

Hebden Bridge Partnership draft action plan: response from Anthony Rae

This is a personal submission but it draws on the response Friends of the Earth made to Calderdale council's Preferred Options consultation for its developing local plan Core strategy. It's in two parts: first some comments on strategic context and balance, and then on the detail of the draft's 39 proposals.

A) The process and its relationship to the Calderdale Local Plan

We like to commend the Partnership on both this initiative and the quality of its draft Action Plan (AP). In the context of the government's new planning framework (of which FOE has been substantially critical) we have been cautious about the apparent new opportunity for neighbourhood planning, preferring instead to emphasise the primacy of the local plan and the need to ensure that this applies an overall and detailed commitment to sustainability, to which any neighbourhood plan would be to be in conformity. The process has been the subject of some criticism on Hebweb - indeed there have been calls for the document to be withdrawn - which I think have been unfair so should not be heeded. I have previously mentioned including to the Town Council where statutory responsibility for neighbourhood planning has to reside - and am pleased this is now well understood - which in Hebden is a significant point in view of the Garden Street experience, where a collective UCVR masterplanning process was capable of being transmuted into something quite frightening to the town's future. This merely emphasises an important starting point: **to be clear about the strategic purposes of any neighbourhood planning exercise, and what needs to be secured at the Local Plan level as much as in a subsidiary neighbourhood plan.** Consequently I would suggest that the Partnership process and its AP incorporates stronger reference and linkage to the Calderdale core strategy, either supporting/ reinforcing elements which it judges will be beneficial - and maybe also opposing those which it thinks will be not - or adding more detailed or different local variants which the local plan cannot encompass. This will involve taking a view on the area based text and policy for Hebden Bridge in the preferred options document pages 210-14, its Spatial Vision and Policy HB1; but also on the preceding sectoral policies, which is a more daunting task. For your information the FOE response is enclosed. It might be helpful if the Action Plan were to formally indicate its view on the Hebden Bridge policies.

B) The balance between 'means' and 'ends', between strategic themes and specific proposals

At the moment the emphasis in the Action Plan is on its 39 proposals - with a few more interleaved in between - which are a mixture of different types and sizes; and very often these will be means to an end, rather than ends in themselves. It is suggested that, for the AP to be properly underpinned by a longer term strategy, **it needs to identify a smaller number of strategic themes which will serve to integrate its approach by linking together and creating synergies between individual proposals, and to provide overall direction.**

What follows is not a list of what those 'strategic themes' might be but instead some questions to inform a discussion from which they can then be elucidated collectively. These strategic themes would then provide a stronger, and maybe revised, structure for the AP, so that individual proposals 5-8, 14 and 17 (examples) could all be seen and grouped or colour-coded to be contributing to strategic theme X. Within the questions however there is repeated emphasis on the spatial dimensions of planning - which have I think been overlooked - as well as sustainability and climate change as policy drivers, and the need for greater prioritisation but also realism in recognising how the coming decade will be different from the apparent optimism that benefited the town in the years before the bubble burst.

Q1: 'What should be the spatial strategy for the town or the plan? What are the spatial threats and opportunities?': This first question is probably the biggest, and it's apparent that some individual proposals are merely the surface expression of bigger spatial threats and opportunities.

(i) There are many aspects to it, starting with the issue of 'Large Sites'. Whilst Proposal 18

mentions the former fire station site, and the Browns site is also referred to (page 11) it's an apparent paradox that, in a town apparently significantly restricted by the absence of large flat sites, these are in fact substantial in both number and area but as expected also encumbered by constraints. The list would include: Brown site (the Western Gateway, restricted by apparent flooding threat), Mayroyd (the Eastern Gateway, now Green Belt), the central Fire Station site which could be enlarged by also folding in the adjacent BT telephone exchange; the increasing number of vacant industrial buildings at the end of the Victoria Road; the coalyard site at the rail station (see the discussion of proposal 23 below), the scrapyards off Stubbing Holme Road; and, just as an example, let's add in the now green Bridge Lanes site cleared in the 1960s.

In parallel to this would be a review of potential 'major uses' seeking sites: housing is the largest, there has been some support for new retail provision, and so on. The aim would be to understand what is the extent of the opportunities, options and constraints might be between 'sites' and 'uses'; and also to diagramme the 'vectors of opportunity' to guide development patterns into the future.

(ii) The AP would therefore also benefit from an understanding of both its North-South axis - how to overcome the separation created by the A646, how to enhance the large area given over to the Calder Holmes park to its south, what is the number of traffic routes needed by the town in that direction (which relates to proposals 2-3, 5 and 24) - and its East-West axis, where the primary road corridor may face congestion pressures and where both gateway sites at either end are afflicted by uncertainty.

Q2: 'What is the relationship between the built town centre and its green surrounds and river corridor?' - which is in fact another spatial analysis. What the 2012 flooding ought to prompt is a reconsideration of this relationship, previously assumed to be benign or to be taken for granted. But an alternative analysis might suggest that management practices in some parts of the green uplands, which are also the headwaters of the River Calder and its tributaries, might be contributing to a transfer of flooding risk onto the town itself. This is consistent with what the AP says on page 20 about the management of the grouse moors.

Another consequence of the town's green surrounds is that in addition to being a visitor destination it is also (or rather was up until 2008) a housing market 'honeypot', which attracted development proposals of a quite inappropriate scale. Both the proposed Crows Nest and Browns Site apartment developments were the most obvious examples, but they were matched by the proposed Garden Street development in the town centre itself, and the proposed comprehensive Mayroyd development in the 1990s.

What this suggests is the need for the AP to strike a very careful focused balance between town centre and hinterland, accompanied by an equally clear view about the scale and type of acceptable/appropriate development - particularly given the previous theme about 'large sites'

Q3: Access to/from the town?: Section 4 talks about ensuring that 'there is an efficient and green/carbon neutral transport system linking Hebden Bridge with surrounding areas', and there are lots of individual related proposals. However there is no discussion about future projections for the majority mode (road transport - see map 15.3 in the recent Calderdale Preferred Options document for these), whilst another section considers for the promotion of a visitor market. The big questions remain: how will all these visitors access the town; how will residents access employment outside the town (so this is another version of the need for a stronger alignment between residential/employment location); and how will users be able to continue to rely upon the single main road route along the valley if this were to become congested (in situation where the Calder planners do not regard cumulative development impact as an issue for them to consider)?

Since parked cars also have to access the town via its roads this theme would also incorporate the developed understanding about parking provision; see proposal 30 for my discussion of this. We should not forget that the origins of the Garden Street development lay in a mistaken analysis of car parking need and what constitutes an appropriate response. Finally there remains uncertainty about the issue of the air quality 'canyon' in Market Street and its

ineffective AQ management area.

Now there is no need to jump to any particular or exaggerated conclusions about the town's transport future, and the AP also needs to refer to the positive proposals for the electrification of the Calder Valley line being consistently developed by Calderdale Council. But this is yet another spatial issue which requires both integration and very careful balancing.

Q4: Shared Space?: I find the Poynton 'shared space' case study wholly convincing (as seen in the video, although I would need to visit the place itself to see that it worked in practice) and I only wish its analysis had been available to the Traffic Review around 10 years ago because in fact it provides the missing key which we needed then to tackle the issues of the A646 (smoother flows and reduced speeds), reduce spatial separation, take out the traffic lights etc; as well as setting a wider context of urban regeneration for what otherwise might be perceived as just a traffic scheme. Essentially 'shared space' as an integrating theme could provide an opportunity to overcome the spatial separation imposed on the town by the presence of the main road leaving the canal basin *proposal 10* and Calder Holmes Park *proposal 31* as well as Fairfield *proposal 37* isolated from the town centre proper. The question then as now is: how to overcome that separation? So in fact the shared space theme is another subset of an overall spatial analysis.

What all the above demonstrates is that what the draft action plan is missing at the moment is this critical overlaying and integrating spatial analysis – so maybe '**Spatial Objectives and Options**' could be the theme. Whilst it probably won't be possible to undertake the sort of detailed analysis, let alone masterplanning, that would really do the issue justice - and let's also not forget that was the hijacking of the UCVR masterplan that resulted in the Garden Street near disaster - it would equally not be at all wise to proceed further without pausing to from these spatial issues at an appropriate level.

Q5. I suspect that another strategic theme would be '**Towards low carbon**' because this is a common factor across much of the spatial analysis, and also integrates economic & social with environmental proposals. See also the discussion of Section 6 and climate change below.

Finally there are two other more operational themes that could help set and balance the tone of the entire AP. The first is the need for it to include a realistic **project and financial prioritisation (Q6)** - with an incremental sequence of possible implementations, with high and low cost options - recognising that the next decade is likely to be substantially different in terms of the available funding opportunities and revenue finance from the last one. If you were to cost particularly its capital proposals - which I think you should as an instructive exercise - they would add up to several £10s of millions. In my judgment the draft AP appears to be looking backwards to that former rosy time rather than forwards into increased uncertainty and austerity. This is related to, if I can put it this way, a need to '**embrace the negative as well as the positive**' (**Q7**) on the grounds that it would be better to plan for more even balance between these two than for the former to rise up and bite the town unexpectedly. Amongst the negative 'threats' of this SWOT I would include: lack of capital and revenue funding for the proposals, which are substantial in number; increased flooding and climate change risk, with its economic sting; the potential erosion of town centre retailing (I enclose a copy of the new Centre for Retail Research report on this subject), or a change in its character as more multiples move in; and so on. This does not mean that the tone of the plan has to be pessimistic, simply that it would be a better plan if, having assessed future prospects with a realistic eye, it was consequently forewarned of difficulties to come.

C) Detailed comments on individual proposals

Proposals not given a number but included in the text are identified ***thus**

Proposal 1. We recommend research into the use of shared space As per the comments above the AP should see this as a broader concept, so including Proposals 5 and 7 as well, and as a means of reducing the spatial separation to the South created by the A646 (Proposals 9, 31 and 37)

Proposal 2. We recommend that Albert Street becomes one way (north>south). In fact this is not technically possible. The Hebden Bridge Traffic Review examined all the various North-South streets in the town as part of its proposal to close one of them: Bridgegate. Albert Street became the principal route in both directions, being the widest of them, and cannot be closed north>south for at least two reasons: 'redundancy' - in case Hope street has to be closed for any reason e.g repair; and so that large vehicles can make the left-hand turn northwards using its extended radius (not possible for either Hope Street or Commercial Street)

Proposal 3. We recommend that on-street parking in permitted on both sides of Albert Street Also not possible; see the previous comment

Proposal 4. We recommend that arrangements be made to ensure that the removable bollards in Bridge Gate are normally raised. Supported. (Just as a comment: it may be that certain vehicles continue to drive down Bridgegate because their satnavs are telling them it is still open).

Proposal 5. We recommend that the proposal to pedestrianise parts of Crown Street be subject to full public consultation and if accepted progressed as soon as possible. In the original Friends of the Earth pedestrianisation proposal in the 1990s which I wrote it was also suggested that Crown Street could be considered for closure, because it represented the next logical extension (eastwards) of a pedestrianised area covering Bridge gate and St George's Square. As I recall this option wasn't given much consideration in the Traffic Review. The technical difficulty consists of how to allow the top two thirds of Crown Street to continue to be accessible to vehicles with not just loops to hope Street/Albert Street via Carlton St and Cheetham St) but also a potential exit onto the A646 so as not to inconvenience motorists. Maintaining that exit at the moment is allowing Crown Street to be used as a short cut bypassing Albert Street. There are two technical and relatively inexpensive ways to do this: make Crown Street left turn only at the A646, and convert the bottom one third into some kind of shared space with continued parking availability.

Proposal 6. We recommend that work is undertaken to allow pedestrians to cross on the west side of the main traffic lights, and have the facility to be able to cross diagonally The overall objective of the Traffic Review for the A646 was to combine a slower speed limit (20mph) with a maintained and smoother flow which would consequently reduce air pollution. FOE is now promoting a **'blanket 20mph urban area speed limit'** across Calderdale so the AP should certainly include **a proposal to extend it here in Hebden**; the police were only prepared to support partial coverage in the traffic review. I raised the possibility of removing the traffic lights at the Bridgegate junction which would be consistent with this objective and technically possible because of the reduced traffic loading on Bridgegate. This wasn't taken up although I don't think because it was thought not possible. Therefore now is the time to reconsider this possibility but within the right context of maintaining/increasing the safety of pedestrians and trying to reduce the spatial separation caused by the A646 flows. These proposals - part of the 'shared space' theme - will need to give particular attention to the safety of children etc crossing to/from Riverside school.

Proposal 7. We recommend researching the possibility of hangings to be sited above Market Street This should be part of a shared space scheme - as per Proposal 8 - for Market Street that integrates improving the look of the streetscape with control of vehicle speed, which at the moment isn't effective.

Proposal 8. We recommend retaining the off-peak parking in Market Street. We recommend researching other traffic calming measures including wider pavements in places and tree planting. See the comment on Proposal 7

Proposal 9. We recommend further discussion about how the canal basin can be better used This and Proposals 10, 31, 35 and 37 need to be integrated as part of a wider consideration of 'spatial strategy' - specifically the need to overcome North-South separation caused by the A646 - and 'shared space'.

Proposal 10. We recommend research into a canal bridge from the canal basin to the park. See the comment on Proposal 9. I have my doubts as to whether a third bridge across the canal can

be justified, in view of the absence (I would think) of a desire line that extends from the Basin into the town centre, and therefore also across the canal. So instead of looking at the north-south axis I would suggest focusing upon the east-west one via Proposal 35.

Proposal 11. We recommend that a task force be set up to maximize efforts in making premises accessible to all. This is a companion action to those advancing 'shared space' so should be located alongside them.

*** Section 2: Local Economy:** This section concentrates on the visitor, and retail, economy but I would suggest that it should take a wider perspective and be based on a more mainstream analysis in which the manufacturing, service and creative sectors are to the fore. Doing this will also help reposition the town's image away from too strong a dependence on the visitor market, which is over-dominant. So this would involve moving the paragraphs on page 10 presently entitled 'The broader local economy' up to the front, with the objective of promoting and supporting instead 'a balanced economy'. Seeing the manufacturing and service businesses here alongside those located in Mythomroyd would also help.

Proposal 12. We recommend joint marketing initiatives for the town's businesses, focused on the localism and individuality of our shops.

Proposal 13. We recommend that successful relocation of the market should be one of the first priorities for the town.

Proposal 14. We recommend the establishment of a market development task group, and researching the idea of specialist markets

Proposal 15. We recommend that we aim for accreditation by FARMA for a genuine Farmers' Market

These four proposals place too strong an emphasis on retailing and specifically the market. Although I sat on the subgroup of the Traffic Review that developed the Lees Yard market relocation proposal I don't think that it warrants this attention, because the use of Bridgeway for market stalls in the recent Food Festival event demonstrates the flexible multi-functionality of shared space, especially if we develop more (e.g Crown Street). There is a real issue about where the market should be located but this would be better resolved within the wider discussions about 'parking provision' (because the choice between the Market Place and Lees Yard sites devolves into a question of 'which car park should you sterilise for how many days a week?'), 'Large Sites' (see above), and 'spatial separation' (the canal basin potential location).

Proposal 16. We recommend the establishment of a visitor economy and strategy group, the updating of the 2005 Tourism Action Plan, and associated research into visitor profiles and tourism assets. I haven't revisited the 2005 TA Plan for this response but - as a former head of tourism for a local authority - I would suggest a slightly more constrained approach that concentrates on 'potential products', whether those be the cycling potential of the area (which links to proposals 27 and 26) or various aspects of heritage including Alice Longstaff. Individually these will require particular funding bids to be prepared but the recent success of the Birchcliffe Centre demonstrates what can be achieved.

Proposal 17. We recommend funding be sought for a 'Town promotional Manager'. (And I've been a city centre promotional manager as well!) Well that depends on what products you've got to promote. It's an interesting discussion: on the one hand the existing number of products/events might achieve greater value-added/economies of scale from a more coordinated approach (and equally might not); on the other end it might be better to focus on products rather than promotion. I would suggest having a wider discussion before proceeding with this specific proposal.

*** Browns Site, Mytholm:** This issue is in the wrong place, and would be better considered in a wider discussion about 'Large Sites' (see above). What the plan says so far is sound - '... gateway site ... empty for more than twenty years ... proposals which are proving controversial ... unrealistic to expect that this land will remain undeveloped ... if community options were considered unviable ...' ... and then it expresses a preference in favour of 'light industrial use (and in particular start-up design and manufacture units)' over retail development. The suitability of the site for the latter will now be tested by the retail impact study required from the applicants by the Council, and despite the work that I did on traffic impact of a high trip

generation use such as a supermarket I remain concerned about that aspect. So whilst it's now a received opinion that housing development on the site is unacceptable because of flood risk, with the apparent major pressure on other greenfield/green belt sites in the area for housing maybe this prohibition ought to be re-examined. This is just a particular example of why a 'Large Sites' spatial analysis is so important for the AP.

Proposal 18. We recommend exploring the potential with both Calderdale Council and the existing owners of the former Fire Station site. See the earlier comments about 'large sites', rather than proceeding in isolation.

*** Section 3 Housing:** This is a good example of why the AP needs to be more strongly integrated with Calderdale's developing Local Plan which at present is proposing that a 100% of the 252 new homes referred to on page 13 be located on greenfield/greenbelt sites, but which doesn't contain a sufficiently strong preference in favour of previously developed land and high densities. The thinking of the AP needs to start with an engagement with this threatening prospect leading on to a determined response, including via the Calderdale Local Plan to secure 'brownfield before greenfield' and 're-densification' objectives. So the sentence to the effect that 'We would support creative new infill in areas ... including Heptonstall Rd, Bridge Lanes and Commercial St, which previously had housing which was demolished during the 1960s-1970s.' needs to be read in this context and moved centre stage. **There needs to be a proposal recommending that the Partnership, Town Council and Calderdale Council undertake a review of all possible sites to secure the above two objectives, as a contribution to the housing site allocation exercise which will be commencing towards the end of 2013.**

Proposal 19. We recommend that, for new housing, focus is particularly on land which formerly had housing; and that a significant proportion of the projected increase in homes be provided by housing associations and selfbuild co-operatives. I think this needs to be strengthened because, certainly even in the favourable market conditions before the housing boom collapsed, there was little prospect of market solutions achieving the necessary amounts of affordable housing; developers now will be even more determined to refuse to meet these responsibilities within a now weakened planning framework. This is another good reason for the AP to be informed by an understanding of housing market potentials.

Proposal 20. We recommend the exploration of greater use of spaces above shops and offices for conversion into rented accommodation. It might be helpful if some indication could be given of the potential scope of this exercise; so it should be combined with the above review.

Proposal 21. We recommend that the possibility of rebuilding Buttress Brink be explored further. I would suggest that this is a subset, and just another particular example, of the necessary wider approach discussed above.

Proposal 22. We support the campaign being led by the Friends of Hebden Bridge Station to install lifts at the station. Could a less expensive solution involving surface level ramps to Palace House Road at least be investigated? This alternative still has lots of difficulties with it, but it's the method by which disabled access has been provided at Littleborough Station.

Proposal 23. We recommend that Calderdale Council be asked to progress the extension of the railway car park urgently with Network Rail. As part of the Traffic Review I led the work with Calderdale Council and Metro to prepare a detailed scheme for the extension of the car park into the coal yard area, as the infrastructure for a transport hub at the station location. Plans were drawn up and two meetings held with Metro and Northern Rail; but despite repeated progress chasing by me Metro then gave up, ostensibly on the grounds that the scheme required revenue support as well as the capital budget, and that the then PTA had not yet approved the principle of charging for the use of station car parks (except in particular cases e.g Huddersfield). So a scheme is ready and waiting - and also included provision for coach parking; see proposal 25 - but requires Metro to actually do something; in the meantime car park extensions have been implemented elsewhere on the Calder Valley line including Mytholmroyd and Sowerby Bridge.

The failure of Metro to act then caused other distortions within the town's car parking stock because the Town Council's new car park on Station Road was intended to be used as a longstay

car park for the town centre and not as a station car park overflow.

The idea that 'there is also scope for a multi-storey car park at the station (whilst protecting the heritage aspects of the station)' is a singularly bad one for at least three reasons: it's not necessary, because the surface scheme I mentioned more than doubled the number of spaces available; whilst MSCPs are not financially viable (so it couldn't be paid for); but are extremely ugly, so such a development would not be consistent with Conservation Area status

Proposal 24. We recommend that active steps be taken to improve the walking route from the town to Hardcastle Crags. See the discussion above about the north-south axis.

Proposal 25. We recommend that long-stay parking for coaches be identified. This proposal should be amalgamated with Proposal 23

Proposal 26. We recommend immediate action to create better cycle facilities. Better parking for motorbikes and scooters is also needed. Support - and in the latter case so that motorbikes stop turning St George's Square into their personal car park.

Proposal 27. We recommend that action is taken immediately to engage in Tour de France 2014-focussed activities which can provide a local legacy for the area. See the discussion under proposal 16.

Proposal 28. We recommend the creation of a campaigning and community-led bus users' group, to liaise with Metro over potential improvements to the Hebden Bridge local services. I support all these proposed measures (and the local network first emerged from a bid prepared by Mary Farrah and the Local Agenda 21 Transport Group when I chaired it) but there must be a real fear about its ability to survive in the long-term. So the focus on integration around a transport hub at the station has to be the right strategic option.

Proposal 29. We recommend that a telecommunications task group be created to ensure high-speed connectivity for Hebden Bridge and the rural parishes. Supported.

Proposal 30. We recommend discussions as to whether the concept of a park and ride visitor car park on land at the rear of Walkey Canalside Mill is feasible and desirable. Proposals for 'park-and-ride' in Hebden Bridge continue to be made on the basis of a superficial analysis of parking in the town that contends that 'Hebden needs more parking provision', that this must be achieved by more physical spaces, and (in this case) these should be provided at some distance from the town because a large site is not available within it. As my parking report prepared in 2008 in connection with the Garden Street scheme demonstrated (also enclosed), the town needs a more sophisticated and active approach to parking provision. Whilst I have not revisited the issue since then I remain of the view that the town's requirements can be met within the existing number of spaces; which is just as well because any attempt to expand parking provision (either with/without additional spaces) creates a further difficulty of increasing pressure on access to the town along the A646. Finally 'park-and-ride' only works in particular circumstances, where the destination (e.g York, Cambridge) is of sufficient size as to make the service financially viable. This would not be the case for Hebden Bridge whilst a service from that location would not be used because motorists would not incur a 'waiting' or 'uncertainty' premium by using it but instead would prefer to take their chance of finding a town centre spot.

Proposal 31. We recommend that a strategic plan for the long-term sustainable development of the park be developed. See the discussion under the general spatial analysis and Proposal 9.

Proposal 32. We recommend reinstating the mini-golf putting green in the enclosed lawn near the pavilion as soon as possible. The tennis courts urgently need attention.

Proposal 33. We recommend that a bandstand/performance area be created, perhaps in the area of the former bowling green. Proposals 32 & 33 should be combined and reprioritised. As a first priority the changes to the tennis courts would first add to the range of provision; however I'm unclear as to why the former bowling green isn't being reinstated (I've not been able to establish what is happening to the relative popularity of this sport). Instead it's being sacrificed

to an outdoor 'bandstand/performance area' which is quite inappropriate given the way in which external noise rackets around the valley; also that particular site is too constrained to contain an audience of any size. Once provided at very considerable expense the pressure will be on to increase its use; let's stop noise pollution at source, please. I'm also unclear why the mini-golf putting green needs to be reinstated 'as soon as possible'; instead this might provide a nice picnic area, maybe linked to the cafe?

Proposal 34. We recommend that further discussions are held on the possibility of new leisure facilities. This is one area where 'prioritisation' might help keep the AP within manageable bounds. I've never been clear why Hebden Bridge has to have a swimming pool when there are new ones available in Todmorden and Sowerby Bridge; so we should encourage nearby Mytholmroyd to go after this type of facility and the good people of Hebden Bridge can get a little fitter by walking or cycling there.

Proposal 35. We recommend the work to open up the rear of Memorial Gardens to the canal be undertaken. See the discussion under proposal 9

Proposal 36. We recommend that the town council consider the development of a long-term business plan for the development of the Picture House. No comment

Proposal 37. Although there is at present no obvious funding source, we recommend that the concept of a new pedestrian footbridge to Fairfield be researched further. Not having the 2005 AP I can't understand the argument as to why the existing path up the stairs next to the canal lock is being judged insufficient. A footbridge here would be architecturally intrusive and surely not a funding priority.

* **Section 6 Greening our valley:** At the moment the statement that the 'expert advice is that, as climate change continues and global temperatures increase, we can expect more volatile and extreme weather conditions' - which is correct - doesn't have a policy conclusion, so it needs to be followed by something like: 'Therefore we support Calderdale Council's climate change strategy *Calderdale's Energy Future* with its adopted target to achieve a 40% reduction in carbon emissions by 2020 from a 2005 baseline, and all the proposals of this plan need to be consistent with Hebden Bridge making its proper contribution to achieving that target'. Can I suggest that you consider retitling this section: 'Low Carbon Hebden Bridge'?

* **Water and flooding:** I think this paragraph needs some wider reference about the potential economic threat to the town created by increased flooding risk, and the need therefore to respond to this in some broad way. This would involve taking forward the proposals of the Council and Environment Agency flood analysis when it's available and participating within the DEFRA flooding resilience project; together these ought to represent quite a package of both hard and soft measures. The plan needs to show a commitment to these.

Proposal 38. We welcome community-led moves to erect wind turbines on appropriate upland sites which are not sensitive in landscape or habitat terms; community-led moves to install micro hydro turbines; and encourage more development of community share issues as a way of capitalising such schemes. In addition to the statements about renewable energy generation **this proposal should support with a higher priority a comprehensive and long-term programme for improving the energy efficiency of all the buildings in Hebden Bridge** (consistent with the 2nd paragraph), which will have positive economic and employment benefits as well. Just on the hydro topic my personal view is that you should not over-emphasise the significance of this generation method, which is expensive, regulatory intensive, and with negligible energy generation outputs.

Proposal 39. We recommend that more work is undertaken to make use of unused local green spaces, particularly land owned by Calderdale Council. I think you should transfer or link this topic to a new section focusing upon spatial review and opportunities.

Anthony Rae
10th June 2013