

Placemaking & Design Guide Supplementary Planning Document: Consultation statement

Calderdale Metropolitan Borough Council

Introduction

This is the 'Consultation Statement' for the Placemaking & Design Guide SPD as required by the Town and Country Planning (Local Planning) (England) Regulations 2012. This statement sets out how the public and other stakeholders were consulted upon the SPD. This statement was issued alongside the draft SPD for consultation in January 2024 and has now been updated to reflect the consultation undertaken and accompany the adopted SPD.

Consultation regulations

The SPD is produced in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. The relevant regulations relating to the consultation process are explained below.

Regulation 12: Regulation 12(a) requires the Council to produce a consultation statement before adoption of the SPD, this must set out who was consulted, a summary of the issues raised, and how these issues were incorporated into the SPD. This statement is the 'Consultation Statement' for the adopted SPD as required by Regulation 12(a).

Regulation 12(b) requires the Council to publish the documents (including a 'consultation statement') for a minimum 4 week consultation, specify the date when responses should be received, and identify the address to which responses should be sent. The consultation statement that accompanied the draft SPD set out that information.

Regulation 13: Regulation 13 stipulates that any person may make representations about the SPD and that the representations must be made by the end of the consultation date referred to in Regulation 12. The consultation statement that accompanied the draft SPD set out that requirement.

Regulation 35: Regulation 12 states that when seeking representations on an SPD, documents must be made available in accordance with Regulation 35. This requires the Council to make documents available by taking the following steps:

- Make the document available at the principal office and other places within the area that the Council considers appropriate;
- Publish the document on the Council's website.

These measures were undertaken as part of the draft SPD consultation.

Statement of Community Involvement (SCI)

The SCI was adopted in 2016 and reflects the 2012 Regulations, set out above. It also specifies additional measures that the Council will undertake in consulting upon draft SPDs and these have been reflected in the consultation process for the Placemaking & Design Guide SPD. As per the SCI, the Council has involved key stakeholders in the preparation of this draft SPD for consultation.

Placemaking & Design Guide SPD Consultation Information

Consultation on the SPD has been carried out in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. The draft SPD and Consultation Statement were made available for inspection by the public for a four-week period between Friday 5 January 2024 to Friday 2 February 2024. Copies of the draft SPD and consultation statement (setting out how comments could be made) were available at the following locations:

- Calderdale Council Custom First offices at Horton Street, Halifax
- Public libraries at Halifax Central, Akroyd, Beechwood Road, Brighouse, Elland, Hebden Bridge, King Cross, Mixenden, Northowram, Rastrick, Sowerby Bridge and Todmorden

Copies of the draft SPD were available to view on the Council's website at <https://calderdale.gov.uk/spds>. Further information was available by contacting the Spatial Planning team by email at spatial.planning@calderdale.gov.uk or by telephoning 01422 288001.

The following measures were undertaken to inform persons of the draft SPD consultation and document availability:

- Notification emails sent to all individuals/organisations/bodies that the Council consider will be affected or interested in the SPD, or may be involved in the delivery of the SPD (including people on the Self Build Register, Parish Councils, statutory consultees, developers, business, local voluntary organisations, and all other individuals who have previously participated in the Local Plan examination)
- A press release was issued
- The SPD and details of the consultation were posted on the Council's website.

Summary of Issues Raised and How Incorporated into the SPD

153 representations on the draft SPD were received from external parties, including statutory agencies and housebuilders. Many of the requested changes have been taken forward in the adopted SPD. The following is a summary of the main points:

- Clarity / consistency / drafting issues
- Document would benefit from being easier to navigate.
- Cross references to other documents omitted.
- Some elements are too prescriptive.

- Concerns over the order in which the SPDs have been prepared.
- SPD is weakened by use of 'should' rather than 'must'.
- SPDs should not introduce new policy requirements.
- Prefer it if more local images were used.
- Document seems to be aimed at the large scale rather than small scale development.
- Further explanation of what a Design Review Panel is.
- Design Principle Tables need clarification.
- Consider the impact of materials used on industrial and commercial properties.
- Need to link SPD with Local Area Energy Plan
- Reference needs to be made to gritstone as a building material.
- Some images are not referenced correctly.
- Approach to use of materials is inconsistent.
- SPD needs to ensure street furniture does not result in barriers to accessible environments.
- More clarity in regard to open space typologies required.
- Provide more guidance on proposals adjacent to waterways.
- Comments in relation to street trees and layout
- SPD should be consistent with other SPDs being prepared

In summary the main revisions are:

- Clearer signposting to other SPDs and other guidance where appropriate
- Amended text to ensure consistency with other SPDs
- Additional photos of local architecture
- Further commentary in regard to Calderdale's setting in the South Pennines
- Additional text to expand on the Character of Calderdale's main towns.
- Clearer guidance in relation to street trees, types of open space, and landscaping.
- Amendments to make the Design Principles Index clearer
- Illustrations amended to align with text
- Further case studies added
- Additions to existing appendices

A full schedule of representations received and the Council's response is set out in Table 1. This also details the amendments to the draft SPD.

The SPD has been updated to reflect that it is no longer draft and that the consultation has been undertaken. The overall format has been amended to enhance readability, including the re-ordering of some sections.

Table 1: Schedule of Representations Received and Amendments to SPD

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
Whole document	1138084 Melanie Lindsley (The Coal Authority)	<p>PDG8</p> <p>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 Calderdale area there are recorded coal mining features present at surface and shallow depth including; mine entries, coal workings and reported surface hazards. These features may pose a potential risk to surface stability and public safety. It is noted however that this current consultation relates to a draft Placemaking & Design Guide and I can confirm that the Planning team at the Coal Authority have no specific comments to make on this document.</p>	Noted
Whole document	1349799 Andy van Vliet	<p>PDG4</p> <p>This is a well-written design guide. It's success in driving up quality will rely on a number of factors including its ease of use and the clarity with which it sets a benchmark for new proposals.</p> <p>The document is relatively long and would benefit from a few more navigational tools. There could be a hyperlinked contents table for example. Another option would be to highlight (and hyperlink) the key/ common design principles that designers often fail to apply. These could be linked to the problems set out on P13.</p>	<p>Noted</p> <p>We have broken the SPD into logical chapters so that readers can go directly to the section most relevant for them. We would anticipate that professionals working on larger developments will be able to work through the SPD to see which requirements will be applicable, while householders would</p>

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		<p>The document adopts a character type approach which is useful. Suburban development is discussed on, for example, p64 and 65 however the characteristics on p42 may get lost. Could there be some sign-posting?</p> <p>A 'must/ should' approach has been adopted to implementing the principles which is useful. However, it seems only the high level principles are 'must' and the vast majority of subsidiary principles are 'should'. For example P85 'Proposals must help create memorable places that make it easy for people to find their way around. 3.2.1 Proposals should create a clear network of routes and spaces.' I would have thought 'Proposals must create a clear network of routes and spaces' is appropriate.</p> <p>It would be useful to highlight key design requirements and references such as privacy distances, garden sizes, and POS requirements (not stated in the guide but needed) for example.</p> <p>Council policy and other guidance is stated throughout the document; it would be useful to have an appendix that pulled all this together for quick reference.</p> <p>Where possible it would be helpful to introduce some tangible thresholds and measures, For example 4.6. Parking for Vehicles: refers to avoiding 'long', uninterrupted runs of parking. It could say there must be no more than 4 spaces without a landscape strip of at least 1.5m or a hedge.</p>	<p>only need a small number of pages such as those on extensions, materials and detailing.</p> <p>The approach to must/should has been determined in the context of the Local Plan setting the policy and SPDs providing additional guidance. SPDs are unable to introduce new policy.</p> <p>Privacy distances are set out in the Local Plan, and POS requirements likewise. Garden sizes are not defined due to the individual nature of developments – however 8.3 provides minimum amenity space recommendations.</p> <p>A list of policies and guidance referred to throughout the document has been added to Appendix A2.</p> <p>Parking Standards are set out in the Local Plan. Section 4.6 addresses street design and parking.</p>

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		<p>We use Building for Healthy Life Assessments, it would be useful to incorporate this national framework within the guide (i.e. listing principles against the BHL headings).</p> <p>There is very little regards highway design within the guide. Is there a separate guide proposed?</p> <p>Active Travel Routes are referred to but not defined and it isn't clear when they are required.</p> <p>Given policy Policy BT1: High Quality Inclusive Design there is perhaps not enough guidance on inclusive design (just 6.2 explicitly). Principles such as locating accessible housing in flatter parts of the site near to facilities, continuous safe routes from every home to common destinations, tapping lines etc could be included.</p>	<p>Reference is made to Building for a Healthy Life and developments that are informed by the Placemaking SPD will support the Building for a Healthy Life principles.</p> <p>A separate Highways Design Guide is being developed – this will be a much more technical document than the Placemaking SPD.</p> <p>Policy IM4 of the Local Plan refers to sustainable travel and will be applied on a case-by-case basis.</p> <p>Section 2.3 refers to making places accessible for all; 3.5.2 refers to shop entrances, section 4.0 'Movement' focusses on making environments accessible. In addition, section 5.0 refers to making green spaces accessible, whilst section 6.0 emphasises that streets and spaces should be safe, attractive and accessible.</p>
Whole document	1119998 Simon Tucker (Canal & River Trust)	<p>PDG10 Within Calderdale, our assets comprise of the Rochdale Canal and the Calder & Hebble Navigation. Development alongside our network has the potential to impact the character and appearance of our assets, and the user experience for canal users, including walkers, cyclists, boaters and people accessing our network for other leisure pursuits. In line with the principles of Policy BT1 from the adopted Local Plan, development should seek to respect or enhance the character and appearance of existing buildings and surroundings. This would apply to</p>	Noted

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		<p>canalside environments, and the Trust believe that the Supplementary Planning Documents on design matters have the potential to help ensure that canalised development maximises the benefits of canalside locations and helps to protect and enhance the visual setting of our network.</p>	
Whole document	11488 Penny Price	<p>PDG45 The guide sets out a strong set of overarching principles which have been developed following public consultation. These are highlighted at the beginning of the guidance, but not referred to again. It would be useful if these were reiterated at appropriate points in the design guidance to reinforce the design message. A single case study has been quoted in section 4. Are more to be added? It is stated that check lists are available at the end of section C but these don't appear to be present.</p>	<p>The overarching principles inform the remainder of the document – they cut across all the design principles so are fundamental to these – it would be a case of repeating these on every section.</p> <p>An additional case study has been included.</p> <p>A short design checklist is included at the end of each of the sections of general design guidance.</p>
Whole document	1351339 Rowan Gilbert (NHS Property Services)	<p>PDG50 The Placemaking and Design SPD sets out the Council's commitment to making sure that new developments promote healthier lifestyles and improve overall health and wellbeing. NHSPS support the inclusion of policies and guidance that support healthy lifestyles. There is a well-established connection between planning and health, and the planning system has an important role in creating healthy communities. The planning system is critical not only to the provision of improved health services and infrastructure by enabling health providers to meet changing healthcare needs, but also to addressing the wider determinants of health. Identifying and addressing the health requirements of existing and new development is a critical way of ensuring the</p>	Noted

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		<p>delivery of healthy, safe, and inclusive communities. On this basis, we welcome the inclusion of this comprehensive guidance to accompany Local Plan Policies HW1-3.</p>	
Whole document	11488 Penny Price	<p>PDG44 Almost all the photographs of our fabulous south Pennine landscape include barbed wire and sheep netting, while this is a feature, would it be possible to have some images that didn't show case it?</p>	Various images throughout the SPD have been updated from the consultation draft.
Whole document	1246329 James Langler (Historic England)	<p>PDG118 <u>Summary</u> Generally, we would agree with the principles set out in the draft document which are consistent with the design policies of the National Planning Policy Framework, and the guidance contained within the National Design Guide and National Model Design Code. The draft SPD is clearly informed by an understanding of the unique qualities of Calderdale's built and natural environment and provides an easy to understand set of locally specific design principles. The requirement for the design of new development to be informed by a sites context and positive aspects of local character comes through strongly in the draft design principles.</p> <p><u>Structure and Scope</u> We support the aims of the design guide to provide clarity on expectations early in the design process, reflect local character and identity, and help to create places of a consistently high quality design. At over 160 pages long the draft SPD is not necessarily the concise document envisaged by planning practice guidance.</p>	Noted

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		<p>However, the document is accessible due to its logical structure and use of emboldened text to highlight each design principle and sub-principle making it clear what is expected of development proposals. The document also provides useful links to Local Plan policies and other relevant information where appropriate. We also welcome the clear indication as to where design principles contained in the guide are mandatory or recommended.</p> <p><u>Overarching Design Principles</u> The Council is to be applauded for the collaborative approach it has taken in developing the design guide, with the views of the community and other stakeholders reflected in the six overarching design principles. Historic England are pleased to see that the principles recognise the importance of new design responding positively to the distinctive character of the district and to the context of each individual sites, in terms of both their built environment and landscape qualities. We also welcome the reference made to development proposals utilising the potential these characteristics afford them. The architectural, topographical, historical, cultural and natural context of Calderdale should rightly be viewed as a means by which to create locally distinctive design and attractive welcoming places – as an opportunity to add value to developments.</p> <p><u>Understanding the Context</u> The historic environment makes a significant contribution to the distinctive character of Calderdale, to its economic well-being, and to the quality of life of its communities. The NPPF makes it clear that protecting and enhancing</p>	

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		<p>the historic environment is a key aspect of the environmental objective to sustainable development. An understanding of context, including history, culture and the character of an area, is one of the ten characteristics set out in the National Design Guide which contribute towards the delivery of well-designed places. Paragraph 35 of the National Design Guide states that: "All local design policies, design guides and codes will need to set out a baseline understanding of the local context and an analysis of the local character and identity". The principle that design should be informed by an assessment of the characteristics of the site and its surroundings is further emphasised within the National Model Design Code. This enables design guidance to be informed by a clear understanding of the local area's qualities (both positive and negative) and the opportunities they present.</p> <p>We therefore appreciate the effort that has gone into understanding the character of Calderdale under Part B of the guide, including the role that landscape has played in shaping the areas development, how its communities have evolved over time, cultural influences and what makes different settlements and areas distinctive. This work puts the Council in a strong position when considering the merits of development proposals and will help it achieve the objective of delivering high-quality locally distinctive design.</p> <p>In this regard, we support the requirement for all development proposals to be based on a thorough understanding of how the site relates to its wider context, including its relationship with the historic environment, under Chapter 1.0 of the draft SPD. We also welcome the reference made to applicants needing to consider</p>	

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		<p>settlement specific assessments undertaken as part of Conservation Area guidance and/or Neighbourhood Plan development, and the note under Section 1.2 highlighting that Heritage Impact Assessments may be required by Local Plan Policy HE1.</p> <p>We agree with the identification of a specific area type for historic industrial buildings and complexes. This approach helps to emphasise the importance of these structures to Calderdale's character, the unique opportunities they present and some key design considerations for anyone bringing forward proposals involving mill and/or warehouse buildings.</p>	
Whole document	1351410 Rebecca Hilton (Eden Planning)	<p>PDG77 Excellent design and purposeful placemaking is at the heart of Place Capital Group's approach to housing-led regeneration and therefore, as an organisation it is broadly supportive of the vision for the Draft Placemaking and Design Guide SPD. Nonetheless, we have provided several comments and suggested amendments that are set out in detail alongside this letter.</p> <p>Overall, it is considered that the scope of the SPD is helpful. However, a number of elements are considered too prescriptive, create contradictions and/or are not likely to be effective in all circumstances. We have sought to highlight these and suggest alternate wording or removal of paragraphs as appropriate. In each case we provide a clear explanation.</p>	Noted
Whole document	1182147 Alan Goodrum (Halifax Civic Trust)	<p>PDG51 Halifax Civic Trust considers the draft Placemaking SPD as a much improved document since the early stages of consultation through the Community Review Panel. It is essential that it is not watered down before final</p>	Noted

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		adoption. We think it is important to concentrate on the design issues - which are well illustrated through sketches and photographs, rather than over legalistic arguments over what is written in the document.	
Whole document	1134689 Todmorden Town Council	PDG61 The development committee resolved: <i>That the Town Council formally responds to this consultation to support the introduction of this Supplementary Planning Document and has no issues to raise in respect of content.</i>	Noted
Whole document	1246930 Woodhouse Residents Association	<p>PDG119 <u>Introduction</u> The Woodhouse Residents Association (WRA) was formed and constituted in September 2019 following the Stage 1 Local Plan Inquiry to collectively respond to the Local Plan process and potential delivery of the Woodhouse Garden Community. The WRA continues to grow and currently has 280 members drawn from the local residential and business community and representing a large proportion of properties in the area.</p> <p>We welcome the opportunity to comment on the Draft Placemaking & Design Guide Supplementary Planning Document (SPD) which will be used to control the development proposals across Calderdale as planning applications come forward.</p> <p>One of our members has represented the WRA at the JTP Community Review Panel sessions. Whilst there has not been an opportunity to share information with the group through this process, this input has been welcomed.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p>

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		<p><u>Detailed Comments</u></p> <p>Consultation Process It is pleasing to see that the community engagement on this strategic document is far better than that offered for the Garden Community SPD's. A number of opportunities have been provided to enable input and timeframes for this have been more realistic.</p> <p>Development of Document Approach The WRA has already made detailed comments on the Garden Communities SPD. These comments are also relevant to this document and should be read in conjunction with this document.</p> <p>We continue to raise concern that strategically these documents have been developed the wrong way round. It is disappointing and unclear why the Garden Community Design Guidance and masterplan SPD's were released before this document.</p> <p>A proper, effective planning approach would be for the Draft Placemaking and Design Guide to be developed and consulted on first to set the strategic context and direction for the Garden Community design guidance. You have referred to the national guidance on page 10 which provides detailed guidance on the production of design codes, guides and policies to promote successful design. Why then have you chosen to ignore the due process on this matter?</p> <p>The National Design Code – Coding Process makes it clear at para.20:-</p>	<p>Noted</p> <p>Noted</p> <p>Supplementary Planning Documents provide guidance on the implementation of Local Plan policies. They do not introduce new policy requirements. It was not considered feasible or necessary to prepare this SPD prior to the Garden Community SPDs. In addition, the same consultants JTP, have drafted both this SPD and the Garden Communities SPDs, and therefore this will have aided the consistency of approach where applicable.</p> <p>The local plan policy BT1 sets the overall Design approach across the borough and has informed both the Garden Community SPD and the Placemaking SPD.</p>

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		<p><i>‘The National Planning Policy Framework is also clear that local planning authorities should develop an overarching design vision and expectations that can inform design codes, guides and other tools that inform the design of the built and natural environment in their area, whether prepared by them or other parties’.</i></p> <p>The two SPD (strategic and site specific) MUST be aligned and consistent, the latter being informed by the former. This has not been achieved because of the way the documents have been released and consulted on. We note that the Garden Communities SPD went to Cabinet on 15 January 2024 in advance of consultation on this document. This is contrary to NPPF and open to challenge.</p> <p><u>Other Comments</u> As with the Garden Community SPD, this SPD document is generally diluted by far too much focus on elements that 'should' rather than 'must' be provided.</p> <p>The Engagement strategy has been watered down since the consultation review process which is extremely disappointing.</p>	<p>The NPPF (December 2023) states that Design guides and codes provide a local framework for creating beautiful and distinctive places with a consistent and high-quality standard of design. Their geographic coverage, level of detail and degree of prescription should be tailored to the circumstances and scale of change in each place and should allow a suitable degree of variety. (Emphasis added).</p> <p>Further the NPPF states that “Design guides and codes can be prepared at an area-wide, neighbourhood or site-specific scale”. The legislation does not preclude a site-specific Design Code being prepared in advance of a Borough Wide Design Guide or Code.</p> <p>The SPD must not introduce new policy – the wording is framed so as to ensure the overarching design principles are adhered to, and the sub principles follow on from them.</p> <p>The preparation of the SPD has involved a number of workshops throughout Calderdale, a Community Review Panel, alongside a 4 week consultation period.</p>

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
(Whole Document)	1129568 Marilyn Brichard	<p>PDG144</p> <p>The document is too large and complex for ordinary people to use. Nothing in the guidance is outside what good designers and architects already do so it's value in aiming at improving design overall is limited. The design ethos for Calderdale is not clear.... Where does it talk about the specific identity of Calderdale ... The purpose of a design guide is to educate people on what elements constitute good design and what adds to good design in projects of all levels. This seems aimed at large scale schemes where design professionals should not need to be told what is expected. Separation into smaller more useful documents for householder development, small and middle sized residential etc. Large schemes, industrial and civic schemes are not really necessary in Calderdale where build opportunities are so few.</p> <p>Queries:</p> <p>NDHA should be identified in the first stages ... opportunity for disagreement at later stages of officer assessment</p> <p>Residential Design v Density - conflict between car parking and garage provision being not on the public street scene and the overall density of development.</p> <p>This "guide" is too wide ranging to be useful in any practical way. It should be divided into sections and they should be considered in more detail to provide guidance which can be positive and useful instead of creating points of conflict.</p> <p>Helpful hints on small scale detailing such as window setback, retaining original boundary walls, materials and</p>	<p>The Council considers that the design guide is necessary to improve the standards and consistency of developments across Calderdale. Even though many designers and architects will be familiar with its principles already, setting out our expectations in a formal way enables us to ask for improvements, or refuse if necessary, developments which fall below our standard.</p> <p>The point about the document being large and complex is noted. We have broken the SPD into logical chapters so that readers can go directly to the section most relevant for them. We would anticipate that professionals working on larger developments will be able to work through the SPD to see which requirements will be applicable, while householders would only need a small number of pages such as those on extensions, materials and detailing. Breaking the document into multiple SPDs for different audiences is likely to cause confusion and duplication.</p> <p>Section 1.2 (p50) states that heritage assets must be identified at the beginning of the design process, as suggested by the representation.</p> <p>It is accepted that the proportion of plots taken up by vehicle parking can have an effect on residential density. Careful design</p>

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		<p>their appropriateness and well as showing more good examples would be more beneficial.</p>	<p>should be able to overcome any problem by placing driveways or parking courts in accordance with section 4.6 (pp107-109) and providing sufficient dwellings per hectare across a site to meet Local Plan standards.</p> <p>Examples of good practice for small scale detailing are shown with Chapter 3 – Identity.</p>
Whole document	1341772 Kate Wheeler (Natural England)	<p>The Draft Placemaking & Design Guide Supplementary Planning Document (SPD) refers widely to green infrastructure. It is noted at <i>A2: References to Further Guidance National Framework of Green Infrastructure Standards (forthcoming guidance to be announced)</i>. Please note the Green Infrastructure Framework Standards were launched in January 2023 and can now be included in this SPD. The following information will be helpful to include in the SPD.</p> <p>The Green Infrastructure Framework Natural England has developed a set of GI Principles that underpin the GI Framework. The Principles are intended to provide a baseline for different organisations to develop stronger green infrastructure policy and delivery. The principles cover the Why, What and How to do good green infrastructure.</p> <p>Green Infrastructure Principles The Green Infrastructure Standards are a key component of the Green Infrastructure Framework. They define what good green infrastructure ‘looks like’ for local planners, developers, parks and greenspace managers and</p>	The reference has been updated to link to the new Green Infrastructure Framework.

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		<p>communities, and how to plan it strategically to deliver multiple benefits for people and nature. When used together, these Green Infrastructure Standards will help stakeholders to deliver the 15 Green Infrastructure Principles and enable everyone to benefit from good green infrastructure provision.</p> <p>Green Infrastructure Standards: guidance on national standards for green infrastructure quantity and quality.</p> <p>The five Headline Green Infrastructure Standards are:</p> <ul style="list-style-type: none"> • S1: Green Infrastructure Strategy Standard • S2: Accessible Greenspace Standard • S3: Urban Nature Recovery Standard • S4: Urban Greening Factor Standard • S5: Urban Tree Canopy Cover Standard <p>Green Infrastructure Maps: mapped environmental, socio-economic datasets to support the standards.</p> <p>Green Infrastructure Planning and Design Guide: practical, evidence-based advice on how to design good quality green infrastructure.</p> <p>Green Infrastructure Process Journeys: guides on how to apply all the products in the Green Infrastructure Framework.</p> <p>Development should be based on the Green Infrastructure Principle What 4 - GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality</p>	

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		<p>parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all.</p> <p>The plan should reflect the Green Infrastructure Principle Why 2 Active and healthy places to achieve - green neighbourhoods, green / blue spaces and green routes that support active lifestyles, community cohesion and nature connections that benefit physical and mental health and wellbeing, and quality of life. GI also helps to mitigate health risks such as urban heat stress, noise pollution, flooding, and poor air quality.</p> <p>SuDS should reflect Green Infrastructure Principle Why 4 - GI reduces flood risk, improves water quality and natural filtration, helps maintain the natural water cycle and sustainable drainage at local and catchment scales, reducing pressures on the water environment and infrastructure, bringing amenity, biodiversity, economic and other benefits. SuDs should be integrated and linked to green infrastructure beyond the site boundaries.</p>	

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Whole document	1330374 David Greenfield (Housing Strategy CMBC)	<p>PDG147</p> <p>I sit on the Aging Well Alliance Board which aims to make Calderdale an Age Friendly Community. I'm pleased to see that the SPD has a section on good design for an aging population (although most of the requirements should meet the need of all people, elderly included). One requirement that is missing is requiring the provision of frequent benches so that those with mobility problems can rest. I realize that benches and seating are often avoided because of potential nuisance problems and perhaps further guidance can be given as to the siting and design of these. Seating need not be purpose designed but flat surface of the right height can often provide a seating place.</p>	<p>The following text has been appended to para 6.1.3: <u>"Benches or seating areas should be provided where appropriate, to allow people to rest and socialise."</u></p>
Whole document	11639 Hugh Firman (Calderdale MBC)	<p>PDG149</p> <p>All lighting schemes need to take account of potential adverse impacts on nocturnal wildlife.</p>	<p>The suggested change has been made.</p>
Planning context (p9)	1182147 Alan Goodrum (Halifax Civic Trust)	<p>PDG54</p> <p>The other SPDS in preparation, particularly the Halifax Town Centre and Housing SPDs should be cross referenced here.</p>	<p>The suggested change has been made.</p>
Planning Context (p9)	832881 Mark Jones (Barratt Homes)	<p>PDG121</p> <p>At the beginning of the SPD, on page 9, under Planning Context, the document states a number of important points that apply to the whole document.</p> <p>1. The aim of the SPD is to provide further clarity on policies set out in the Local Plan;</p>	<p>To be addressed in response to later representations.</p>

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		<p>2. It can not introduce new planning policies into the development plan;</p> <p>3. The guidance in this SPD is intended to be adaptable to future policy changes, and to remain relevant in the future.</p> <p>Unfortunately, throughout the document the SPD is seeking requirements which do not accord with the above and therefore need to be amended or omitted from the document. Further detail on this is provided later on in our representations.</p>	
National design guidance (pp10-11)	11488 Penny Price	<p>PDG16 Other Design Guidance: there doesn't appear to be reference to local Neighbourhood Plans or Design Guides such as Todmorden Design Handbook here. These go into more place specific detail about each community and are an excellent reference, so the Calderdale Placemaking can concentrate on the broad-brush design issues. Mention is made later p54 in section 1.5 but applicants don't have unlimited time, they should be directed to local design guidance at the earliest possible opportunity. The second paragraph Green and Healthy Streets doesn't mention trees, these are fundamental to green and healthy streets.</p>	<p>Page 14 states: "The guide should be read alongside relevant Neighbourhood Plans (where available), which offer more detailed guidance for particular areas of the district." The Council considers that this covers the point made.</p> <p>The Green and Healthy Streets paragraph has been amended to include street trees.</p>
National design guidance (pp10-11)	1341481 Steven Heywood (Yorkshire Sport Foundation)	<p>PDG72 I was really pleased to see Sport England's Active Design principles features in this document and those 10 principles being addressed throughout the design guide. We at Yorkshire Sport Foundation are actively promoting the active design principles across all the nine districts of South and West Yorkshire and so is great to see them</p>	Noted

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		being promoted by our partners across all the placemaking and design agendas throughout Calderdale.	
The importance of placemaking (p12)	11488 Penny Price	PDG17 The importance of Placemaking: In the first paragraph, I think it is important that the following is added: The guide puts emphasis on creating places which incorporate high quality green space and green infrastructure.	High quality green space (which includes Green Infrastructure) is made reference to in the first paragraph.
Why is this document needed? (p13)	832881 Mark Jones (Barratt Homes)	PDG122 One of the reasons given on page 13 of the draft SPD is because of the use of standard building designs that could be anywhere in the country. Having standard building designs does not automatically mean poor design. A lot of thought goes in to what customers want in terms of design and functionality, creating a high energy efficient home and a design that works at volume. Anybody who has ever built at volume over the last 100 years including local authorities back in the day, have no choice but to depend on standard designs. If this wasn't the case, then the country would be in a much worse position in terms of housing delivery. I am not aware of BDW Homes house designs resulting in planning refusals either at a local level or via the Planning Inspectorate. Instead, the focus should be on the environment and setting created for the new homes. For example, by looking at the use of materials and the location plus design of the soft and hard landscaping areas.	The Council attaches great importance to building designs responding well to their context. The wording in the SPD does not imply that standard designs are poor design, but that they may be inappropriate for the locality in which they are proposed. This is illustrated by the photographs on p13. The intention of the design guide is to encourage locally relevant architecture. This would not preclude a developer using a standard house type – that the Council considers to be appropriate for a Calderdale/Pennine context – across multiple sites. Suitability will vary based on the urban character and density of the existing settlement.
Overarching design principles (pp16-20)	832881 Mark Jones (Barratt Homes)	PDG123 It is apparent from the document that six overarching design principles have been introduced which emerged from the community and stakeholder engagement	The following amendment has been made: "Proposals must <u>are encouraged to</u> seek to minimise embodied carbon".

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		<p>process. Upon reading the first paragraph on page 16, the immediate concern was whether this was done with recognition that this has to be within the remit of the adopted Local Plan.</p> <p>Unfortunately, it became quite evident that this was not the case when reading the rest of the chapter on pages 16 to 19. In particular, one overarching design principle on page 17 'Act on the Climate Emergency' where it says "<i>proposals must seek to minimise embodied carbon</i>". Whereas Policy BT1 in the Local Plan at part v) says that residential development proposals will be encouraged to minimise embodied carbon etc. The SPD is therefore setting higher minimum standards than is in the Local Plan. We strongly object to this.</p>	
How the guidance is set out (p22)	1182147 Alan Goodrum (Halifax Civic Trust)	<p>PDG52 Welcome the must/should clarification</p>	Noted
How the guidance is set out (p22)	832881 Mark Jones (Barratt Homes)	<p>PDG125 This section says that "<i>where appropriate, references are provided to national and local planning policy</i>". Whilst we would not advise on repeating information contained within the national and local planning policy, in order to keep the SPD streamlined and future proof, it would be helpful to at least make reference to the relevant Local Plan policy throughout the document. This will enable everyone to ensure that the SPD is read within the context of the Local Plan and prevent the SPD from asking for standards which exceed what is required in the Local Plan.</p>	References are provided to Local Plan policies throughout the SPD, located in boxes at the bottom of pages.

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		<p>We welcome the clarification on how the principles are worded, to ensure that it is clear as to what is mandatory and what is being encouraged. However, we are not convinced that the word “<i>should</i>” is appropriate and is not actually that different from “<i>must</i>” or “<i>will</i>”. Instead, we suggest that the use of “<i>must</i>” and “<i>will</i>” is retained but that the word “<i>should</i>” is replaced with “<i>sought</i>” or “<i>encouraged</i>”. This will offer a greater distinction between the two.</p>	<p>The Council considers that there is enough distinction between the different words used, as well as the definitions given on p22, for <i>should</i> to remain.</p>
<p>Applying the Design Guidance (p23)</p>	<p>1246930 Woodhouse Residents Association</p>	<p>PDG119 We support the requirement that departures from both the mandatory and recommended requirements have to be justified (page 23). This is critical for the document to be effective.</p>	<p>Noted</p>
<p>The design process (p25)</p>	<p>1182147 Alan Goodrum (Halifax Civic Trust)</p>	<p>PDG53 The process diagram is helpful but Box 7 which introduces the Design Review Panel needs more clarification in the text in terms of what it is and when it will be used. The only other reference is in the Appendix page 150. Does it meet in public? are the recommendations public?</p>	<p>The Council agrees that Design Review Panel is introduced too briefly on p23.</p> <p>Amendment to box 7: “Review design proposals with officers and <u>where relevant</u>, Design Review Panel”</p> <p>Amendment to paragraph on p25: “In particular, the extent of the design review and community engagement processes will vary significantly between large and small applications. <u>For schemes likely to have a significant landscape or townscape impact, a design review will be expected. This service uses a peer-review panel that will produce recommendations on</u></p>

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
			<i>how to improve the design.</i> Further advice on this is set out in Part D.”
Finding Relevant Guidance (pp26-29)	1246930 Woodhouse Residents Association	<p>PDG119 The four Design principle tables at pages 26-29 are not understandable. The key should appear on each page so the reader can tell what the colours refer to. The 4 categories should be added to the heading bars (will need to be re-orientated to vertical) above the check boxes on each table.</p>	The four pages containing this table have been amended to show the key at the top of each.
Spirit of Place (pp32-33)	11488 Penny Price	<p>PDG18 Spirit of Place: No mention of made of the South Pennines as a specific region, yet Calderdale lies at the very heart of the South Pennines, which is the only area of upland England not protected by any landscape designation, it is a very special area but particularly vulnerable. Calderdale and its communities are intrinsically linked to the South Pennines and its very specific character.</p> <p>This section doesn't reinforce the homogeneity of the architecture and use of gritstone as a building material almost exclusively in the western part of the borough, and not much less in the eastern part.</p>	<p>The following text has been inserted before the final paragraph on p32: <u>“Calderdale sits within the Southern Pennines; its distinctive sweeping moorlands, pastures enclosed by drystone walls, and gritstone settlements contained within narrow valleys. The area contains mosaics of moorland habitats and ecological assets.”</u></p> <p>The Materials and Detailing section on pg46 has been updated to include reference to sandstone and gritstone.</p>
Landscape Character (p34)	11488 Penny Price	<p>PDG19 Landscape Character Reference should be made to National Landscape Character NCA 36 South Pennines, and NCA 37 Yorkshire Southern Pennine Fringe, and at a more local level to the Council's Calderdale District Landscape</p>	The suggested word insertions to the paragraph are acceptable and have been made.

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		<p>Character Assessment and Review of Special Landscape Area Designations by LUC. While not necessary for all development, these are very useful pointers for many designers, and those wanting to understand the local context in greater detail. I would amend the following very slightly: <i>Western Calderdale is characterised by steep incised wooded valleys and high moors with market towns nestling in the valley bottoms and smaller settlements on the hillsides. Each of the main towns has their own unique setting and character. The waterways are one of the many attractive features in the region,</i></p> <p>In the last paragraph on this page it states that flooding is due to the drainage being unable to cope with high run off from the moorlands. This grossly simplifies the situation and is misleading. The mismanagement of the moors has undoubtedly led to greater run off, but other factors, including the development of the flood plain through much of the upper valley, and the preponderance of impermeable surfacing is also a significant factor. Poor maintenance of surface water gullies has also played a significant role.</p>	<p>The following amendment has also been made: “There are large areas of the valley bottom, including urban areas, which are Flood Risk Zone 3 areas. This is due to drainage being unable to cope with high run off from the moorland, but this <u>Flood risk</u> is starting to be addressed through local interventions.”</p>
Movement Networks (p35)	11488 Penny Price	<p>PDG20 The Rochdale Canal and then to the east the Calder and Aire Navigation, run as thread through the borough, linking the east and west parts, and this isn’t emphasised. For info The Canal and River Trust are looking at ways to make the setted sections on the towpath more accessible, these are listed features and can’t easily be changed. The report unfairly emphasises the state of the tow path, the quality is good for the most part: I did the green flag judging for the Rochdale canal</p>	<p>Page 35 aims to provide a summary of transport in the Borough to set the scene. Introducing extra detail on towpath quality and the types of footpaths would not contribute to improved design guidance for developments. However, Burnley has been added to the list of railway destinations for completeness.</p>

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		<p>last Spring and there were only a few places where the towpath was poor, Walsden to the Rochdale border is the worst section.</p> <p>The railway network also connects Manchester to Burnley via Todmorden, and Hebden Bridge to Blackburn both via the Todmorden Triangle, heading northwards. The local cycle network is compromised by lack of safe cycling routes more than the topography.</p> <p><i>'A variety of footpaths'</i> final para page 35 also seriously underplays the importance of footpaths in the borough!</p> <ul style="list-style-type: none"> • Calderdale has the densest network of paths in the UK • The Pennine Way, Pennine Bridle Way both iconic long-distance routes are extremely popular and well walked / cycled and ridden, and there are a number of long distance paths, including Todmorden Centenary Way, Calderdale Way winding their way through the borough. • There is a huge network of packhorse roads and dramways of historic significance <p>It is also worth mentioning that much of the moorland is open access.</p>	
Historical Development (pp36-37)	11488 Penny Price	<p>PDG21</p> <p>This section has been written without the use of the word gritstone: perhaps the single most important material in the South Pennine communities.</p>	<p>Mention is made in the first paragraph of p36 to “use of materials”, and both photographs on the page show use of stone buildings.</p> <p>There has also been an amendment to p46 re materials and detailing.</p>

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
The Character of Calderdale: Settlement Pattern (p39)	1246930 Woodhouse Residents Association	<p>PDG119</p> <p>You refer to the character of Eastern Calderdale on page 39: <i>“Eastern Calderdale includes the main towns of Halifax, Sowerby Bridge, Brighouse, and Elland. Halifax together with Sowerby Bridge constitutes one continuous urban area and forms the main economic driver within Calderdale.”</i></p> <p>The following text then refers only to the character of Halifax and Sowerby Bridge, although we note there is a photo of Brighouse centre. There is no mention of the importance and character of Elland and Brighouse. We object to this omission especially when there is significant growth proposed in these areas. Why is this? This suggests these settlements have no character/importance?</p>	New text added about Brighouse and Elland
Built Form Characteristics - Introduction (p40)	11488 Penny Price	<p>PDG22</p> <p>Built form characteristics</p> <p>Again no mention of gritstone.</p> <p>Is the local character assessment available for public use / reference?</p> <p>The section on materials and detailing gives a tiny amount of information about boundary treatments. While the appropriate use of vernacular design and materials for buildings is well covered, not enough is said about boundaries and how these are such a vital part of the urban street scape. There are some poor examples in Todmorden of shabby boundaries giving a negative</p>	<p>The section on page 46 has been updated to include reference to both gritstone and sandstone.</p> <p>The Local Character Assessment was developed as an internal reference document for JTP rather than an evidence base document.</p> <p>The issue of boundary treatments is considered later in the SPD, in sections 2.6 and 8.3.</p>

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		<p>impression, e.g. the shocking timber fence alongside Lidl, new housing development on Burnley Road where 1.8 m high timber fences have been used along the main road frontage.</p> <p>Stone walls, masonry and drystone walls and railings, and walls and hedges are all used throughout the borough. Retaining walls are invariably stone and where they are not, they are eyesores.</p> <p>I am assuming that detailing such as stone coursing, mortar types and jointing are all too detailed for this document, in which case, reference should be made to local design guides.</p>	
A. Town centre (pp56-57)	11488 Penny Price	<p>PDG23</p> <p>A Town Centre: existing characteristics</p> <p>Massing: It's stated that 3-4 storey buildings is typical of Halifax, and elsewhere generally 2-storey, sometimes 3. This isn't correct: Todmorden and Hebden Bridge, Sowerby Bridge, along main routes buildings tend to be 3 occasionally 4-storey, it is only along secondary routes that 2 storey buildings become more dominant. This is because land is at a premium in these towns and the only space to expand was upwards.</p> <p>New development:</p> <p>It states: <i>New development must reinforce the unique character and value of these historic areas in a way which responds to current demands and helps to enhance the vitality of Calderdale's towns.</i></p> <p>I would add '<i>and landscape</i>'.</p> <p>The design of new facades should respond to the rhythm and scale of the existing buildings.</p>	<p>The massing paragraph has been amended as follows: "Typically 3 and 4 storey, <u>especially</u> in Halifax, with some larger and taller civic and commercial buildings creating local landmarks in key locations."</p> <p>For the new development paragraph, landscape is less relevant to this context, which is limited to town centres. There is a section on streetscape on p56. Therefore, no amendment is considered necessary to p57.</p>

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		<p>There are inconsistencies in the description and guidance between A Town Centre and B Mixed Use:</p> <ul style="list-style-type: none"> • 'A' and 'C' don't mention stone build while 'B' does • 'A' doesn't mention responding to views whereas 'B' does • 'A' doesn't mention responding to boundaries whereas 'B' does. <p>The guidance for 'B' is preferred.</p>	<p>The section has been updated to ensure there is consistency across the sections where relevant, however due to the differing nature of the areas concerned, it is not practicable to address the same elements in the same way across all area types.</p>
A. Town centre (pp56-57)	1182147 Alan Goodrum (Halifax Civic Trust)	<p>PDG55</p> <p>The two pages devoted to this are inadequate to reflect the character, range and diversity of Town Centres in Calderdale. We understand work has commenced on a Halifax Town Centre SPD and this should be cross referenced</p>	<p>A box to indicate that a Halifax Town Centre SPD is planned has been added.</p>
A. Town centre (pp56-57)	1341476 Councillor Colin Hutchinson	<p>PDG81</p> <p>Spill-out areas into the public realm must take particular account of the need for people with impaired vision to be able to navigate safely and with confidence. Minimising street clutter, including advertising boards and enclosing pavement cafes with well-designed barriers incorporating kick-boards would reduce these hazards.</p>	<p>Specific reference to street clutter is made in section 4.1. It is therefore not required to additionally place it in the Area Types section.</p>
C. Terraced street (pp60-61)	11488 Penny Price	<p>PDG24</p> <p>C Terraced streets: Existing characteristics</p> <p>Away from the valley bottom, settlement frequently follows the contours valley sides along the valley sides.</p>	<p>P60 includes the wording: "Linear gridded streets laid over the prevailing topography". This phrase indicates that existing development follows the shape of the valleys.</p>
C. Terraced street (pp60-61)	1341476 Councillor Colin Hutchinson	<p>PDG83</p> <p>Should there be the suggestion of arranging terraces as squares around public spaces, as in Akroydon and in many other towns that expanded in the Victorian period.</p>	<p>The following text has been inserted under 'layout' on p61: "Consider arranging terraces as squares around public spaces; these squares could</p>

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		<p>Squares could incorporate gardens and play areas and could include car-parking in chevron layout.</p> <p>The soft subsoil of much of Calderdale facilitated the inclusion of basements in town dwellings which could increase the internal amenity space of dwellings without increasing the footprint of the building. Can these be encouraged?</p>	<p>incorporate gardens, play areas and include car parking in chevron layout.”</p> <p>It is considered outside of the scope of p61 to encourage the building of basements.</p>
C. Terraced street (pp60-61)	832881 Mark Jones (Barratt Homes)	<p>PDG126 For boundaries, it says “<i>define front gardens with low boundary walls which reflect the character of others found locally</i>”. A boundary wall might not be in character and/or appropriate. Thus, this should be amended to be more flexible and not so prescriptive.</p>	<p>The recommendations on p61 come under the heading of “New development should:”, which is defined to be not mandatory on p22.</p>
D. Blocks in space (pp62-63)	1341476 Councillor Colin Hutchinson	<p>PDG86 Consider making it a requirement that these blocks include secure, undercover, cycle parking. (must)</p>	<p>The following wording has been inserted on p63: <u>“It is essential that secure cycle parking is designed into a development at an early stage. It is also encouraged that cycle parking be covered.</u> <u>In exceptional circumstances, where it is not possible to provide cycle parking spaces on-site, developers will be expected to make a financial contribution towards public provision of such facilities.”</u></p>
E. Suburbs (pp64-65)	1350417 David Witcher	<p>PDG9 There are still inappropriate photos from places quite unlike Calderdale, when suitable local ones must be available; e.g. p65 Harrogate, p69 Rugby, p102 Nottingham & Cambridge, p133 Chelmsford & Pease Pottage, and p137 St. Clements, London, which should really be replaced by the converted Hx Royal Infirmary (same re-use).</p>	<p>Various images throughout the SPD have been updated from the consultation draft.</p>

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
E. Suburbs (pp64-65)	11488 Penny Price	<p>PDG25 E Suburbs: New development New development often backs on to open countryside, where this occurs there is a strong case for reducing the visual impact, while reinforcing local green infrastructure, by creating new hedgerows at the interface between housing and countryside. This may be in association with a timber fence to maintain security, however the imposition of a harsh suburban fence line at the edge of countryside should be avoided. Stone walls may also be appropriate, however a mixed native hedge is an effective and economical solution and when established a real deterrent to intruders.</p> <p>The Persona scheme in Harrogate pictured on page 65 is an excellent scheme in terms of high quality building and well considered landscaping. However this photo does not do it justice, and makes the landscape look like a treeless green desert of manicured grass... which is isn't. They have taken on board a clear philosophy to introduce biodiverse grasslands to the scheme, incorporating areas of meadow grassland, reducing mowing requirements and introducing new tree planting. I tried to upload an image from google street view here but I am unable to.</p> <p>It's good that the authors of this design guide recognise the qualities of good design here, but applicants in Calderdale need to be told a lot more about what makes this scheme good. For instance there is no mention in this design guide about the different grass types that can be used and when and where these are appropriate. I will comment further on this in my comments on section C.</p>	<p>The following new paragraph has been inserted on p65: Boundary treatments:</p> <ul style="list-style-type: none"> • Ensure appropriate walls or hedgerows are provided where suitable, particularly where development borders open countryside. Timber fencing should be avoided. <p>It is considered that it would be too high a level of detail to discuss the different types of grass on this page. For a planning application, grass types will be suggested by colleagues in Ecology if necessary.</p>

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
E. Suburbs (pp64-65)	1182147 Alan Goodrum (Halifax Civic Trust)	PDG56 In contrast to our comment on Town Centres, this section works well because of the blandness and uniformity of existing development.	Noted
E. Suburbs (pp64-65)	1341476 Councillor Colin Hutchinson	PDG87 Avoid long straight streets, which encourage excessive speed. Include other design features to encourage reduced speed of motor vehicles.	It is considered that this aspect of street design is addressed by the sentence on p103: “the street hierarchy should put the needs of pedestrians and cyclists first, rather than designing road networks which maximise traffic flows” and therefore extra change to p65 is not required.
E. Suburbs (pp64-65)	832881 Mark Jones (Barratt Homes)	PDG127 This part of the SPD (page 65) talks about permeability, density, street hierarchy, frontage, landscape and parking, but for all of this it says “ <i>New development should.....</i> ” comply with the requirements under these headings. Whilst the majority of content is okay, we do object to the “Density” requirement stipulating that small apartment blocks and bungalows should be introduced. This should be left to market demand, housing mix and SHMA evidence. We therefore suggest that this is removed from the text, and that the introduction wording where it says “ <i>should</i> ” be amended to something like “ <i>should aim to.....</i> ”	There is already flexibility in the existing text where it refers to introducing “a wider range of housing types ...in appropriate locations”. The Local Plan policy on housing mix is still the starting point, and the SPD does not change this.
F. Buildings in the countryside (pp66-67)	11488 Penny Price	PDG26 F Buildings in the Countryside: New Development No mention is made of agricultural buildings where the careful use of appropriately coloured cladding and roofing can make a tremendous difference to a building’s visibility.	The colour palette of a building is covered under the Materials section of p67.

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		No mention is made of the use of appropriate screening with planting, which could both reduce the visual impact and add to local green infrastructure.	Screening with planting may not always be appropriate. Considering the visual impact is addressed under the Respond to context section of p67.
F. Buildings in the countryside (pp66-67)	1182147 Alan Goodrum (Halifax Civic Trust)	PDG57 Photograph on page 67. What is this supposed to illustrate? Looks to be a poor example.	The photograph has been replaced.
G. Industrial/Commercial (pp68-69)	1330316 Tracy Hanson (West Yorkshire Police)	PDG5 G. Industrial page 69 states...Break down car parking areas into a series of smaller areas with green infrastructure between, to limit their visual impact and help with flood mitigation. West Yorkshire state.. that if green infrastructure is being planted then the shrubs are no higher than 1.3m and tree canopies kept high, otherwise the greenery can act as hiding places for any would be offender. We would prefer the mention of green infrastructure is removed. All greenery should be carefully considered and should be mentioned throughout the document.	The Parking and servicing first bullet has been amended to: “Break down car parking areas into a series of smaller areas with green infrastructure between, to limit their visual impact and help with flood mitigation, <i>whilst ensuring that green infrastructure is visually permeable.</i> ”
G. Industrial/Commercial (pp68-69)	11488 Penny Price	PDG27 Advice on colour palette which is given in section F is not included in industrial and commercial development, which can be visible from a great distance, the overall visual impact of these can be reduced which matters even in urban areas. Example of excellent use of colour on cladding industrial buildings can be seen at Altham Industrial Estate, Hyndburn, Lancashire. A very large building in the middle of the estate is barely discernible at a distance, as it is dark grey green in colour, while smaller lighter coloured buildings are clearly perceptible, it's not until you get	The following changes have been made to p69: “Soften the hard edges around industrial units with attractive hard landscaping and areas of ground cover planting.” New bullet under Built form: • <i>“Consider how the overall colour palette of the development will appear in long and short range views, and at different times of the day.”</i>

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		<p>much closer that the outline of the building begins to be discerned, and a dark roof offers further disguise. Light and highly reflective roofed buildings have very high visibility.</p> <p>I had hoped to add photos here but I am unable to. The paragraph on Streetscape relating to Industrial and Commercial states: <i>“Soften the hard edges around industrial units with attractive hard landscaping and areas of ground cover planting.”</i> I think this is a typo in part, as attractive areas of hard landscaping are not going to soften the surroundings, this clause needs rewriting.</p> <p>Areas of amenity grassland within industrial and commercial areas should be limited and reserved for high profile entrances etc. Opportunity should be made to create areas of biodiverse meadow areas, which could include new Suds wetlands, which link with hedgerows and new areas of native woodland into the existing green infrastructure. Existing vegetation should be retained where possible and used as a landscape framework.</p> <p>The concept of permeable paving in carparking areas to industrial and commercial development should be introduced here.</p>	<p>No change has been considered necessary regarding the amenity grassland.</p> <p>Permeable paving is included as a “should incorporate” under 4.6 Parking for Vehicles (p108).</p>
G. Industrial/Commercial (pp68-69)	1182147 Alan Goodrum (Halifax Civic Trust)	PDG58 Photograph of rugby Radio Station. There must be a good local example that could be used or at least West Yorkshire.	The photograph has been replaced.
G. Industrial/Commercial (pp68-69)	1341476 Councillor Colin Hutchinson	PDG98 Encourage the incorporation of photovoltaic arrays on roof spaces of commercial buildings, with associated battery storage.	The matter of encouraging photovoltaic panels and solar thermal panels is covered on p140.

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		<p>efficient (re-)development with a fabric-first approach. Although electrical load from each dwelling is expected to increase as electrical power begins to displace gas for heat and petrol/diesel for transport, fabric efficiency will mitigate this and allow for a more stable demand profile, making it easier to provide stable, safe supply for all customers on our network.</p> <p><u>Heating</u> Part C section 9.4 clearly states that gas heating will not be permitted in any future developments in Calderdale, and explicitly mentions heat pumps will be the major alternative. This is likely the most appropriate technology for the majority of buildings, and is reflective of our Distribution Future Energy Scenarios Best View for the region. However, I strongly advise a conversation around the emerging Local Area Energy Plan (see below) to allow you to signpost to other low carbon options that may be more effective for the particular circumstance, such as district heat networks.</p> <p><u>Electric vehicles</u> In Part C section 4.6.4, it is noted that electric vehicle charging points should be installed in line with Building Regulations, and innovative on-street charging solutions are welcomed for those developments without 100% off-street charging availability. From a distribution system operation perspective, increasing availability of charging solutions for electric vehicles, especially related to home charging, will facilitate more flexibility of demand profiles. Charging EVs during periods of low demand (i.e. 12am-5am) or at periods of high generation, electric vehicles can act as distributed flexibility, reducing peaks on the</p>	<p>Para 9.4.1 has been amended to: “This includes air or ground source heat pumps, photovoltaic panels (PV) and other technologies. <i>Applicants are recommended to consult the Council’s Local Area Energy Plan for the full range of low carbon options.</i> Buildings should be designed to accommodate.....”</p> <p>Noted</p>

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		<p>network and protecting assets. In the future, these same infrastructure points may allow Vehicle-to-Grid discharge (i.e. feeding back into the network, or into local independent networks, at periods of high demand). Therefore we are highly supportive of the inclusion of EV chargers in all new or significantly changed developments.</p> <p>Northern Powergrid have recently begun supporting local authorities to install on-street charging via street lamps, and the learning in this process will be valuable in supporting developers in Calderdale in the future. This is one way to support a fair and just transition – opening up the opportunity for EV charging to a wider population.</p> <p><u>Local area energy planning</u> There is an opportunity here to link to some ground-breaking work being done by Calderdale’s climate team, who are currently creating a Local Area Energy Plan complete with digital twin for the whole region and every building therein. The plan will provide details on the most cost-effective route to net zero for the energy system including the most appropriate low carbon heat sources for each property and required rollout of retrofit and EV charging infrastructure. As such, it may be useful to signpost to the Local Area Energy Plan once complete within this document (completing April 2024).</p>	<p>Noted</p> <p>Agreed. Please refer to suggested amendments to paragraph 9.4.1.</p>
2.1 Building Height and Density (pp75-76)	1341476 Councillor Colin Hutchinson	<p>PDG90 I very much like the clarity of the green tick-boxes in this and subsequent sections.</p>	Noted

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
2.1 Building Height and Density (pp75-76)	1351410 Rebecca Hilton (Eden Planning)	<p>PDG78</p> <p>Paragraph 2.1.1 states: <i>“Proposals which do not respond in any way to the height of their surroundings will not be acceptable”</i>.</p> <p>We feel that this statement does not allow enough flexibility for developers and may not be conducive to good design in all circumstances. For example, the Calderdale Housing Strategy (2021-2026) highlights that there is a need for two or three bed houses together with one and two bed bungalows, which may not be typical in a certain area. As such, there should be flexibility on building height within the SPD.</p> <p>Suggested Modification for Paragraph 2.1.1: “Proposals which do not respond in any way to the height of their surroundings will not be acceptable”. <i>“Proposals should respond to the height of their surroundings. A variation to this will need to be evidenced.”</i></p>	The suggested amendment has been made.
2.2 Calderdale Building Types (p77)	1351410 Rebecca Hilton (Eden Planning)	<p>PDG79</p> <p>Paragraph 2.2.1 states: <i>“Proposals should use building types which reinforce the distinctive character of Calderdale and the settlements within it. This may include the use of building types which are not common in other parts of the country.”</i></p> <p>Whilst we agree with this approach to some extent, this has the potential to prevent creativity and innovative design due to the need to reflect existing character.</p> <p>Suggested Modification for Paragraph 2.2.1: “Proposals should use building types which reinforce the distinctive character of Calderdale and the settlements within it. This may include the use of building types which are not common in other parts of the country.”</p>	The paragraph has been amended to: “Proposals should use building types which reinforce the distinctive character of Calderdale and the settlements within it. This may include the use of building types which are not common in other parts of the country. <u>Where there are proposals to introduce creative and innovative designs a clear design rationale will be required to justify the departure from the character of the area.</u> ”

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		<i>"Proposals should consider the type(s) of buildings in the surrounding area and complement them or provide clear design rationale for the building types proposed"</i> .	
2.3 Building on Slopes (pp78-79)	11488 Penny Price	PDG28 The use of appropriate properly specified soft landscaping should be considered for stabilising steep slopes when appropriate.	The Council agrees and has added the following text to para 2.3.4: <i><u>"Where some land reprofiling is necessary, the use of soft landscaping should be considered for stabilising steep slopes if appropriate."</u></i>
2.3 Building on Slopes (pp78-79)	1182147 Alan Goodrum (Halifax Civic Trust)	PDG62 In general we welcome this section but 2.3.7 needs qualifying. Large retaining structures are a characteristic of parts of the area, the Southowram 'banks' are an example. One has recently been rebuilt successfully to provide improved sightlines. Thus stone retaining walls where they are a characteristic of the local area should be incorporated into the design framework.	The section already includes reference to the fact these are a characteristic and necessary feature of parts of Calderdale. The second paragraph of 2.3.7 does require good quality materials and detailing to be used.
2.3 Building on Slopes (pp78-79)	832881 Mark Jones (Barratt Homes)	PDG128 It is important that the opening paragraph to this section of the SPD on page 78 acknowledges that Calderdale is a district which has some of the most challenging topography in the country. In light of this, the SPD needs to allow for greater flexibility on development situated on sloping land.	Calderdale's steep topography is referred to in paragraph 2.3.2. The Council does not consider there is a need to re-emphasise this further on the same page.
2.4 Clearly Defined Street and Spaces (p80)	11488 Penny Price	PDG29 The relationship between new buildings and the canal and river corridor should be addressed to ensure new development faces the waterway.	This matter has been addressed at para 5.4.2 on p117.

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
2.4 Clearly Defined Street and Spaces (p80)	1351410 Rebecca Hilton (Eden Planning)	<p>PDG80</p> <p>Paragraph 3.4.5 – this paragraph is numbered incorrectly and should be 2.4.5.</p> <p>Whilst we agree that the provision of minimal gaps between buildings may be appropriate to achieve desired density, this needs to be balanced with amenity and open space requirements.</p> <p>Suggested modification for Paragraph 3.4.5 (2.4.5): <i>“Where appropriate and with open space and amenity requirements in mind, gaps between buildings should be minimised to create a good sense of enclosure to streets and spaces.”</i></p>	<p>The paragraph numbering has been amended.</p> <p>The following amendment has been made to 2.4.5: <i>“Gaps between buildings should be minimised to create a good sense of enclosure to streets and spaces. The appropriate size of gaps will vary to suit different building types and locations, <u>and to protect amenity</u>, but boundary walls should be used as linking elements between buildings facing the public realm.”</i></p>
2.5 Building Line and Set-back (p81)	1351410 Rebecca Hilton (Eden Planning)	<p>PDG82</p> <p>This section emphasises that the building line should be consistent with adjacent buildings and the character of surrounding streets. We feel that a single linear building line is not always appropriate and may prevent national and local aims of creating a sense of place. Variable building lines may in some instances be appropriate.</p> <p>Suggested modification: <i>“Where there is little or no existing context, proposals should establish a common building line which is consistent with the overall character of good quality streets in the wider area. <u>Where there is no dominant building line or strong building line does not align with the design vision for a scheme, a clear approach and justification should be provided by the applicant.</u>”</i></p>	<p>The Council considers that there is sufficient flexibility in the SPD draft text which states: <i>“Proposals should reflect and respond to the prevailing building line and set-back unless there are strong urban design reasons for departing from this alignment.”</i></p>
2.5 Building Line and Set-back (p81)	1129568 Marilyn Brichard	<p>PDG144</p> <p>Large variety of setback is uncommon in Calderdale and will not be acceptable. Too definitive</p>	<p>The Council Considers that there is sufficient flexibility in the SPD draft text which states:</p>

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		Look at the north side of Towngate in Heptonstall	"Proposals should reflect and respond to the prevailing building line and set-back unless there are strong urban design reasons for departing from this alignment."
2.6 Public and Private Space (pp82-83)	11488 Penny Price	PDG30 Para 2.6.5. The use of formal hedges in association with stone walls and on their own can also be encouraged. Timber fences fronting onto streetscapes are not appropriate.	The text for 2.6.5 is amended to: "The use of locally distinctive stone walls is encouraged. <u>They may be used in combination with hedging if appropriate.</u> <u>Timber fencing will not normally be an acceptable residential boundary treatment.</u> "
2.6 Public and Private Space (pp82-83)	1129568 Marilyn Brichard	PDG144 Conflict between following the character of the area where the terraces are at the back of the pavement and the intention to refuse dwellings without defensible space.	The intention of the design guide is that defensible space will be provided for all residential developments, even where not featured in the existing local character. Where existing properties are situated at the back of the pavement, new dwellings can take their cues by using a similar built form (e.g. terrace) and a consistent building setback line. An exception for infill is explained in para 2.6.3.
2.7 Turning Corners (p84)	1351410 Rebecca Hilton (Eden Planning)	PDG84 In relation to paragraph 2.7.1 it is our view that there needs to be a greater balance between design, amenity, and surveillance. Whilst passive surveillance can be important for crime prevention, in some instances, this may not be conducive of providing good design, amenity and privacy. Suggested modifications for Paragraph 2.7.1: <i>"Where appropriate and with good design and amenity in mind, buildings located on corners are encouraged to</i>	Text amended as follows: <u>2.7.1 Buildings located on corners should have entrances and/or generous windows to habitable rooms on both primary elevations.</u> This is to maximise passive surveillance of streets and spaces and to avoid blank, or largely blank, gable ends facing the public realm. In some circumstances this may not

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		<i>have entrances or habitable rooms on both primary elevations”.</i>	be appropriate for reasons of amenity or privacy and an alternative design approach may be proposed.
2.7 Turning Corners (p84)	832881 Mark Jones (Barratt Homes)	PDG129 We support the emphasis on addressing the fenestration on buildings located on corners, to ensure that they address both frontages. However, we object to section 2.7.4, which states that “ <i>side boundaries to gardens which face the street should be formed from walls rather than fences</i> ”. We have found that a combination of a base wall with fence panels can be very effective. To just provide a solid wall adjoined and combined with the wall of a house, can appear as quite a hard and harsh boundary treatment for a streetscene. We therefore suggest that other hard and soft materials are acceptable, such as a combination of wall and fencing or wall and planting.	The Council considers that fence panels are generally likely to increase the blankness of a wall if used in combination. However, soft landscaping is often acceptable to reduce a harsh appearance. 2.7.4 is amended to: “Side boundaries to gardens which face the street should be formed from walls rather than fences. <u><i>The wall may be used as a base in combination with planting.</i></u> ”
2.8 Easy to Find Your Way Around (p85)	1182147 Alan Goodrum (Halifax Civic Trust)	PDG64 Creating a new sense of place illustration. Focal Buildings/Vista - in general this is often a good idea but has to be seen in the context of local topography. The Woolshops illustration (page 125) is a good example of a sense of place being created by a view out to the landscape, tracing the historic route of the Wakefield Gate. A sense of place and closure to views can often be created by the landscape in Calderdale.	The Council agrees that existing landmarks can be important when views are established out of a new development. Para 2.8.3 has been appended: <u><i>“Existing local landmarks and features such as spires and long-range views may also be incorporated into a development through the layout and positioning of buildings.”</i></u>
2.8 Easy to Find Your Way Around (p85)	1351410 Rebecca Hilton (Eden Planning)	PDG85 This section is numbered incorrectly. Paragraph 3.2.3 (should be numbered Paragraph 2.8.3) states:	Provision of focal buildings is implicitly being encouraged by use of the word “should”, but not made mandatory. This affords developers the discretion to deviate when they feel it appropriate and justifiable.

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		<p><i>“Proposals should create local landmarks through the positioning of focal buildings or landscape features at key locations”.</i></p> <p>The provision of focal buildings may not be proportionate for all schemes.</p> <p>Suggested modification for Paragraph 3.2.3 (2.8.3): <i>“Proposals are encouraged to create local landmarks through the positioning of focal buildings or landscape features at key locations where appropriate”.</i></p>	<p>Paragraph numbering for p85 has been updated.</p>
<p>2.8 Easy to Find Your Way Around (p85)</p>	<p>11488 Penny Price</p>	<p>PDG31</p> <p>Para 3.2.3 (Is this para numbering correct??) As well as placing new landscape features, existing landscape features, can be used as focal points, to terminate vistas etc e.g. Stoodley Pike in Todmorden, church steeples, chimneys etc.</p>	<p>The Council agrees that existing landmarks can be important when views are established out of a new development.</p> <p>Para 2.8.3 has been appended: <u>“Existing local landmarks and features such as spires and long-range views may also be incorporated into a development through the layout and positioning of buildings.”</u></p> <p>Paragraph numbering for p85 has been updated.</p>
<p>2.9 Roofscape and Skyline (pp86-87)</p>	<p>832881 Mark Jones (Barratt Homes)</p>	<p>PDG130</p> <p>It is noted on page 86 of the draft SPD, that there is no reference to hipped roof styles. We therefore request that this is added to the content of the page.</p> <p>On page 87 at section 2.9.5, it says that <i>“chimneys should be included where they are integral to the character of the proposed building”</i>. Our view is that this will not apply to modern style housing which have been designed in an era where traditional fireplaces are no longer a suitable means of sustainably heating a new home. On this basis we do not object, however if the</p>	<p>The Council does not feel any need to specifically mention hipped roof styles. They are neither encouraged nor discouraged and will be considered in context as part of any proposal.</p> <p>Para 2.9.5 explains that chimneys per se are not being discouraged, but that they should only be included where it is appropriate to the character of the proposed building. Developers are therefore free to choose not to propose chimneys if their</p>

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		intention is to impose this on every new home built in Calderdale, then we do object.	house design is of a more contemporary style.
3.0 Identity (pp92-99)	11488 Penny Price	PDG32 Where appropriate reference should be made to the Design Guides recently prepared for different neighbourhoods e.g. Todmorden Design Guide.	A new paragraph referring to neighbourhood plans has been inserted on p9.
3.1 Creating Distinctive Places (p93)	11488 Penny Price	PDG33 Para 3.1. The requirement for incorporating Biodiversity Net Gain which is now mandatory, should be mentioned here. Landscape is no longer a desirable add-on, it's a necessary part of the development and the text needs to reflect that.	Biodiversity Net Gain is distinct from landscape design for aesthetic reasons. Retention of biodiversity is referred to in para 3.1.3. The Council is also intending to shortly adopt a Biodiversity Net Gain SPD which will contain detailed guidance in respect of BNG.
3.1 Creating Distinctive Places (p93)	1351410 Rebecca Hilton (Eden Planning)	PDG89 We welcome this section as it gives developers/applicants the ability to create distinctiveness in an area that lacks placemaking.	Noted
3.2 Windows and Doors (p94)	832881 Mark Jones (Barratt Homes)	PDG131 On page 94 of the draft SDP, it seeks well balanced size and position of windows. However, as alluded to within section 3.2.4, there has to be a balance acknowledging the ever-increasing demands of building regulations regarding insulation and air tightness. Furthermore, the internal layout and design may be a factor in the size and position of a window or similar opening. We are grateful that this is acknowledged and trust that officers when determining planning applications will take this into account.	Noted
3.3 Dormer Windows (p95)	1350417 David Witcher	PDG47 Page 95 para 3.3.	The diagram has been amended as suggested.

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		The illustration of well-proportioned dormer windows does not have the pitched roofs as recommended at 3.3.6.	
3.4 Materials and Detailing (pp96-97)	11488 Penny Price	PDG34 Para 3.4.8 The colour of building materials should be considered in relation to commercial and industrial buildings, where the importance of building colour can be significant in reducing the visual impact of very large buildings. E.g. dark grey greens blend into the background where light blue greys will not. (see comments on section 1.5 G earlier)	The Council considers that 3.4.8 of the draft SPD addresses this comment.
3.4 Materials and Detailing (pp96-97)	1351410 Rebecca Hilton (Eden Planning)	PDG92 We welcome the SPD encouraging innovation to give developers/applicants move flexibility when designing schemes whilst respecting the local character of the area.	Noted
3.4 Materials and Detailing (pp96-97)	1351380 Andrew Rose (Spawforths)	PDG71 Keyland welcomes the Placemaking and Design Guide and supports the aspirations and objectives of creating better places. The SPD largely amplifies and creates clarity on the design policies in the Local Plan. However, in some instances there are inconsistencies within the document and the need for further clarity. Within the section “Understanding the Place” there are several sections that review and explain the character of Calderdale. These tend to highlight the characteristics of the built form in Calderdale and emphasise the local vernacular. However, within these sections the materials and detailing illustrated only show traditional stone buildings and features. There is an acknowledgement that there are other types of buildings, however such imagery and examples are not provided, and the	Noted Additional images added to the SPD to address this point.

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		<p>impression provided is that all new schemes should be natural stone.</p> <p>Section 3.4 then provides guidance on “Materials and Detailing” and states that materials must be carefully chosen to complement the site context and reinforce local distinctiveness, although this does not preclude the use of new or innovative solutions if well designed. The guidance then focusses on traditional design approaches and that materials should be sourced locally. The approach preferring a more naturalistic approach, including traditional stone.</p> <p>However, later guidance on “Resources” within Section 9.3 on “Sustainable Construction” suggests proposals should “reduce embodied carbon” and “use more sustainable construction methods” preferring timber frame, modular and modern methods as they use less embodied carbon. This moves away from natural stone. However, within “Lifespan” the guidance then suggest that buildings are designed to be flexible and adaptable for the long term, which is not necessarily achievable with modern methods of construction.</p> <p>The document is therefore internally inconsistent and provides conflicting advice and should be clarified. Equally, the emphasis on natural stone in imagery and context suggests that only that material is acceptable. Keyland, consider that a more appropriate and clarified approach is one of a broad palette of materials and that schemes should reflect the local vernacular.</p>	<p>The SPD is written in a way that although places emphasis on complementing the site context and reinforcing local distinctiveness but does not preclude the use of different materials and innovative solutions if they are well designed.</p>

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
(Whole Document)	1129568 Marilyn Brichard	PDG144 Failure to recognise that the use of stone is not a panacea that makes design look good in the context of historic buildings. Stone varies across the district in colour, texture and coursing. Previous requirements to build in stone did not automatically mean that buildings will fit into the area. Examples throughout the district reveal “yellow” houses, stone sprayed black where the colour has washed off and non-matching coursing ... none of which contributes positively.	The Council considers that section 3.4 recognises that flexibility may be required.
3.5 Shopfront Design (pp98-99)	1182147 Alan Goodrum (Halifax Civic Trust)	PDG65 We welcome this section. The problem we foresee is areas like King Cross where substantial damage has already been done - will the effect of the guidance be weakened by the precedents that exists? A section which acknowledges inappropriate development in the past will not be used as a precedent for future decisions would be welcome. A statement to this effect applying to the whole document could be made earlier in the Planning Context section.	Future applications will be judged against the Local Plan and the SPD – each application will be judged on its merits.
3.5 Shopfront Design (pp98-99)	1341476 Councillor Colin Hutchinson	PDG93 Signage placed on pavements should be actively discouraged as an unnecessary barrier to people with visual impairment, wheelchair users and people pushing buggies.	This matter is addressed in para 4.1.4.
4.0 Movement (pp100-111)	1182147 Alan Goodrum (Halifax Civic Trust)	PDG66 Illustrations on page 102; still too many non-local examples.	Noted – however certain examples are included from elsewhere to emphasise particular principles.
4.1 Green and Healthy Streets (p101)	1341476 Councillor Colin Hutchinson	PDG94 The design and positioning of street furniture must not pose additional barriers to accessibility and navigation by	Para 4.1.4 is amended: “Signage, and advertising <u>and other street furniture</u> must maintain an accessible environment for all footway users, including

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		people with impaired vision, wheelchair users or people pushing buggies.	the visually impaired <i>and wheelchair users</i> . For this reason, the use of A frame boards is discouraged.”
4.1 Green and Healthy Streets (p101)	1351410 Rebecca Hilton (Eden Planning)	<p>PDG97 Paragraph 4.1.1 refers to the provision of street trees and landscaping incorporated in the design of new streets. This may not be appropriate in all cases and space available may prohibit tree planting. Clarity on responsibility for maintenance should be confirmed. Are street trees something the Council is actively looking to maintain, or will this fall to the developer / management companies?</p> <p>Paragraph 4.1.2 states: “<i>Trees should be located in groups</i>”. This conflicts with Paragraph 4.1.1 which implies that street trees should be incorporated throughout streets to passively cool streets. Some clarity on what is meant by “groups” would be welcomed.</p>	<p>The guidance supports the Council’s policy on Green and Healthy Streets.</p> <p>Maintenance will depend on the site, scale, use, and location.</p> <p>Paragraph Reworded to: <u><i>4.1.2 Trees and green verges should be grouped together to provide meaningful landscape provision.</i></u></p>
4.1 Green and Healthy Streets (p101)	11488 Penny Price	<p>PDG35 It’s suggested the following phrase is added:</p> <p><i>4.1.1 Street trees and landscaping should be incorporated in the design of new streets. Street trees passively cool streets, providing shade and shelter, filtering out air pollutants, as well as increasing biodiversity and greening up the public realm.</i></p> <p><i>4.1.2 Trees should be located in groups. Species should be chosen to be hardy, easy to maintain, and characterful. Raised planters are a good option to contain</i></p>	<p>The suggestion to refer to filtering out air pollutants will be adopted. This is a key benefit of providing street trees and makes a street healthier and more pleasant to experience.</p> <p>Amendment to para 4.1.1: “Street trees passively cool streets, providing shade and shelter, as well as <u><i>filtering air pollutants</i></u>, increasing biodiversity and greening up the public realm.”</p>

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		<p><i>planting, ease maintenance, reduce risk of damage, and ensure soil quality.</i></p> <p>Only small trees should be used in planters, and there must be a maintenance regime in place to ensure watering takes place during dry spells. Trees planted in paved areas require specific detailing incorporating tree soils and adequate means for air and water to the root system. Where trees are planted alongside paved areas then root barriers should be considered to avoid pavement heave.</p> <p>4.1.3 Nature based surface water drainage: good quality guidance should be provided for developers.</p> <p>4.1.4 Signage should be rationalised to avoid multiple posts which are unsightly and present an obstacle for the less mobile.</p>	<p>The Council's Ecologists are consulted on planning applications and will make the necessary recommendations in relation to tree types most appropriate.</p> <p>This level of guidance and detail is set out in the Flooding and Drainage SPD</p> <p>The intention behind the suggestion for rationalisation of signage is present already in para 4.1.4 which says "streets should be free of physical and visual clutter".</p>
4.1 Green and Healthy Streets (p101)	832881 Mark Jones (Barratt Homes)	<p>PDG132</p> <p>We object to section 4.1.1 on page 101 which says that "<i>street trees and landscaping should be incorporated in the design of new streets</i>". Street trees should be aspirational but not a requirement. It is not always possible to achieve street trees due to highway, ownership, management and viability constraints. For example, for a street tree to fall within the proposed adopted highway results in a significant cost for future maintenance via commuted sums. Thus, we request that this is amended to encourage the use of street trees but make it clear they are not essential. There are other means to address the streetscene through alternative landscaping measures.</p>	<p>Provision of street trees is implicitly being encouraged by use of the word "should", but not made mandatory. This affords developers the discretion to deviate from this encouragement when they feel it appropriate and justifiable.</p>

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
4.1 Green and Healthy Streets (p101)	11639 Hugh Firman (Calderdale MBC)	PDG149 We welcome the inclusion of trees in this section but could be broader to include other options such as shrub planting, wildflower meadows/verges and rain gardens.	The following has been inserted into para 4.1.1: <i><u>“Other landscaping could consist of shrub planting, wildflower meadows/verges and rain gardens.”</u></i>
4.1 Green and Healthy Streets (p101)	11639 Hugh Firman (Calderdale MBC)	PDG150 Paragraph 4.1.2 - Planting in groups and in planters is not the only option. Planting of larger growing, long-lived specimen trees where conditions allow has significant carbon, air quality and biodiversity benefits. An example of this is the planting of London plane at Spring Hall.	Noted
4.1 Green and Healthy Streets (p101)	11639 Hugh Firman (Calderdale MBC)	PDG151 Paragraph 4.1.2 - Recommended alternative wording "Species should be selected with consideration of their hardiness, maintenance requirements, visual amenity value, climate resilience and benefits to wildlife."	The suggested change has been made.
4.3 Connected Street Networks (p103)	11488 Penny Price	PDG36 4.3 Connected Street Networks This section could be more prescriptive. The Rochdale Canal and Aire & Calder Navigation run through the entire borough providing a safe and accessible traffic free route. Much new development is likely to take place within walking and cycling distance of this existing corridor, and new routes connecting new development to the canal should be considered and signposted. Similarly other well used routes, in the Upper Valley, the Pennine Bridle Way, packhorse routes and green ways or potential routes such as abandoned railways can be considered for increasing connectivity. Connecting to existing green spaces such as Calderdale’s important parks network should be emphasised. An image of the towpath here would be good....	This section is about streets; other networks are described in section 4.4. Para 4.4.3 states <i>“Site analysis should identify key local destinations and identify how they can be linked to important destinations within a new development.”</i> This would have the effect of using the links provided by existing active travel routes to promote connectivity with the new development.

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
4.3 Connected Street Networks (p103)	1341476 Councillor Colin Hutchinson	<p>PDG95 Avoid long straight sections of streets and incorporate other design features to encourage low vehicle speeds on residential streets.</p>	<p>It is considered that this aspect of street design is addressed by the sentence on p103: “...the street hierarchy should put the needs of pedestrians and cyclists first, rather than designing road networks which maximise traffic flows” and therefore extra change to p65 is not required.</p>
4.3 Connected Street Networks (p103)	1351410 Rebecca Hilton (Eden Planning)	<p>PDG101 Paragraph 4.3.4 states: <i>“In line with Manual for Streets guidance, the street hierarchy should put the needs of pedestrians and cyclists first, rather than designing road networks which maximise traffic flows”.</i></p> <p>We support the prioritisation of pedestrians and cyclists over vehicle movements and agree with the approach of putting the needs of these users before vehicles.</p>	Noted
4.3 Connected Street Networks (p103)	832881 Mark Jones (Barratt Homes)	<p>PDG133 We object to 4.3.4 on page 103 which states that <i>“Where vehicular routes reach a terminating space, pedestrian routes should continue beyond the space and connect to another public route or space unless there are exceptional reasons why this is not possible (e.g. topography) Cul-de-sac arrangements should generally be avoided.”</i> This goes against the principles of Secured by Design, where making a new housing estate too permeable can lead to increased risk of burglary, vehicle theft and vandalism. Plus we note that cul-de-sacs are very much a feature encouraged and accepted in the Government’s National Model Design Code Guidance Notes. We therefore ask that cul-de-sacs are actually</p>	<p>The Council believes that cul-de-sacs should be limited in number and restricted to those parts of a site which cannot be served in any other way.</p> <p>The design lends itself to walking long distances to access services and facilities, which is unattractive to older people and the less mobile, while the presence of dead ends can cause confusion and anxiety for those with dementia. The repeated nature of these layouts, with no clear distinction between areas, can also cause confusion.</p>

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		supported and accepted, rather than say that they should be avoided.	
4.3 Connected Street Networks (p103)	11639 Hugh Firman (Calderdale MBC)	PDG152 Where possible, circular routes should be created for the benefit of local residents and to help alleviate pressure on nearby wildlife sites.	The Council considers that the guidance in section 4.3 ensures as much as possible streets are interconnected and that cul-de-sac arrangements are generally avoided.
4.4 Prioritising Active and Sustainable Travel (pp104-105)	1119998 Simon Tucker (Canal & River Trust)	PDG12 Access to the Trust's towpath network could provide opportunities for people in Calderdale to improve their physical and mental wellbeing. Within section 4.4.1, we recommend that this is amended to include the provision of access to existing, as well as the provision of new, active travel routes. This could help make the document more effective in ensuring that developers and decision makers take into account the role of existing infrastructure in meeting the district's overall aims of promoting active and sustainable travel.	The Council agrees this important point should be included. Amendment to 4.4.1: "Safe and direct walking and cycling routes should be provided to encourage active travel. <i><u>This includes provision of access to existing as well as new active travel routes.</u></i> Active travel routes should be green and pleasant, with good lighting and well-overlooked by homes and other street users."
4.4 Prioritising Active and Sustainable Travel (pp104-105)	1182147 Alan Goodrum (Halifax Civic Trust)	PDG67 4.4.1 Use of appropriate materials and maintenance is also a consideration here. Our members have reported loose chip finishes to be a particular problem for cycling.	Para 4.4.5 states: "Active travel routes should be suitable for all abilities [...] surface finishes must be carefully considered." The Council does not consider a change is required in this instance.
4.4 Prioritising Active and Sustainable	1341476 Councillor Colin Hutchinson	PDG96 Encourage the provision of shelters and real-time information displays at bus-stops.	Para 4.4.9 has been amended: "New bus stops should be well-overlooked, and ideally close to key activity nodes such

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
Travel (pp104-105)			as play areas or mixed-use areas. Bus stops should be integrated into the overall public realm strategy <u>and feature shelters and real-time information displays where possible.</u>
4.6 Parking for Vehicles (pp107-109)	1119998 Simon Tucker (Canal & River Trust)	PDG13 Car parking areas have the potential to harm the character and appearance of canalside areas should they be overly prominent or visible. Section 4.6 as drafted to help minimise the general visual harm of car parking. However, we do advise that consideration could be given towards specific working to ensure that parking areas to be effectively screened from the wider public realm, including blue and green infrastructure network.	Para 4.6.5 has been amended: “Parking areas should be thoughtfully landscaped <u>and their visual impact minimised</u> , paved with a variety...”
4.6 Parking for Vehicles (pp107-109)	1351410 Rebecca Hilton (Eden Planning)	PDG103 This section refers to Calderdale’s Parking Standards within the Local Plan which details 1 space per dwelling where parking is available within the curtilage of the dwelling and highlights that lower provision of residential parking will generally be acceptable in more sustainable locations. Recognition should be given to low car ownership within the authority and active travel. Suggested modification: <i>“Applicants should refer to the Calderdale Local Plan Annex - Car and Bicycle Parking Standards, which sets out the number of spaces required for different uses. <u>Where a lesser provision is proposed, justification for this should be provided by the applicant and will be considered on a case-by-case basis.</u>”</i>	The Local Plan Car and Bicycle Parking Standards are a starting point for the Council’s expectations on parking provision, as set out at para 4.6.1. Pages 23 and 153 explains that applications should justify the occasions that proposals do not address the requirements, and so no additional wording to this effect is considered necessary in section 4.6.
5.1 Reducing Flood Risk (p113)	1350417 David Witcher	PDG48 It is hard to see the point of the well-meaning waffle about flood prevention when there is no quantification anywhere in this section about the degree of flooding to	Developments will need to be in accordance with the Flood Risk policies in the Local Plan. The Council considers that section 5.1 provides an appropriate level of guidance to

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		be avoided, or of the zones where development will not be permitted. As it stands, the section can safely be ignored by developers.	developers in relation to design and flood risk. The Flooding and Drainage SPD provides more technical information.
5.1 Reducing Flood Risk (p113)	1182147 Alan Goodrum (Halifax Civic Trust)	PDG68 Given the importance of this issue in Calderdale this section is rather vague in the sense flood risk is not defined (5.1.1) though the SuDS features are welcomed. What level of flood risk is acceptable?	Developments will need to be in accordance with the Flood Risk policies in the Local Plan. The Council considers that section 5.1 provides an appropriate level of guidance to developers in relation to design and flood risk. The Flooding and Drainage SPD provides more technical information.
5.1 Reducing Flood Risk (p113)	832881 Mark Jones (Barratt Homes)	PDG134 We object to section 5.1.3 which says “ <i>Sustainable drainage systems (SuDS) should be included as part of landscape and building design strategies from the start</i> ”. It is not always possible to incorporate SuDS within landscape strategies and therefore it will be impossible for all new development to comply with this. Furthermore, this is not a requirement in the Local Plan and is another example of the SPD seeking new requirements which legally it is not allowed to do.	The use of the word <i>should</i> indicates that SuDS are recommended and their non-inclusion should be justified. The draft Flood Risk and Drainage SPD makes reference to the course of action if it is not possible to incorporate SuDS into a scheme. Additionally, new national rules coming in 2024 will be making SuDS a requirement in most developments in England.
5.2 Access to Green Spaces (pp114-115)	11488 Penny Price	PDG37 5.2.3 Reference should be made here to Green Infrastructure. (GI)	The Local Plan Green Infrastructure policies GN1-5 are listed on p112. The following change has also been made to para 5.2.3: “Green spaces should form a connected <i>green infrastructure</i> network.”
5.2 Access to Green Spaces (pp114-115)	1341476 Councillor Colin Hutchinson	PDG99 There needs to be clarity of the arrangements for long-term stewardship of any public green spaces to accompany planning applications.	The Council considers that Stewardship is addressed through section 10.2.

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
5.2 Access to Green Spaces (pp114-115)	11639 Hugh Firman (Calderdale MBC)	PDG153 This section does not differentiate between ‘amenity green space’ and ‘natural / semi-natural green space’ which have different functions and values. The latter is crucial to well-being and biodiversity and text should be amended to encourage its creation and retention in line with Policy.	Text amended at para 5.2.4 A distinction should be drawn between green space for public amenity, designed to soften the urban fabric, provide a setting for buildings and allow for informal leisure activities, and natural / semi-natural green space consisting of land, water and geological features which have been naturally colonised by plants and animals and which are accessible on foot to large numbers of residents.
5.2 Access to Green Spaces (pp114-115) Diagram	11639 Hugh Firman (Calderdale MBC)	PDG154 Recommend change to text “everyone ideally having access to greenspace within 400m of their home” to “everyone should have access to Natural/semi-natural greenspace within 300m of their home.”	The 400m standard is contained within the adopted Local Plan.
5.3 Play and Recreation (p116)	1351410 Rebecca Hilton (Eden Planning)	PDG104 Paragraph 5.3.1 states: <i>“Applicants should identify the location and category of existing play areas in the vicinity of the proposal and demonstrate either that there is sufficient provision for all-ages play or identify how any deficit will be addressed.”</i> Up to date evidence of quality of open space would support applicants in applying this policy. It would be helpful if this policy could refer to the evidence to support applicants and for clarity for decision making. The policy also suggests ‘any’ deficit will be addressed. The policy should be clear it is only any deficit arising from a proposed development that would be proportionate for them to address. Suggested modification:	The suggested modification has been made for clarity.

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		<p><i>“Applicants should identify the location and category of existing play areas in the vicinity of the proposal and demonstrate either that there is sufficient provision for all-ages play or identify how any deficit arising from the proposed development will be addressed.”</i></p>	
5.4 Improving Access to Waterways (p117)	11488 Penny Price	<p>PDG38 Para 5.4.2. views from the tow path and canal users into the development should also be considered.</p>	<p>The Council considers that having an active frontage will improve the environment for both building occupants and towpath users. Therefore, no change to this section is necessary.</p>
5.4 Improving Access to Waterways (p117)	1349925 Jamie Furlong	<p>PDG6 The canal between Todmorden and Hebden Bridge is so dangerous at present because of the weirs. Travelling by bicycle through the weirs is honestly terrifying as you have to stand on the tiny footbridge, one foot in front of the other, carrying a bike at the same time, with a drop to the water on both sides. It is currently impossible for wheelchair users, elderly people, cyclists to use the canal as a means from A to B or even as a form of leisure between the two towns. Thank you for addressing this, and please push for accessible bridges over the weirs.</p>	<p>The matter of the side weirs on the Rochdale Canal are not within the remit of the planning system – the SPD at paragraph 5.4.3 focuses on the access to and from waterways.</p>

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
5.4 Improving Access to Waterways (p117)	1119998 Simon Tucker (Canal & River Trust)	<p>PDG11</p> <p>We believe that it is important that the document includes a section on how proposals adjacent to waterways should optimise access to, and visibility of, our waterways, this section seeks to provide.</p> <p>The Trust believe that access to our waterways can provide multiple economic, social and environmental benefits to local communities, including those living in communities in Calderdale. 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.</p> <p>The principles in section 5.4 would help to promote active surveillance and improved connectivity with our network, which could help improve the attractiveness of our network to the local community, maximising the potential benefits above.</p> <p>We wish to highlight that the existing Local Plan document does not specifically address waterside development, and we believe that section 5.4 of the document could help address this deficiency, providing more certainty to developers on how to address waterside locations.</p> <p>Whilst the approach of promoting active frontages is encouraged, we wish to highlight that this default approach may not suit all sites, notably industrial or infrastructure development where the due prominence of features including plant, outside storage or HGV loading areas could result in harm to the character of our network. As a result, we request that consideration is</p>	<p>The suggested change has been made with the following additional paragraph on p117: <u>“In cases where active frontages cannot be formed without resulting in harm to the amenity of the waterway, such as for functional infrastructure, outside storage or industrial uses, consideration could be given to the formation of robust planting (utilising native species) to help screen the development from the canal.”</u></p>

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		<p>given to a separate paragraph within section 5.4 to address situations where active frontages cannot be formed. The formation of robust landscape buffers could be more appropriate in these situations. Example wording is provided below: <i>“In cases where active frontages cannot be formed without resulting in harm to the amenity of the waterway, such as for functional infrastructure, outside storage or industrial uses, consideration could be given to the formation of robust planting (utilising native species) to help screen the development from the canal.”</i></p>	
5.5 Enhancing Biodiversity (pp118-119)	1351410 Rebecca Hilton (Eden Planning)	<p>PDG105 Paragraph 5.5.5 states: <i>Green verges should be provided within the public realm to aid definition of the street, create a green and attractive place, provide habitat and ecological benefits, and help attenuate and store surface water runoff.</i> We consider the inclusion of green verges should reflect the street hierarchy, with green verges more typical along primary routes but less so on secondary or tertiary routes. Suggested modification: <i>Green verges should be provided within the public realm to aid definition of the street, create a green and attractive place, provide habitat and ecological benefits, and help attenuate and store surface water runoff, <u>with regard to street hierarchy.</u></i></p> <p>Paragraph 5.5.6 states: <i>50% of new dwellings should include bird or bat boxes, in line with CMBC guidance. Such features should be integrated into the fabric of the buildings wherever</i></p>	<p>The Council considers that the approach the draft SPD takes is justified, in line with the Green and Healthy Streets principles explained in section 4.1. Green verges would apply in this regard to all rather than only primary routes. Therefore, no change has been made to the text.</p> <p>The use of the word <i>should</i> indicates that that this is recommended and their non-inclusion should be justified. The starting</p>

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		<p><i>possible so that they are less visually intrusive, more durable, and less likely to be removed by future homeowners.</i></p> <p>The 50% requirement needs to be proportionate. With legislation requiring biodiversity net gain (BNG) a site by site provision and enhancement of biodiversity will be required and this proportion of bird and bat boxes is considered unreasonable. We recommend that this is removed.</p> <p>Suggested modification: 50% of new dwellings should include bird or bat boxes, in line with CMBC guidance. Such features should be integrated into the fabric of the buildings wherever possible so that they are less visually intrusive, more durable, and less likely to be removed by future homeowners.</p>	<p>point is Local Plan policy GN3a and d and is additional to BNG requirements. Guidance is published here: Guidance on the Provision of Bat Roosting and Bird Nesting Features in Buildings (calderdale.gov.uk)</p>
5.5 Enhancing Biodiversity (pp118-119)	11488 Penny Price	<p>PDG39</p> <p>There is no mention of hedges, either mixed native or formal, and their importance for biodiversity as habitat and reinforcing wildlife connectivity.</p> <p>There is no mention of species rich grassland and the many forms these can take e.g.:</p> <ul style="list-style-type: none"> • Species rich lawns: low growing grass which is mown through the summer but sown with low growing species which can flower; • Meadow areas: longer grass areas mown once or twice a year, the opportunity to provide an interesting contrast between close mown grass, e.g. as paths through longer grass, known as differential mowing. <p>Lighting design is not mentioned, this can be designed to benefit wildlife, e.g. by sighting appropriately, using cut</p>	<p>The detailed approach to biodiversity is set out in the draft Biodiversity Net Gain SPD. In addition, the Council's ecologists will provide detailed comments in relation to the planting of hedges etc through the planning application process.</p>

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		off lighting, not using up lighting where it might cause disturbance.	
5.5 Enhancing Biodiversity (pp118-119)	1246930 Woodhouse Residents Association	PDG119 In the BNG section (Pages 118/119) reference should be made to the guidance on how larger, phased development sites will be dealt with. This could be 'sign-posting' to the relevant document.	Agreed – text added to refer to BNG SPD.
5.5 Enhancing Biodiversity (pp118-119)	832881 Mark Jones (Barratt Homes)	PDG135 On page 119, in section 5.5.6 it says that “ <i>50% of new dwellings should include bird or bat boxes, in line with CMBG guidance</i> ”. First of all, the Local Plan does not set such a requirement. Secondly, through our experience this would not be the best approach for every site. Rather than stipulating a very rigid requirement, it would be better for the guidance to achieve the same or in some instances an even greater ecological benefit, by asking for a ratio of 1 feature per 2 dwellings. This will then enable developers to pick the best solution on a site by site basis. For example, it might be more beneficial to put a number of features in the same houses located on a particular edge of the site or within an on-site or off-site BNG area.	The use of the word <i>should</i> indicates that that this is recommended and their non-inclusion should be justified. The starting point is Local Plan policy GN3a and d and is additional to BNG requirements. Guidance is published here: Guidance on the Provision of Bat Roosting and Bird Nesting Features in Buildings (calderdale.gov.uk)
5.5 Enhancing Biodiversity (pp118-119)	11639 Hugh Firman (Calderdale MBC)	PDG155 Paragraph 5.5.1 - Suggest replace 'landscape features' with 'wildlife habitats'.	The suggested amendment has been made.

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
5.5 Enhancing Biodiversity (pp118-119)	11639 Hugh Firman (Calderdale MBC)	PDG156 Paragraph 5.5.1 - 'General green infrastructure networks' should be more specific and also reference made to the emerging LNRS.	The following change has been made to para 5.5.1: "Proposals must be developed with regard to the Calderdale Wildlife Habitat Network, <u>Local Nature Recovery Strategies</u> , Habitats of Principal Importance and general green infrastructure networks."
5.5 Enhancing Biodiversity (pp118-119)	11639 Hugh Firman (Calderdale MBC)	PDG157 Paragraph 5.5.1 - Replacement habitats should be in-keeping with the site and adjacent habitats (could reference landscape characters areas) and appropriate to compensate for any habitats lost. Enhancement not transformation of the natural environment is encouraged.	The final sentence para 5.5.1 has been changed to the following: "Replacement habitats should be in keeping with the site and adjacent habitats and appropriate to compensate for any habitats lost."
5.5 Enhancing Biodiversity (pp118-119)	11639 Hugh Firman (Calderdale MBC)	PDG158 Paragraph 5.5.2 - This paragraph seems to apply to wetlands not orchards - although it is agreed they do contribute to biodiversity as do other types of habitat and it is not clear why they have been isolated here	Text amended to clarify the paragraph is referring to both.
5.5 Enhancing Biodiversity (pp118-119)	11639 Hugh Firman (Calderdale MBC)	PDG159 Paragraph 5.5.2 - It is not necessary for wetlands designed for wildlife to be always "well overlooked" particularly if they are designed to be safe.	Suggested change made
5.5 Enhancing Biodiversity (pp118-119) Small scale biodiversity diagram	11639 Hugh Firman (Calderdale MBC)	PDG161 Paragraph 5.5.2 - Perhaps this should be excluded or amended. What does 'left blank' mean? Is a species rich grassland 'left blank'? 'Tree and shrub planting' is not always the best option for biodiversity'. Also, the right hand example shows little biodiversity value. (We don't like this!)	The suggested change has been made. The image for the positive example has been replaced.

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
5.5 Enhancing Biodiversity (pp118-119)	11639 Hugh Firman (Calderdale MBC)	<p>PDG160 Paragraph 5.5.3 - Question what this term refers to - there should not be an "incidental space" in a well designed scheme.</p> <p>In addition, whilst we agree blank closely mown amenity grass is not desirable, we have concerns this paragraph may promote areas which should be left for functional ecological reasons (such as scrub) to be "over engineered" as to avoid "blank spaces".</p>	<p>The word 'incidental' has been removed from para 5.5.3.</p> <p>It is considered that the overall thrust of the section would avoid such scenarios.</p>
5.5 Enhancing Biodiversity (pp118-119)	11639 Hugh Firman (Calderdale MBC)	<p>PDG162 Paragraph 5.5.5 - Could this reflect some of the minimum sizes in the BNG SPD for areas specifically for biodiversity provision? In many cases 2x1m would not be acceptable to provide any benefits for biodiversity.</p>	Text amended to 'disparate small parcels' to accord with BNG SPD.
5.6 Existing Trees and Woodlands (p120)	11488 Penny Price	<p>PDG40 Para 5.6.3 Trees on and adjacent to sites must be protected from new development. The following phrase should be amended: <i>Note that on <u>smaller sites</u>, development may have an impact on trees immediately outside the site boundary.</i></p> <p>This should read: <i>Note that on any site, development may have an impact on trees immediately outside the site boundary.</i></p>	The suggested change has been made.
5.6 Existing Trees and Woodlands (p120)	1351410 Rebecca Hilton (Eden Planning)	<p>PDG107 Paragraph 5.6.1 states: <i>"Proposals should seek to retain existing trees and hedgerows wherever possible."</i> We support the inclusion of 'wherever possible' as this allows for some tree loss, for example to facilitate access, and also recognition of less valuable trees and hedgerows that do not warrant retention.</p>	Noted.

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
5.6 Existing Trees and Woodlands (p120)	11639 Hugh Firman (Calderdale MBC)	PDG163 Paragraph 5.6.3 - Could we also refer to BS42020 Biodiversity – Code of Practice for Planning and Development and BS 8683: Process for designing and implementing biodiversity net gain within the Biodiversity sections as well?	These documents have been added to the references section on p160.
5.6 Existing Trees and Woodlands (p120)	1246930 Woodhouse Residents Association	PDG119 The reference to Veteran trees appears to have been removed on page 120 at 5.6.1. This was supported in the consultation process by our representative. We refer to the requirements of NPPF which states in Para 186 (c) :- <i>development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists;</i> Reference to the requirements for veteran trees must be included to ensure the protection of this scarce resource in line with NPPF. These are not always part of woodland areas and can be individual trees.	The reference to veteran trees has been reinstated in para 5.6.1: <i><u>“Veteran trees may be identified through survey, these must be retained with an increased buffer responding to their enhanced RPAs.”</u></i>
5.7 Community Growing Spaces (p121)	1351410 Rebecca Hilton (Eden Planning)	PDG108 We support the inclusion of community growing space but there should be a recognition that small areas may be most appropriate and a ‘secure base’ may not be appropriate. Suggested modification: <i><u>“Where space allows, a secure building/structure should be provided to store communal tools and supplies, as well as acting as a base for coordinating activities and holding educational events. Space should also be provided for communal social activities eg. BBQs and tables with benches, where space allows.”</u></i>	The suggested change has been made.

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
5.7 Community Growing Spaces (p121)	1246930 Woodhouse Residents Association	<p>PDG119 At page 121 our representative supported communal growing being considered as part of the Landscape Strategy. This has now been removed from the text. We request that communal growing should be considered as part of the Landscape Strategy. This is to ensure the location of communal growing is appropriate (ie not on steeply sloping land or adjacent to ancient woodland), it is not located as an afterthought or on land that is spare.</p>	Text has been amended to include reference to considering communal growing spaces in the Landscape Strategy Amended in 5.7.1
5.7 Community Growing Spaces (p121)	832881 Mark Jones (Barratt Homes)	<p>PDG136 Page 121 is confusing as the first paragraph says “<i>Community growing spaces should be incorporated into all new public space <u>where possible</u></i>”. However, the paragraph which immediately follows it at section 5.7.1 says “Opportunities for local food production should be included in major applications, along with proposals for how they will be managed”. These two paragraphs contradict each other, but we suggest not insisting on this provision for any housing development, including all housing sites of 10 dwellings or more.</p> <p>There are a number of reasons as to why this will not be practical on every site such as:</p> <ul style="list-style-type: none"> - Somebody other than the management company will need to take ownership of it and manage it. Not everyone will want to be involved in growing local food production and therefore will not be willing to pay annual management fees towards this. Thus, it will rely on a third party local to the site taking this on. - Ground conditions 	The Council considers there is sufficient flexibility in the draft SPD that reflects the use of the word ‘should’ rather than ‘must’.

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		<ul style="list-style-type: none"> - Access - Water supply - Security - Ancillary structures - Parking <p>It is therefore imperative that this is something which is encouraged where feasible, rather than a must for every major planning application of 10 dwellings or more.</p>	
5.8 Views to Open Countryside (p122)	832881 Mark Jones (Barratt Homes)	<p>PDG137</p> <p>We object to section 5.8.2 on page 122 which says that “<i>streets and buildings should be orientated to optimize open views to the countryside, or create views to closer open space and greenery.</i>” Whilst it is possible to have new homes fronting towards on-site public open space where feasible, it is impossible to insist on streets and buildings to face open views to the countryside. A number of factors will determine whether this is possible including topography and street design. Often both of these factors combined have a huge implication on how a new housing development is designed and laid out. Along with many other factors such as both existing and future constraints. Once again, we ask that this is something that is encouraged where feasible but not essential.</p>	The recommendations on p122 come under the heading of “Streets and buildings should:”, which is defined to be not mandatory on p22.
6.1 Places for People (p125)	1351410 Rebecca Hilton (Eden Planning)	<p>PDG109</p> <p>Paragraph 6.1.1 states: “<i>Streets and spaces should be places to meet - places that are safe, attractive and accessible to people of all abilities.</i>”</p> <p>We recognise that streets can, in some instances serve a function as a space to meet; however, this is not typical</p>	The Council would aspire for streets to be designed for people rather than vehicles and 6.1.1 in the draft SPD is consistent with this aspiration. In addition, the Local Plan at paragraph 16.5 sets out that the Council implements an approach that follows the hierarchy of transport users as follows:

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		<p>and is largely constrained to wider boulevards or pedestrianised streetscapes within towns. The suggested modification is for 6.1.1 to be removed or reference to streets be removed from this paragraph as this is adequately covered in the following paragraphs.</p>	<ul style="list-style-type: none"> • Pedestrians, people with disabilities and emergency services • Cyclists and horse riders • Public transport passengers including taxis and private hire • Motorcyclists • Freight movements including deliveries to local areas • Private cars
6.2 Inclusive Design (p126)	1341481 Steven Heywood (Yorkshire Sport Foundation)	<p>PDG73 A piece of research was undertaken at Yorkshire Sport in collaboration with Women in Sport and Make Space for Girls. It looks at 3 case study parks and accessibility and usage by teenage girls and young women. The document contains some interesting results in terms of feedback from the consultation groups as well as stakeholders, enabling physical activity for this demograph, what would make a more accessible space to enable physical activity and looking at three distinctly different community parks. https://www.yorkshiresport.org/what-we-do/data-insight/make-space-for-us/</p>	Noted - the SPD has been influenced by this and other design guidance listed on page 11.
6.3 Community Safety (p127)	1119998 Simon Tucker (Canal & River Trust)	<p>PDG14 The presence of tall fences or other solid tall boundary features has the potential to decrease public surveillance of our spaces, which can encourage anti-social behaviour and decrease the feeling of safety on our network. Within section 6.3, there is potential to add a paragraph or additional text to 6.3.1 to advise that solid tall boundary treatments should be avoided next to public spaces. This could make the document more effective in ensuring that surveillance of the wider public realm,</p>	<p>The following wording has been appended to para 6.3.2: <u>“Solid, tall boundary treatments next to public spaces should be avoided.”</u></p>

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		including the green and blue infrastructure, can be maximised.	
6.3 Community Safety (p127)	11488 Penny Price	<p>PDG41 Para 6.3.4 Inappropriate use of lighting in rural area must be avoided. Lighting should be designed to be appropriate for the use, e.g. domestic properties should not be lit to industrial levels of brightness. Consideration shall be given to limiting glare and creating light pollution which is damaging for wildlife and those wanting to appreciate the night sky in rural areas.</p>	6.3.4 states that the lighting design should be sensitive to the character of a place.
7.1 Good Mix of Housing Types (p129)	1351410 Rebecca Hilton (Eden Planning)	<p>PDG110 Paragraph 7.1.2: <i>“Affordable housing should be provided in line with policy requirements as a minimum, although provision above this threshold will be welcomed.”</i> We welcome this position and would suggest any provision that exceeds the policy position should be considered as a benefit in the planning balance. Suggested modification: <i>“Affordable housing should be provided in line with policy requirements as a minimum, although provision above this threshold will be welcomed <u>and considered by the decision maker as a planning benefit. The appropriate mix of affordable housing will be determined on a case by case basis responding to local needs.</u></i> At 7.1.3 it is considered that small clusters of affordable housing pepper potted around the site should be permitted to ensure ease of management by Registered Providers. Suggested modification:</p>	<p>Noted</p> <p>Text updated to read '<u>For further information please refer to the Affordable Housing SPD</u>'.</p>

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		<p><i>“Tenure blind development is where there are no significant, discernible differences between houses of different tenures in relation to external detailing and use of materials. This approach encourages the development of a greater sense of community. Although small clusters of affordable housing will be permitted.”</i></p>	
7.1 Good Mix of Housing Types (p129)	832881 Mark Jones (Barratt Homes)	<p>PDG138 We are generally supportive of this, however we object to section 7.1.3 which says <i>“affordable homes should be well-distributed throughout a larger development and be designed to be tenure blind”</i>. The latter part requiring affordable housing to be tenure blind is fine and is something which has been taking place for a number of years now. Thus, it does beg the question as to why the affordable homes then need to be well distributed throughout a larger development. If new affordable homes are designed to be tenure blind, then there is no need to then ask that they are spread across a site. What is the justification for this? All it does it present a management issue for the registered provider who has to maintain and deal with enquiries from tenants. Furthermore, it can create tension and problems between both private and rented owners. We therefore ask that the requirement to pepper pot the affordable homes is deleted and instead further reinforce the need for homes to be tenure blind.</p>	<p>Amend 7.1.3 text to read as follows: <u><i>‘Affordable Housing should be well distributed and indistinguishable from market housing.</i></u> <u><i>The Affordable Housing SPD provides more details on delivery and distribution of Affordable Housing’.</i></u></p>
7.2 Mixed Uses (p130)	1351410 Rebecca Hilton (Eden Planning)	<p>PDG111 Paragraph 7.2.1 states: <i>“Applicants should assess the range of facilities and services available in the local area and identify shortcomings in provision.”</i></p>	The suggested amendment to para 7.2.1 has been made.

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		<p>Applicants should not be required to address an existing lack of provision of community facilities and services as part of their development, only the potential impacts generated by the proposals. Suggested modification: <i>“Applicants should assess the range of facilities and services available in the local area and identify shortcomings in provision, <u>that may occur as a result of the proposed development.</u>”</i></p> <p>At 7.2.4 we suggest the removal of the word <i>any</i> so that the required mitigation is proportionate and linked to the proposed development. Suggested modification: <i>“Applicants should demonstrate that the design of mixed-use buildings contributes positively to the character of the area, and successfully mitigates any impacts on surrounding dwellings.”</i></p>	<p>The suggested amendment to para 7.2.4 has been made.</p>
7.2 Mixed Uses (p130)	1246930 Woodhouse Residents Association	<p>PDG119 The diagram at page 130 is not understandable. Text needs to explain what the 400m relates to.</p>	<p>The diagram has been amended to show that the 400m distance is equivalent to a 5-minute walk.</p>
8.1 High Quality Homes (p133)	1182147 Alan Goodrum (Halifax Civic Trust)	<p>PDG69 Illustration (also the one on page 109), looks like a product of the Essex Design Guide as was. Local Examples?</p>	<p>Various images throughout the SPD have been updated from the consultation draft.</p>
8.1 High Quality Homes (p133)	1341476 Councillor Colin Hutchinson	<p>PDG100 I strongly support the final sentence of section 8.1.1 Please can that be emphasised. In section 8.1.3 can it be suggested that consideration be given to well-designed basements to promote the flexible use of space within dwellings.</p>	<p>The point about para 8.1.1 is noted. Para 8.1.3 has been appended: <i>“<u>Consideration may also be given to the inclusion of basements to provide further flexible space.</u>”</i></p>

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
8.1 High Quality Homes (p133)	1351410 Rebecca Hilton (Eden Planning)	<p>PDG112</p> <p>Paragraph 8.1.1 states: <i>“New homes should have a strong and distinctive style which is nevertheless recognisably of Calderdale.”</i></p> <p>It is unclear how this would be applied and what the decision maker would be looking for in a design to satisfy it being “recognisably of Calderdale”, particularly when the image is of a scheme in Essex.</p> <p>Suggested modification: <i>“New homes should have a strong and distinctive style which is nevertheless recognisably of Calderdale responds to the local context.”</i></p>	The suggested amendment has been made.
8.2 Healthy Homes and Buildings (p134)	1351410 Rebecca Hilton (Eden Planning)	<p>PDG113</p> <p>Paragraph 8.2.2 states: <i>“Proposals must adhere to the privacy distances set out in Appendix 2 of the Calderdale Local Plan.”</i></p> <p>The distances set at Annex 2 are guidance and not policy. Whilst we agree that separation distances are important to secure a suitable level of privacy there are instances when a lesser distance will be appropriate. This is why the distances are guidance. We suggest the SPD should recognise this explicitly.</p> <p>Policy BT2 of the Local Plan does not explicitly refer to the guidance at Annex 2. The supporting text states: <i>Supporting guidance to assist in the determination of development proposals and the application of the Policy is included as Annex 2 'Space About Dwellings'.</i></p> <p>Suggested modification: <i>“Proposals must <u>should</u> adhere to the privacy distances set out in Appendix Annex 2 of the Calderdale Local Plan, <u>unless there are development specific reasons why a lesser distance is appropriate.</u>”</i></p>	The suggested amendment has been made.

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
8.3 Outdoor Space (p135)	11488 Penny Price	<p>PDG42 Para 8.3.5 <i>The boundaries between private, communal, and public outdoor spaces should be clearly defined, generally with high quality boundary treatments such as walls and fences and where appropriate hedges.</i></p> <p>Fences are inappropriate along main frontages and at the interface between new development and countryside.</p>	<p>The following amendment has been made: “The boundaries between private, communal, and public outdoor spaces should be clearly defined, generally with high quality boundary treatments such as walls and fences and where appropriate hedges.”</p>
8.3 Outdoor Space (p135)	1351410 Rebecca Hilton (Eden Planning)	<p>PDG114 This states: 8.3.1 <i>All homes should have easy access to some form of private external amenity space unless a suitable alternative communal space of better quality can be provided nearby.</i> 8.3.2 <i>Gardens should be of a usable shape and appropriately sized for the expected number of people in a dwelling.</i></p> <p>We agree that all homes should have access to some form of external amenity space. However, we disagree with 8.3.2 as there will be instances where family homes could be designed to have a compact and low maintenance private amenity space but are within close proximity to usable public open space. Our suggestion is that the amenity space areas are clearly marked as ‘guidance’ and it is clear there could be exceptions. For example bungalows for older people or affordable homes may be best designed with smaller private amenity spaces and access to larger areas of public open space. Suggested modification: <i>“Gardens should be of a usable shape and appropriately sized for the expected number of people in a dwelling, unless a more compact private amenity space</i></p>	<p>The Council considers that the policies in the Local Plan and this SPD are appropriate and would expect new homes to have outside amenity space. Any departure from this would need to be justified.</p>

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		<u>can be justified due to accessibility to wider public open space.</u>	
9.0 Resources (pp136-141)	11488 Penny Price	<p>PDG43 Reference should be made to local design guides such as the Todmorden Design Handbook</p> <p>Green Infrastructure Framework published by Natural England in 2023 should be included.</p> <p>NCA 36 South Pennines, NCA 37 Yorkshire Pennine Fringe Natural England</p>	The documents suggested have been added to A2 'References to other guidance',
9.1 Retrofit First (p137)	1182147 Alan Goodrum (Halifax Civic Trust)	<p>PDG70 There is a better hospital conversion example already in Halifax (former Infirmary Free School Lane, Grade II listed) than the one chosen in the illustration</p>	Noted – image included to address this.
9.1 Retrofit First (p137)	1351410 Rebecca Hilton (Eden Planning)	<p>PDG115 This states: <i>Proposals should re-use and improve existing buildings where possible in preference to demolition, to conserve existing heritage assets and reduce carbon emissions.</i></p> <p>We understand Council's desire to encourage re-use of existing buildings. We recognise the policy clearly states 'where possible' and we support this inclusion. There will be robust reasons relating to viability, design and general condition amongst other development specific matters that will mean it is most appropriate for a building or cluster of buildings to be demolished.</p>	The suggested amendment has been made.

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		<p>It is appropriate that demolition is justified and the level of detail needed should be proportionate. We feel the inclusion of “...loss of any building of substantial construction that could be integrated into a scheme will be resisted” should allow for some exception where there is clear justification.</p> <p>Suggested modification: <i>“Retrofit first principles mean following the assumption that any building on a site will be reused. Consideration will be given to the importance of placemaking in the context of proposals, particularly if demolition of ancillary, poor quality and temporary structures is justified; however, loss of any building of substantial construction that could be integrated into a scheme will be resisted, unless there is clear justification for the loss.”</i></p>	
9.2 Energy Performance (p138)	1351410 Rebecca Hilton (Eden Planning)	<p>PDG116 This states: <i>“Proposals must be designed to maximise their energy performance, to reduce environmental impact and make buildings which are more comfortable and efficient to run.”</i></p> <p>Energy performance is an important topic and energy efficiency is central to housebuilders design process. It is considered maximising energy performance is a high bar generally constrained by budget but also the need to meet housing requirements for example it is recognised bungalows are not the most energy efficient yet there is a local identified need.</p> <p>This is also not reflective of later paragraphs in the section which require proposals to meet Building Regulations standards but goes on that the “targeting of higher standards will be welcomed”.</p>	The Council considers the approach in the draft SPD is appropriate and reflects the importance of energy performance whilst avoiding going further than the Local Plan or Building Regulations.

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		<p>Suggested modification: <i>“Proposals must be <u>are encouraged to be</u> designed to maximise their energy performance, to reduce environmental impact and make buildings which are more comfortable and efficient to run. <u>Local housing needs will be recognised in the application of the policy as less efficient house types may be required to meet local need but may in turn not ‘maximise’ the efficiency of the proposed development.</u>”</i></p>	
9.2 Energy Performance (p138)	832881 Mark Jones (Barratt Homes)	<p>PDG139 We object to section 9.2.2 on page 138 which states that <i>“the design of buildings should maximise opportunities for passive energy gains, while including measures to limit overheating from afternoon summer sun”</i>. First, there is no policy requirement that insists on new development meeting passive energy standards. Secondly, there is other legislation in place via building regulations to deal with overheating. Thus, we request that this paragraph removes the word “should” and instead ask developers to consider these points rather than insist on them being met.</p>	<p>The recommendations on p138 uses the word “should:”, which is defined to be not mandatory on p22. However, the Council takes the point that passive energy gains may be outside the scope what this design guide should be expecting. The following amendment has therefore been made to para 9.2.2: <i>“The design of buildings should <u>is encouraged to</u> maximise opportunities for passive energy gains, while including measures to limit overheating from afternoon summer sun.”</i></p>
9.3 Sustainable Construction (139)	832881 Mark Jones (Barratt Homes)	<p>PDG140 Our only comment on page 139 is that this is a very good example which should be followed throughout the document and in particular with regard to the areas of concern raised in our letter. For example the headings for sections 9.3.2 and 9.3.3 seek certain matters to be looked at with a caveat saying <i>“wherever possible”</i> or <i>“where possible”</i>. We feel that this approach can be incorporated in to other areas of the SPD and could actually address many of the concerns we have set out in this letter.</p>	Noted

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
9.4 Renewable Energy (p140)	1119998 Simon Tucker (Canal & River Trust)	<p>PDG15</p> <p>The general aim of this guidance, which seeks for new developments to consider the use of low carbon energy sources, would help to ensure that the Local Plan addresses the aims of the National Planning Policy Framework (NPPF) to address the challenge of climate change, including aims to promote the use of renewable and low carbon energy and heat.</p> <p>Due to the nature of Calderdale, with steep sided valleys and numerous water resources, we believe that this section of the document could be more effective if the descriptive text provided examples of low carbon energy sources beyond PV panels, air and ground source heat pumps, to help signpost developers and decision makers to examples they may wish to consider that could be viable in the local area. Specifically, water source heat pumps and the use of micro hydroelectric generation could be feasible in the local area. Reference to these options could be included in paragraph 9.4.1.</p> <p>Without such signposting, there is a risk that certain feasible options for low carbon energy generation may not be considered during the assessment and decision phase.</p> <p>As an example of a low carbon energy source, water from our waterways may be used for heating and cooling new developments. The water flowing through our waterways contains enough thermal energy to produce approximately 640 MW of energy nationwide, and we believe can make a contribution towards the needs of Calderdale. The Trust wish to highlight that water resources from our network are commonly used for active cooling and heating solutions in new developments, including the use of water source heat</p>	Para 9.4.1 has been amended to include reference to water source heat pumps and micro hydro electric energy generation.

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		pumps, which can be more efficient than air source alternatives.	
9.4 Renewable Energy (p140)	832881 Mark Jones (Barratt Homes)	PDG141 We object to section 9.4.1 which states that “ <i>Gas will not be permitted</i> ”. The Government were going to insist on this from 2025 but has since retracted this date, due to the evidence before them which demonstrates why this will not be feasible from next year onwards. Furthermore, there is no requirement for this in the Local Plan and should be left to non-planning legislation via building regulations. It is not appropriate for an SPD to stipulate this and therefore request that this is removed from the document.	The following amendment has been made to para 9.4.1: “Low emission energy generation should be used for space heating, hot water, and electricity (including electric vehicle charging). Gas will not be permitted <u>discouraged</u> .”
9.5 Water Saving (p141)	1341476 Councillor Colin Hutchinson	PDG102 There needs to be as much separation of surface water drainage and foul water drainage as possible, with separate drainage systems at least until pipes leave the curtilage of the development site. Drainage of surface water into a main sewer needs to be a last resort.	Noted.
10.0 Lifespan (pp142-145)	1182147 Alan Goodrum (Halifax Civic Trust)	PDG74 Paragraph 10.1.1 - A characteristic of the area is that buildings have been made of durable materials such as stone and have a long lifespan - 100 years is not exceptional. What is meant by 'designed to last'? 100, maybe 200 years? As well as sustainability, aesthetic considerations there is a financial aspect given ever lengthening mortgages..	The Council considers that the term 'designed to last' refers to an indefinite amount of time, and also acknowledges that many buildings will have different uses over their lifetime.

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
10.1 Adaptable Buildings and Plots (p143)	1350417 David Witcher	PDG49 This section has no useful purpose without addressing the quantification of planned lifespan.	The Council considers that the term 'designed to last' refers to an indefinite amount of time, and also acknowledges that many buildings will have different uses over their lifetime.
10.1 Adaptable Buildings and Plots (p143)	1351410 Rebecca Hilton (Eden Planning)	PDG117 We suggest this policy should be amended so that adaption is encouraged but not required as it may not always be possible or appropriate. Suggested modification: <i>"Buildings must should be designed with consideration for how they might be adapted over time to suit new uses or requirements and minimise the need for wasteful demolition in the future."</i>	The Council considers it is a reasonable requirement for developers to give consideration to future adaptation. If this has been considered and the conclusion is that it would not be possible or appropriate, the Council and applicant may come to an agreement on what course of action to take.
10.3 Participation in Design (p145)	832881 Mark Jones (Barratt Homes)	PDG142 We object to section 10.3.3 which says that " <i>The developers of large, phased developments should undertake post occupancy evaluation with residents after each phase is occupied, to assess building performance and user satisfaction.</i> " This is introducing a new requirement which is not part of the Local Plan. Nor is it planning related. In any event, major housebuilders carry out their own testing and research on new technologies plus building control will ensure that certain methods are appropriate and built to satisfaction. We therefore request that this paragraph is deleted from the SPD.	The following amendment has been made: "The developers of large, phased developments should <u>are encouraged to</u> undertake post occupancy evaluation with residents after each phase is occupied, to assess building performance and user satisfaction."
The planning application process (pp148-149)	1341476 Councillor Colin Hutchinson	PDG106 I represent a ward which includes six Conservation Areas. Please can reference be made to the place of Lawful Development Certificates as a means of verifying the acceptability of minor developments: when should they be used and when are they unnecessary. Could this	An explanation of Lawful Development Certificates has been inserted in p148.

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
		be described as clearly as possible, because the whole section on when Planning Permission is not required is quite vague on Calderdale's website.	
Part D – Submitting an Application (pp148)	1351380 Andrew Rose Spawforths	<p>PDG71 The section “Part D Submitting an Application” provides information on the material needed to support a planning application. However, the explanation and information provided does not recognise or explain that there are different approaches to a planning application and appears to only show the detail for a Full Application. However, schemes could come forward in Outline, or Full or Hybrid (part outline/full). For an Outline application less detail is needed, and less plans, and most design matters would be deferred for Reserved Matters and might be set out in Parameters Plans.</p> <p>Keyland consider this section should be clarified and adjusted to recognise the different approaches to securing planning permission.</p>	A section explaining different types of planning applications has been inserted on p148.
Pre-application meetings and design reviews (p150)	1182147 Alan Goodrum (Halifax Civic Trust)	<p>PDG75 The design review process is not transparent. How do you get involved/get in touch? How are their findings communicated?</p>	It is considered that the existing Design Review paragraph provides all the broad information needed on this topic. Applicants unsure whether they need a DR should check with Planning Services as soon as they can. The Council will be able to make any necessary connections between developers and bodies which undertake Design Review, the findings of which should be included in the planning application.

Consultation point	Consultee	Comment	Council response and SPD amendment (where applicable)
A.2 References to further guidance (pp160-161)	11488 Penny Price	<p>PDG46</p> <p>The following is an invaluable resource for selecting trees for specific areas / uses: https://www.tdag.org.uk/tree-species-selection-for-green-infrastructure.hi Produced by the Trees and Design Action Group 2019</p>	Noted
A.2 References to further guidance (pp160-161)	1182147 Alan Goodrum (Halifax Civic Trust)	<p>PDG76</p> <p>Reference to current and proposed SPDs would be helpful in this section.</p>	The suggested change has been made.