations for secure e-bike storage Promote cycle to work schemes with employers to help reduce purchase costs We will aim to install secure cycle lockers similar to places such as Leeds and London We will work with partners to investigate trialling rented bike schemes. Want to see segregated cycle lanes which protect riders and aim to apply LNT1/20 cycle guidance on creating high quality and safe infrastructure. Start the review of Cycling Strategy Start a Travel Plan Supplementary Planning Document (SPD). Work with and support car club providers to expand. Communicate about the current car clubs in the Borough. Work with partners and communities to identify key locations for mobility hubs First Mobility Hub by 2025.
Neil Wallace (Environment Agency)	TNP23 We have no objection to and only offer specific comments either in support or as final suggestions to improve key elements of the Plan. To this end, we will take this opportunity to make the following remarks on the proposed Neighbourhood Development Plan (NDP).

SEA/ HRA

We have no comment on the Strategic Environmental Assessment or Habitat Regulations Assessment.

Neighbourhood Plan

Vision and Community Aspirations We support the overall content and welcome the shared importance placed upon pivotal themes, such as achieving sustainable development, climate change and flood management. Indeed, we acknowledge that Todmorden declared a climate emergency and has since identified a strong and integrated approach to adapt and mitigate the overarching challenges of climate change.

Flood Risk

We acknowledge that Flood Risk is the second highest worry for the future of Todmorden. The Environment Agency welcomes the focused approach and clear importance of reducing the impacts from flooding.

In the Housing section, we support the aims to reduce the impact of flooding through the contribution of SuDS and to build flood resilient housing. We nevertheless would have preferred a priority aim to locate housing in areas at the lowest risk from fluvial flooding.

Surface Water

The Lead Local Flood Authority is now the responsible authority for commenting on the surface water drainage arrangements for new developments. We therefore will avoid any direct recommendations at this stage. We would however wish to highlight the following:

Policy H4: Innovative Housing

An opportunity has possibly been missed here to better highlight and promote the controlled capture of domestic surface water and/ or signpost directly to the key aims of Policy H8: SuDS.

Policy H8: SuDS

We would prefer to see a clear instruction and developers may find it a useful distinction to separate the definitions (and relationship between) fluvial and surface water sources of flooding.

Natural Environment

We welcome the identification of the role that the countryside can play in protecting the environment. We would prefer it if a proportionate reference were made to both urban and rural areas, as there appears to be an applied weighting towards the main impacts being only urban. That said, we support the overall aim to highlight that there is an integrated role for any development proposal to address a range of issues, such as climate change. Again, with the addition of blue infrastructure, the NDP would clearly illustrate that biodiversity enhancement may equally comprise the river corridor. Moreover, we would also welcome specific text that highlights

a need to protect and enhance water quality, rather than the broader use of improvement water management.

NE1: Millponds, Dams and Attenuation Ponds

We support the principles of this policy and acknowledge that it aims to interconnect with a number of strategies and projects to which the Environment Agency offers a partnerships role. For clarity, we would again welcome some distinction between the various sources of flooding are provided and that any development scheme needs to fully and clearly identify these before proposing a solution.

NE3: Green Infrastructure

The Environment Agency acknowledges and supports the overall aims of the policy. Moreover, we support the text that describes the definition up to rivers. We would however prefer it if the policy and wording is refined to reflect Green-Blue Infrastructure. This would clearly identify a need for developers to address water-based credits to achieve biodiversity net gain for developments within the defined distance.

Canal and Riverside

The Environment Agency acknowledges our remit is limited when dealing with land-use planning matters. Nevertheless, our previous comments above to NE3: Green Infrastructure would similarly apply here. Additionally, we would strongly recommend that some consideration might be given to the proximity relationship between rivers and canals, especially with issues of flooding.

Foul Drainage

The Environment Agency recognises that the NDP cannot contain every potential aspect. However, reinforcing to developers of the advance need to consider this critical element may prove beneficial when assessing the viability of a minor and major proposals and subsequently when determining an associated planning application. Yorkshire Water offer a pre-planning service about the capacity of their sewer system for developers / applicants. The applicant should be directed to contact Yorkshire Water to ascertain the possibility of connecting to one of their sewers.